

Response to the Fundamental Review of Social Housing Allocations Policy

March 2014

1. Introduction

Housing Rights Service (HRS) was established fifty years ago and is the leading provider of independent specialist housing advice services in Northern Ireland (NI). We work to achieve positive change by protecting and promoting the rights of people who are in housing need and our policy work is based on the experience of our clients. Our services are delivered throughout NI and focus on the key areas of preventing homelessness; accessing accommodation; tackling affordability and poor housing conditions.

2. Summary

HRS welcomes this opportunity to respond to the recommendations arising from this fundamental review. We believe social housing and the support it offers is vitally important to many households in NI; including many of our clients who are vulnerable or have been homeless.

However, Northern Ireland is in the midst of a severe social housing shortage with supply far outstripping demand. We now face the challenge not only of deciding how to increase this supply, but also how to allocate scarce accommodation to the ever increasing number of applicants on the waiting list (currently 41,871 with over 22,000 in housing stress and approximately 10,000 statutorily homeless).¹ We are therefore supportive of the need to significantly increase the social housing new build programme, along with increased resources to sustain tenancies and prevent homelessness.

HRS believes critical to this review is the need for a wider policy debate on the purpose and functions of social housing. It needs to be decided whether social housing is fundamentally about addressing acute housing need and providing a safety net or whether it is also about meeting wider Government objectives, such as promoting economic regeneration.

There is also a need to promote a greater public appreciation of the benefits of social housing and to counter the inaccurate perceptions of social tenants held by some members of the community. With over 40,000 people on the waiting list evidence shows that social housing is clearly the tenure of choice for many people in Northern Ireland.

HRS strongly believes in prioritising those with the greatest need in the future allocation of social housing. Having considered the research recommendations in some detail our views can be summarised as follows:

- We support the introduction of a Housing Options Service.
- We support retention of the principle of universal access to social housing.
- We support the retention of a needs based approach to prioritising applications for social housing.

¹ Source NIHE http://www.nihe.gov.uk/housing_market_review_2013-2016.pdf

- We believe further research on the benefits and disadvantages of points versus banding approaches to prioritising applicants is needed and, for example, whether a hybrid scheme is preferable.
- The use of date order and priority dates schemes should be further investigated.
- We disagree with transfer led allocations for new build properties.
- We have no objection to transfer applicants being opted in to the mutual exchange register (unless they do not wish to be) however we have serious concerns about including Private Rented Sector (PRS) properties within this scheme.
- A Choice Based Letting (CBL) system is worth exploring further as it could be beneficial to some of our clients, but adequate support systems for vulnerable applicants would need to be guaranteed and along with detailed monitoring requirements.
- We understand the rationale for placing specialist social housing outside mainstream allocations.
- We have serious concerns about the use of local lettings policies and would recommend caution in pursuing this practice.
- The recommendations relating to suspensions for Anti-Social Behaviour (ASB) and reasonable offers should be suspended until the outcome of the DSD's (Department's) consultation on draft ASB legislation.
- We are not convinced of the need for a Strategic Independent Allocations Scrutiny Panel (SIASP) but would welcome being involved in any further discussion regarding this recommendation.
- In the longer term, the introduction of a Quotas System would require careful consideration.

Moving forward HRS suggests the following:

- A stakeholder group representative of the main interests involved in this discussion should be convened by the Department to help inform the formal consultation process and emerging policy proposals.
- Further consultation should take place particularly with current applicants on the waiting list and agencies with significant experience of advising applicants on social housing allocations.

3. General Comments

3.1 HRS experience

This response is based on our experience of providing advice on a daily basis to clients who are homeless or in housing need. During 2012-13, we dealt with 40,000 enquiries of which 12,500 were about accessing housing. Within this figure almost 10,000 enquiries related to various aspects of the Housing Selection Scheme. The main areas of advice were: temporary

accommodation issues; points assessment reviews; reasonable offers; transfers and exchanges. Overall, we secured positive outcomes for 96% of those who used our advice service during this period.

Our experience of the current Housing Selection Scheme is that it has worked quite well and that it generally has fulfilled its purpose of prioritising allocation on the basis of need. There have however been some negative issues experienced by some of our clients. For example, we would welcome a more equitable approach to the award of Interim Accommodation points given the prevalent use of PRS single lets. Also we are concerned that those who are sleeping rough or sleeping in cars are not entitled to an equivalent award of points.

