

Consultation report – housing allocation proposals

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1. Introduction

- 1.1 This report sets out the findings of the consultation on proposals for a revised housing allocation scheme. Cabinet approved the proposals for consultation in December 2014 and the consultation ran for a 12 week period from 12 January to 5 April 2015.

2. Key findings

- 2.1 The analysis of the responses from the online and community researcher survey shows there is a strong level of support for:
- Awarding points for **waiting time** (**79%** in favour)
 - Rewarding **long-term residence** (**80%** in favour)
 - **Local connection** requirement (**77%** in favour, although split between 5 out of 7 years (47%) and 3 out of 5 years (29%))
- 2.2 There was also a good level of support for:
- Changing the **health and housing needs** assessment (**65%**)
 - Giving more **priority** to **overcrowded households** (households with one bedroom less than their assessed bedroom need) (**67%**)
 - Introducing **qualification criteria** to prevent households with **no housing need** from joining the housing register (**55%**)
 - Changes to the **overcrowding and bedroom assessment** to benefit **families with young children** (**54%**)
- 2.3 Some policy proposals were supported by the survey, but concerns were raised in other parts of the consultation and engagement process:
- Savings and assets test: **60%** of respondents supported a test, but in DMC meetings, discussions with RPs and analysis of the responses to the open questions in the survey showed that the level of **£20,000** was felt to be too low.
 - Exceptions panel: there was a good level of support for removing the exceptions panel (**52%**) in the survey, but concerns were raised about how the scheme would deal with exceptional decisions. This was particularly raised by the DMCs and voluntary/advocacy groups.
 - Expecting **older children** to continue **sharing a bedroom** (**61%**) regardless of age was also well supported although during wider discussions concerns were raised around children with disabilities or additional needs being expected to share a bedroom.

3. What we did

- 3.1 The consultation aimed to canvass the views of a wide range of groups, including those on the current housing register, existing Council tenants, other Camden and out of borough residents, registered providers (with whom we are statutorily required to consult), third sector organisations and Council staff.
- 3.2 The consultation comprised the following elements:
1. An online survey.
 2. Face-to-face interviews with over 800 people through Camden's community researcher team.
 3. Attendance at local voluntary and community groups.
 4. Council staff consultation meetings.

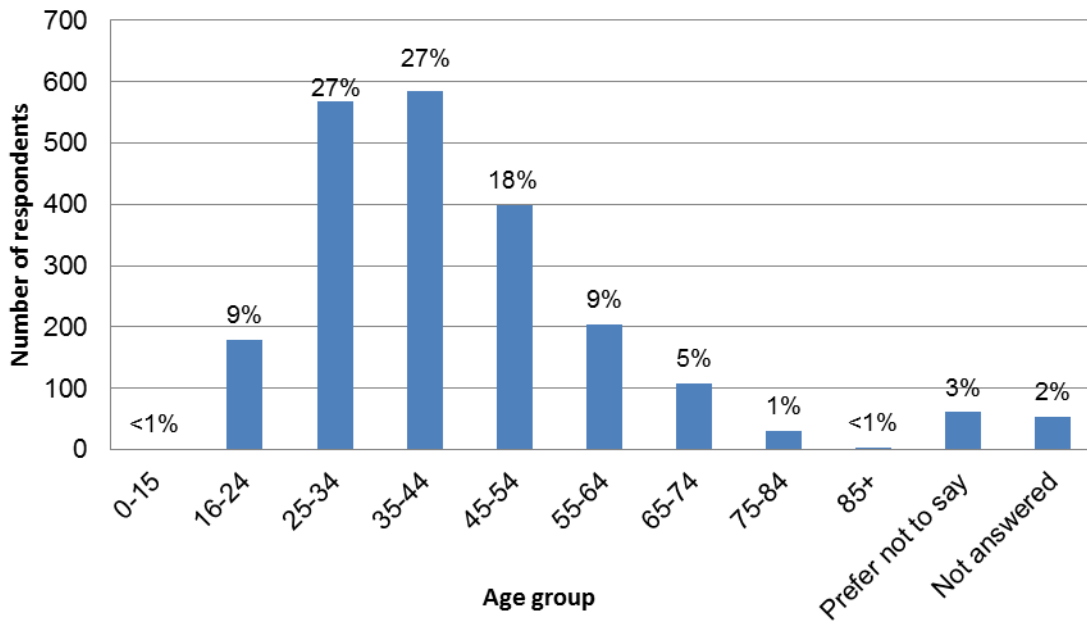
5. Special events aimed specifically at Camden District Management Committees, the voluntary sector and partner housing associations.
6. Five focus groups with those who expressed an interest in taking part in a detailed discussion when completing the survey or attending another meeting.
7. Provision of consultation material in large print and easy read format to engage with hard to reach groups.

4. The survey

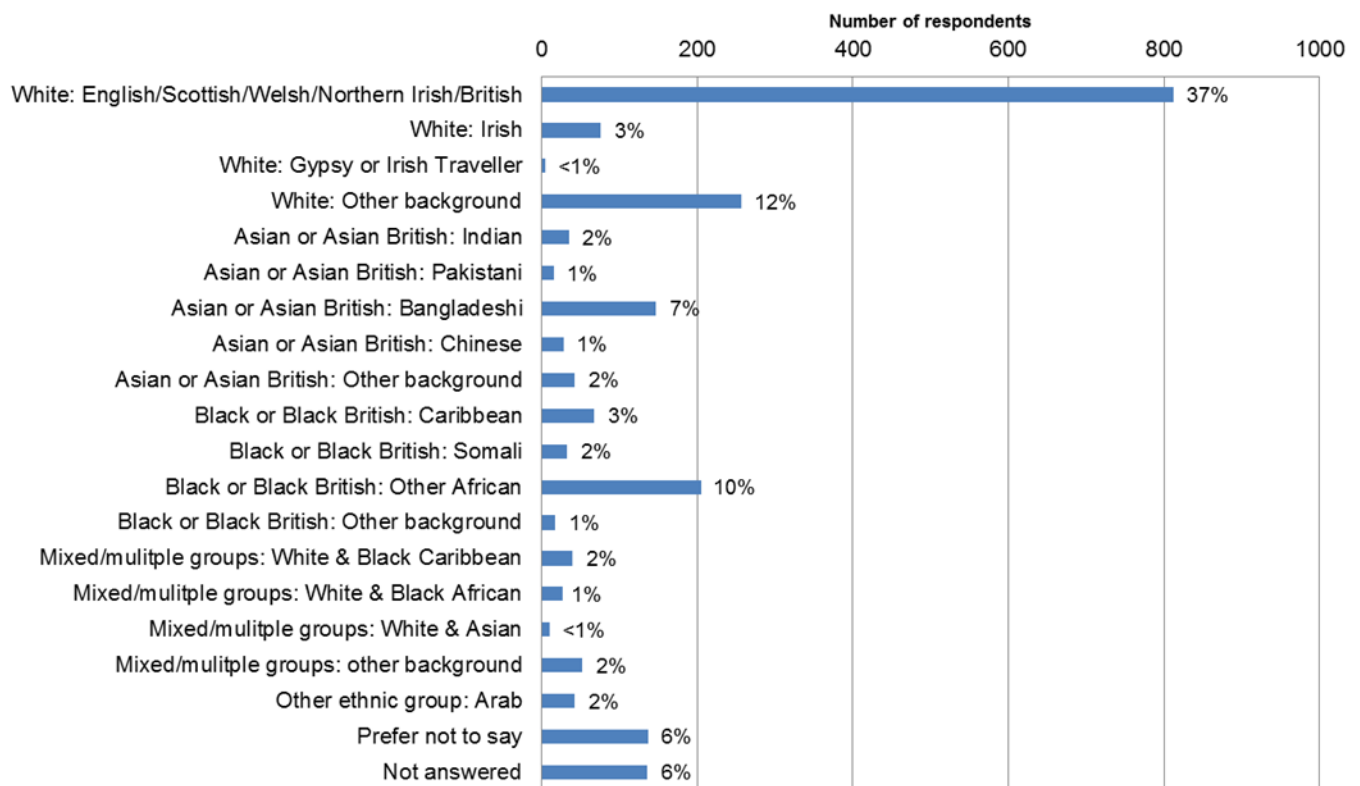
- 4.1 The survey was designed to seek detailed views on the proposed changes to the allocation scheme. It was themed around four areas, closely linked to Camden Plan objectives: creating mixed, strong and sustainable communities, help for children and families, promoting health and wellbeing and making our scheme fair and transparent.
- 4.2 The survey was available online from 12 January to 5 April 2015 and was widely promoted, on the Council and Home Connections websites, through email to voluntary organisations, TRAs, TMOs and 16,000 applicants on the housing register. Posters were displayed in libraries, community hubs, hostels, bus shelters and GP surgeries.
- 4.3 Camden's community researchers also conducted 844 face to face interviews with members of the public to maximise responses and target harder to reach groups in community hubs and libraries.