Overall, the current points allocations scheme is relatively easy to explain to applicants. This appears to be in contrast to researchers' views that it is a complicated system. We believe it could be possible to retain the best elements of the current points scheme and introduce amendments to improve the scheme such as the abolition of intimidation points, the broadening of the functionality matrix and better use of management transfers.

3.2 Consultation process

The review was carried out by a team of researchers from the Universities of Ulster and Cambridge who conducted discussions with a number of stakeholders and reviewed best practice in the allocation of social housing in the UK and Republic of Ireland.² It is disappointing that the researchers were unable to consult with applicants on the waiting list and it would appear many advice agencies with substantial experience of the Selection Scheme were also not involved in this process.

HRS was pleased to be invited to meet with the local research team at an early stage in the process. We also welcomed being part of a subsequent wider stakeholder meeting at the University of Ulster. However, we understand that an advisory group was set up to consider initial findings. Given our specialism and interest in this area, we would have welcomed more extensive engagement with this review process, particularly focused on the experience of our clients and advisers with the current scheme. We believe the Department should in the next phase of this consultation process engage directly with applicants on the waiting list to elicit their experience of using the current allocations system.

The final research report (Conclusions and Recommendations) contained the following recommendations. In this response we comment on each of these recommendations as follows.

²This evidence is examined in Report 1 (Current approaches to accessing and allocating social housing in Northern Ireland) and Report 2 (Best practice approaches to accessing and allocating social housing in Britain and the Republic of Ireland).

4. Recommendations

4.1 A Housing Options Service should be introduced in Northern Ireland

HRS welcomes the proposal to establish a Housing Options service to provide advice on housing and housing-related issues. In essence, HRS already uses this approach. As well as examining a person's legal rights and assisting to prevent homelessness, our advice service also considers other housing options e.g. private renting.

Quite often renting privately is the most realistic option for certain HRS clients. Whilst we believe the private rented sector (PRS) can provide suitable housing for some people in housing need when the right support and safeguards are in place; the long term stability and below market rents that a social home can offer will often remain the most appropriate and realistic option for vulnerable people such as homeless households. We would have concerns generally about encouraging all social housing applicants to take up tenancies in the PRS given the lack of security of tenure and rent control together with poor property conditions and management standards often encountered in this largely unregulated sector. In our experience, people in receipt of benefits or on low incomes are generally renting at the bottom end of the private rented market where tenancy and property conditions are poorer. The proposed review of the PRS in the Department's Housing Strategy Action Plan could usefully consider how the sector can be improved to best meet the needs of such vulnerable applicants.

The researchers believe that the aim of a Housing Options advice service is to allow housing providers to meet a range of housing needs without sole reliance on the social housing sector. It is argued that such a service will help manage expectations and encourage applicants to explore 'more realistic' solutions to their housing needs. However the biggest challenge remains to create meaningful choices for applicants.

We would contend that one of the most important choices valued by our clients is the chance of a decent affordable home in their local community. This is often takes priority over the option of moving away from local support, family and work in order to secure a place to live. We fully support the need for the proposed service to provide alternative housing options and also other services e.g. money advice, referral to mental health services and drug dependency support services. However, we also believe for such services to be effective it is vital that people are given clear, impartial advice and are supported to make the housing choice that is right for them.

4.2 Universal access to social housing should be retained

It is recommended in the research study that this fundamental principle of the current social housing scheme should be retained so that everyone can apply for social housing. We fully agree with this viewpoint.

4.3 A needs-based approach should be used to prioritise applicants for social housing

We fully support this fundamental principle as we believe the central role of social housing should be to house those in the most severe need. However the researchers qualify this core principle by saying that, although any new selection scheme for social housing should be primarily based on meeting individual need, other factors could also be taken into account in order to encourage social mixing and economic regeneration. These factors could include, for example, giving a preference for social housing allocation to employed people; those who make an important contribution to the community; 'good' tenants with no rent arrears or a record of anti-social behaviour; and those committed to a 'Shared Future'. Looking at a range of factors not just need, it is argued, could allow for greater flexibility and the setting of local priorities for how we allocate social housing.

HRS is concerned that any diversion from an exclusively needs based approach could result in a less transparent and more complicated system which could introduce more subjectivity and potentially interference in the allocation process.