5. Who took part in the survey?

- 5.1 In total, 2,191 responses were received (1,347 through the online survey and 844 through community researcher interviews).
- 5.2 The graphs below show a breakdown of respondents by age, ethnicity, gender, disability and tenure. A full analysis of the protected equalities groups is included at Appendix 1.
- 5.3 The age profile of respondents broadly reflects the borough Census data and households on the housing register.

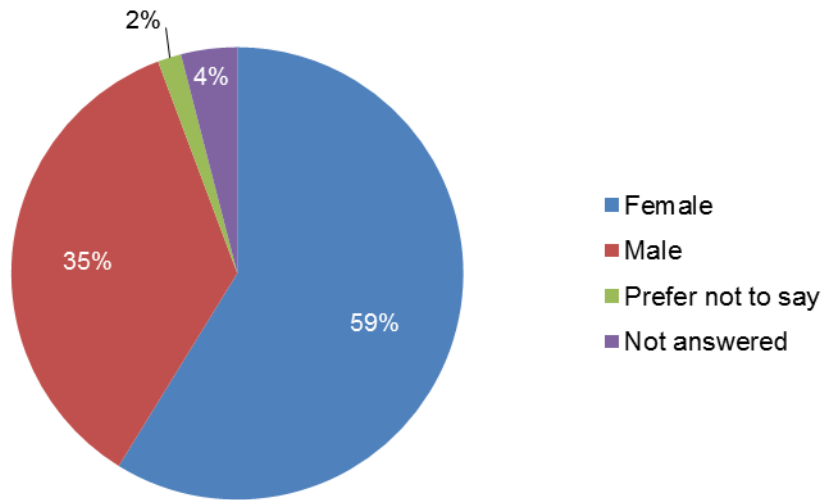


5.4 The ethnic background of respondents shows that white households are underrepresented in responses compared to 2011 Census data (55% of respondents compared to 66% of households). The ethnic profile of respondents broadly reflects the breakdown of households on the housing needs register