4.4 A banded approach should be adopted for prioritising applicants

A. Bands should be ranked to prioritise applicants

B. A date-order system should be used to prioritise applicants within bands

C. A Priority Dates Scheme should be used for changing circumstances

It is proposed that a 'simple' banded system should replace the current more complex points system to prioritise applicants, using time on the list within each band to determine priority. It is argued that bands make it easier for people to understand their chance of being housed because they rank applicants by priority, whereas points only tell them their chance if they know how many points everyone else on the register has. The researchers believe applicants may find a banding scheme easier to understand as it makes their chances of getting a home clearer and can reduce fabrication, 'points chasing' and fraud.

HRS regularly receives enquiries about points from people who want to know what their score means or how many more points they need to get a home. However, in our experience, the current points scheme is relatively easy to explain to applicants. Our advisers believe that points are tangible, easily understood by applicants and not given to misinterpretation or accusations of unfairness. It is noteworthy in this respect that there has never been a legal case upheld against the Housing Executive on the grounds of religious discrimination using the current scheme for the allocation of social housing. In fact there appears to be a lot of community support for the current system. In our view, the current points system could be modified to make it more effective. We would suggest further consideration of this approach before developing a totally new system (with all the turbulence and expense that this would involve).

HRS believes it could be possible to retain the best elements of the current points scheme and improve it by introducing amendments such as: the abolition of intimidation points; the broadening of the functionality matrix; and better use of management transfers.

As a banding system was previously used in NI and discarded in 1995 in favour of the current point scheme, we would welcome consideration of why it was abandoned. The publication of further evidence from Britain on the use of banding schemes to support the proposed need for change locally would also be welcome.

The researchers believe that there should be priority awarded for the length of time applicants have been waiting for social housing. We would be concerned that this should not be a predominant factor that could prevent applicants with the most acute housing need from being allocated a social home. HRS would be interested in receiving further detail on this recommendation, however we accept that a priority dates' scheme could particularly assist applicants when their circumstances change.

4.5 A separate Transfer List should be established

A. The proportion of lets to transfers should be set by a Strategic Independent Allocations Scrutiny Panel (SIASP)

B. There should be transfer-led allocations for new build properties

C. Management Transfers should continue

HRS is supportive of measures using the transfer system to encourage greater mobility in the social housing sector. Currently the Housing Executive makes allocations to transfer applicants on a ratio of one transfer allocation for every two waiting list allocations. At the moment tenants must normally wait two years before becoming eligible for transfer and should not be in rent arrears however there have been concerns expressed in the past that this is too restrictive. Difficulties have also been encountered with tenants unable to transfer because they live in difficult to let districts.

It is suggested by the researchers that there could be merit in prioritising transfer applicants for a greater proportion of new build social homes in order to build more sustainable communities. However we have strong objections to the idea of exclusively allocating new social homes to existing tenants rather than waiting list applicants already in acute housing need. Also there is a fear that transfers could be awarded on the basis of landlord 'value judgements' rather than need i.e. rewarding 'good' tenants with new build accommodation.

The Housing Executive is considering introducing a 'management transfer' category for tenants who wish to 'downsize' in order to retain Housing Benefit payments under the Welfare Reform 'bedroom tax' proposal. Social landlords already use management transfers to flexibly manage their schemes/estates and to meet changing tenant needs. We believe it may be possible to broaden this facility if the current points scheme is to be retained.

Our views on the proposed establishment of the Strategic Independent Allocations Panel (SIASP) and its role in setting the proportion of transfers, particularly for new lets, are considered later in this response.

4.6 Mutual exchanges should be promoted as a mechanism to meet housing need

A. Transfer applicants should be opted-in to the mutual exchange register

B. The inclusion of registered private rented sector properties within the mutual exchange scheme should be explored

HRS supports moves to make it easier for people to transfer between social rented properties either in their area or in different parts of the UK and Ireland. This should allow tenants to move to a house more suitable for their household size if they so wish, which will make better use of limited stock. It could also enable people to move to areas with more job opportunities. The Housing Executive and most Housing Associations already operate a mutual exchange register at www.homeswapper.co.uk. Transfer applicants have to register for this tenant-led home swapping service and it is proposed in the review that they should be automatically enrolled in this particular register. According to the Housing Executive there are approximately 200 homes currently available for exchange through Homeswapper however it is expected that this modest number will greatly increase. At the moment the consent of landlords is required for these exchanges and they will not carry out any change of tenancy repairs except for those that are required to comply with health and safety legislation. Tenants may also need to check their 'Right to Buy' entitlement for these new homes.

Social landlords typically refuse permission for these exchanges on a number of grounds such as: if there are rent arrears; the new property is regarded as too small or too large for the household; if the tenant's current property has been adapted or is part of a sheltered scheme and the new tenant has no need for this type of accommodation; and if improvements/alterations have been carried out without consent. Some revision of these exclusion criteria may be required as part of any new allocations scheme.

The researchers are proposing that, like in Britain, private rented properties are also included in these exchange schemes. HRS is not convinced about the value of simply replicating this in NI. We would have concerns that in this situation social tenants could unknowingly sacrifice key protections such security of tenure, repair assistance, right to buy and a degree of rent control by giving up a social tenancy and moving into the largely unregulated NI private rented sector. There are also practical difficulties for such tenants moving into the PRS and finding the upfront costs for deposit, rent in advance and letting fees to secure a tenancy. Other concerns exist in regard to allegations of 'queue jumping' and allowing exchange tenants in social housing the 'right to buy' their new homes.

However, HRS believes mutual exchange within social housing sector could be particularly useful for a small number of tenants who require a smaller or larger home; or are interested in moving to a new area and who want to avoid a lengthy wait for a transfer.

4.7 A Choice Based Letting (CBL) system should be introduced for the allocation of social housing properties in Northern Ireland

A. To widen access, there should be support for those who may be disadvantaged in the CBL system

B. There should be use of an ‘Assisted List’ approach as a mechanism to support vulnerable and excluded groups

C. CBL bids should be monitored

This is a key proposal to move away from the traditional direct letting approach to a CBL system. Direct letting is generally seen as a ‘top down’ system where applicants state their housing preferences in regard to the areas where they would like to live and housing officials match this by making an offer of an available property to the applicant with the highest number of points on the waiting list. However in recent years direct letting has been abandoned by many local authorities in Britain in favour of CBL schemes which are ‘bottom up’ in nature with applicants taking responsibility for matching themselves to advertised properties and making bids. It is argued by the researchers that this system empowers applicants by allowing them to exercise their right to choose and take control of the allocations process.

The researchers believe that the adoption of a CBL scheme in NI will lead to applicants having a more realistic expectation of being housed with many extending their areas of choice and refusing fewer reasonable offers. The Housing Executive estimates that for every offer of housing that is accepted, more than three are not. (It should be noted that some CBL schemes use points as a way of indicating levels of need whilst others use banding as a way of delivering different policy objectives.)

Evidence from Britain suggests for CBL systems to work effectively there needs to a high level of support for vulnerable groups and good communication between landlords and applicants including usage of a wide range of advertising techniques not restricted to online platforms.³ These advertising platforms and techniques can include mail outs to all households, newsletters for those on the housing register, shop-fronts, information events in shopping and community centres and the provision of social media and interactive websites. All media used would need to be compliant with the requirements of the Disability Discrimination Act. A key question for the Department is the extent to which landlords can provide additional support to people from vulnerable groups without giving them an advantage.

³ NI has the lowest internet usage in the UK at 79%. Source ONS 2013

HRS believes the impacts of CBL on demand, active bidding (and non bidding); customers' understanding of the process, involvement of vulnerable groups, tenancy sustainment and housing management efficiency will require sensitive monitoring. We believe that CBL could work well for some clients but we foresee major issues with this system for our more vulnerable clients. We note there is evidence which suggests that two groups in particular may feel disadvantaged under CBL schemes because they are no longer benefitting from an assumption about their level of need based on their belonging to a particular group i.e. people in early old age and single homeless people who have no other presenting need.⁴

The establishment of an 'assisted list' for particularly vulnerable clients is recommended where for example nominated advice agencies and other advocates can make a bid on an applicant's behalf. Where necessary and with informed consent, assisted bidding could also be undertaken by an appropriate key worker, friend or relative on behalf of their client. Monitoring of any CBL system will be vital to check that such vulnerable groups are using the system effectively. Bidding patterns in particular need to be closely monitored to identify vulnerable clients who are not participating.

Moreover, the research literature suggests the most common barriers to participation are having no internet access, difficulty in reaching a landlord or council office, and having a disability. The particular difficulties faced in Northern Ireland, especially in rural locations with limited online connectivity need to be considered in this context.⁵ In addition, customer surveys from Britain suggest older people are having greater difficulties using CBL internet systems with greater dissatisfaction reported amongst older unsuccessful bidders.

Research has shown that a major advantage of CBL is that it can reinforce a vulnerable applicant's engagement with support services. Applicants can regularly interact with support providers to help make a bid and that gives them contact with support staff and in some cases support from peers. However, this requires constant improvements to be made to make information more accessible and usable by vulnerable groups. It also requires integration with social services and Supporting People and recognition of the key role played by families, friends and properly funded advice and other agencies in supporting applicants. This is likely to put further demand on such services.

Of course CBL does nothing to address housing shortage and while active bidding can be a very positive and empowering process for high priority applicants, it is likely to still be a dispiriting experience for those with low priority in Northern Ireland's reduced social housing sector.

⁴ The impact of Choice Based Lettings on the access of vulnerable adults to social housing. Housing LIN briefing (2009)

⁵ See for example JRF Programme Paper. Place. North Yorkshire Home Choice Evaluation. David Mullins, University of Birmingham, Pat Niner, University of Birmingham and Filip Sosenko, Heriot-Watt University (2014)

4.8 There should be a review of the classification of properties with specialist accommodation which will sit outside the principal scheme

If the principle scheme is developed we would support the need for this classification review in order to speed up allocations and reduce the administrative burden. In our view specialist housing, such as sheltered accommodation and 'housing with care', should be excluded from the principal allocations scheme.

4.9 Local Lettings Policies should be used to meet identified local circumstances

HRS is not convinced by this proposal as it could undermine needs based allocations and we would recommend caution in adopting such practices. It is proposed that local letting policies which take account of particular circumstances within defined areas should be used in making allocations. This would be applied particularly in areas of low demand or where there is a recognised need to create sustainable and mixed communities. It is argued that local lettings policies would allow for the particular needs of local communities or estates to be addressed and the specific example of tackling anti-social behaviour is cited in the reports. However in our view local letting policies, if deployed, need to be transparent, time limited and carefully scrutinised in association with stakeholders. We believe the greater use of management transfers by social landlords could address such local circumstances.

4.10 There should be a facility to make direct lettings in prescribed exceptional circumstances

Along with the above recommendations, it is proposed that some properties could also be allocated outside CBL through direct letting and would not be advertised on CBL. Such prescribed circumstances would include, for example, specially adapted properties or for hospital discharges. We would support this proposal, particularly for offenders leaving detention, as it will allow social landlords to adopt a flexible approach in dealing with exceptional circumstances.

4.11 Applicants that have committed Anti-Social Behaviour (ASB) should be suspended from the list for up to 2 years

In a departure from established practice in Britain, the researchers recommend that applicants should be suspended from making bids or receiving offers of accommodation for up to 2 years. This is meant to be determined according to the individual circumstances of applicants, but these are not detailed in the reports. Such applicants who have committed serious ASB or major breaches of their tenancy will be allowed to stay on the register to allow for the suspension to be quickly lifted if behaviour has improved following expiry of the restriction. In our opinion simply suspending applicants from the allocations list for a set period is not an effective housing solution as it will simply transfer the anti social behaviour to the PRS or to temporary accommodation providers.

We would question whether this proposed measure is required as we believe there is already sufficient legal redress and practical measures in place to tackle ASB in social housing. Given the current DSD consultation on a proposed Housing (Anti-Social Behaviour) Bill we recommend that any further suggestions to tackle ASB in social housing are deferred until the outcome of this work.

4.12 Applicants should receive a maximum of two reasonable offers

A. There should be suspension from the list for a period of one year for those who refuse two reasonable offers

The researchers point to a relatively high level of refusal of offers under the current direct letting system which they believe can create management difficulties and delays for landlords in processing repeat offers and re-letting properties with a consequent loss of rental income. It is argued that the reduction from the current arrangement of three offers to two is in line with normal practice in Britain and Ireland. However we would argue that such a diminution runs counter to the principles of increasing choices and options for applicants as advocated in the research reports.

HRS believes it would be useful to explore with applicants why they refuse 'reasonable offers' in order to better inform this particular discussion. It may be that the difficulties voiced by landlords in this regard could be tackled through an enhanced Housing Options Service and improved landlord administrative and communication systems.

The researchers also favour continuing the current sanction of suspension for one year for applicants who refuse reasonable offers however we note that most suspensions are for shorter periods in Britain. We would argue that if the previous recommendation is implemented then a shorter suspension period of six months should be considered.

4.13 A Strategic Independent Allocations Scrutiny Panel (SIASP) should be established

The establishment of this scrutiny and oversight body would be a significant change for the existing social housing system. It is envisaged that the panel would hold social landlords to account for the way they would set up and administer the new allocations system which seems to suggest that any new scheme may have difficulty in attracting public confidence. We believe more detail is needed on the legal status of this body and also how it would be recruited, regulated, and funded in this age of austerity. The researchers appear to be suggesting that the body would have wide reaching powers e.g. a decision-making role in identifying the proposed banding scheme (recommendation 4), setting the proportion of new lets on the transfer list (recommendation 5A) and framing local lettings policies (recommendation 9). The panel would also scrutinise and evaluate the performance of the allocations system, potentially involving applicants and tenants in this process. The composition of the panel is recommended to be no larger than 12 members with at least 2

being tenants. It is expected that the SIASP would be funded and serviced by the proposed Regional Housing Body.

We would welcome further discussion on why these oversight functions could not be delivered by the proposed Regional Housing successor body or an independent housing regulator and whether the Department would still have final authority on the panel's proposed decision making.

4.14 Allocations should be monitored using Housing Market Areas

We believe further detail is required on how SIASP could scrutinise the operation of the allocations scheme on an area basis based on the recent studies which have mapped 11 different Housing Markets Areas (HMAs) operating across Northern Ireland.⁶

4.15 There should be work towards developing Enhanced Housing Options Services

We support the recommendation, in the longer term, to develop an Enhanced Housing Options Service in order to establish more effective working relationships between landlords, councils and the health & social care sectors, for example. In Britain it has long been recognised that housing problems are often linked to poor health, education and employment opportunities and a number of successful partnerships have been developed for such advice services. A 'one-stop-shop' approach to dealing holistically with applicant's housing options and problems is recommended and we believe this recommendation is worthy of further exploration.

4.16 The introduction of a Quota System should be explored

A. There should be provision for quotas to be varied between HMAs

We are not convinced by the rationale to consider introducing a quota system in the longer term and how this could be varied between HMAs. HRS would appreciate further detail on the long term recommendation to use quotas between bands, specified by SIASP in consultation with stakeholders, and the proposal that the panel could also consider introducing quotas within bands in order to further assist the development of sustainable and mixed communities.

Although the researchers believe the panel could have an enhanced facility to vary quotas by Housing Market Area in order to address issues at this neighbourhood level, we believe this outcome could also be achieved through the use of a more sophisticated needs based allocation system and management transfer scheme. In Britain local authorities have used this approach to prioritise, for instance, the housing needs of key workers and offenders

⁶ See Young, G; O'Sullivan, T & Gibb, K (2010) Northern Ireland Housing Market Areas, NIHE and Palmer, J. Housing Needs and Housing Market Assessment; A Comparative Review of Methods used in England and Northern Ireland. North Harbour Consulting. (2007)

leaving prison but we believe further discussion is required in the NI context to consider such a potentially pervasive development.

5. Conclusion

In conclusion, HRS welcomes the publication of this review and the research that has been carried out by the University of Ulster and University of Cambridge. As we have noted in this response we believe this review needs to consider a wider range of related housing strategies and societal circumstances and engage directly with applicants on the waiting list to elicit their experience of using the current allocations system. We also believe there is a need to review and clarify the purpose of social housing provision before designing allocation systems which may not be fit for purpose. The fundamental principles of this role and function should be delineated based for example on social need, universal access, transparency, affordability, and participation. As stated, we would contend that the underlying problem with the allocation of social housing is ultimately due to the historical lack of supply and consequent high demand for such properties. Changing the basis of the allocation scheme will not significantly address housing need and the aspirations of applicants unless there is a significant increase in social housing.

In general, we strongly believe that priority should always be given to those with the greatest need when designing an allocations scheme. The proposed consideration of other priority factors, such as promoting economic regeneration and ending segregation, could weaken this fundamental principle and over-complicate the assessment process, potentially exposing landlords to allegations of bias. While not opposed to the achievement of such policy priorities, we are sceptical that such changes to the current needs focused principle of allocations policy could be met without a significant increase in the supply of social housing. We are supportive of the use of CBL systems and date-orders to prioritise applicants which, it is argued by the researchers, could prevent 'queue jumping' and 'points chasing' by applicants. In regard to the latter issue, we believe that this implied criticism of applicants is undeserved and that it is perfectly legitimate for applicants (and advice agencies) to strive to maximise the award of points entitlements.

We will be pleased to provide additional information in support of this response. For further information contact:

Peter O'Neill
Policy & Participation Officer
Email: peteroneill@housingrights.org.uk
Tel: 028 90245640

Nicola McCrudden
HRS Policy Manager
Email: Nicola@housingrights.org.uk
Tel: 028 90267919