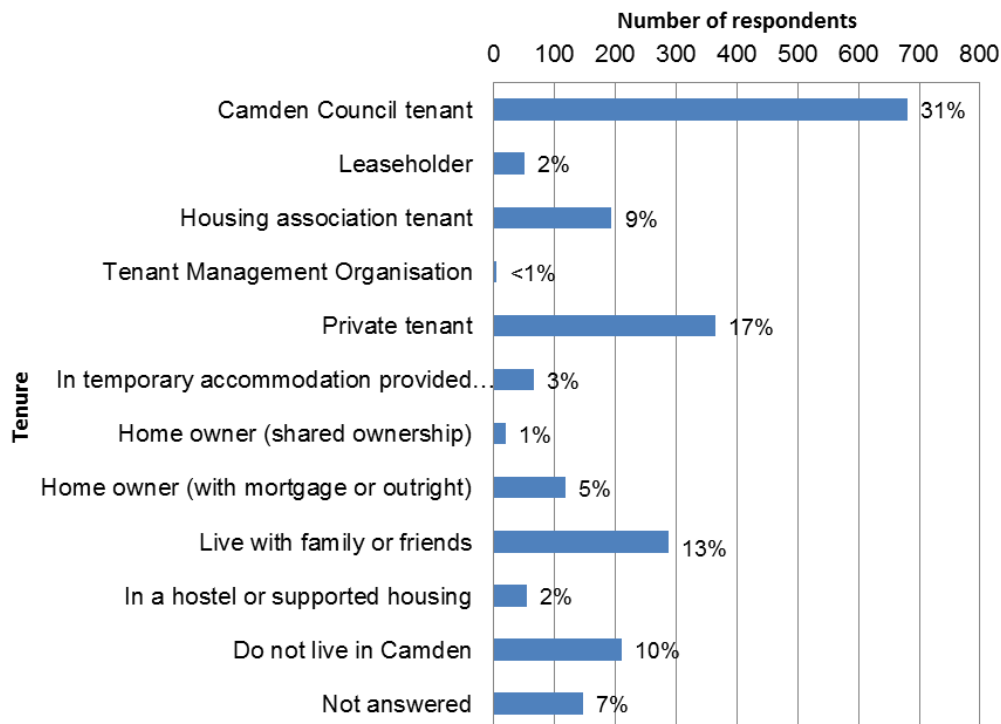


5.5 The gender profile shows that female respondents are overrepresented compared to the Census data – 59% respondents compared to 51% in the

Census. However the response breakdown is closer to the profile of those on the housing needs register where 56% are female.



5.6 A higher proportion of respondents are Council tenants compared to the tenure breakdown across Camden overall – 31% of respondents compared to 23% of households in the 2011 Census. Housing association tenants make up around 10% of households and 9% of respondents. Home owners and private rented tenants each make up approximately one third of households in the borough but are under-represented in the survey responses (with 6% and 17% of respondents respectively) The higher response rate from existing Council tenants can be explained by the impact of the proposed changes on this group.



5.7 45% of respondents reported that they are on the current housing register, 53% are not on the register and 2% preferred not to say.

6. Responses to key policy proposals - building mixed strong and cohesive communities

6.1 Residency qualification

- 6.1.1 The consultation responses showed strong support for introducing a local connection test with 77% in favour of the proposal. However, this support is split between the two options with 47% in favour of 5 out of 7 years and 29% in favour of 3 out of 5 years. Almost a quarter of respondents (23%) did not support either option and 1% did not give a response to this question.
- 6.1.2 Council and housing association tenants more likely to be in favour of the longer qualification (54%) and those on the current housing register are also more supportive of a longer residency requirement (52%).
- 6.1.3 The DMCs were generally supportive of a local connection test, with 41 votes cast in favour across the five meetings. Holborn DMC expressed concerns how the proposal could potentially incentivise Part VII applications, particularly those living in the private rented sector who have been affected by welfare reform. Exempting Part VII accepted households from the residency requirement should prevent any adverse impact and this will be monitored once the new scheme is implemented.
- 6.1.4 Some registered providers also highlighted the potential impact of the proposed residency qualification on London's diverse and vibrant communities and felt that introducing residency criteria did not recognise the needs of newly arrived communities. There were additional concerns raised by the Citizens Advice Bureau about the impact on vulnerable households, for example people who need their home adapted who may have to wait to apply for housing for a long period of time.
- 6.1.5 As part of the introduction of a local residency test, the Council will need to be sure that alternative options and advice are made available to those who will no longer qualify to join the register.

6.2 Waiting time and long term residence

- 6.2.1 80% of respondents support rewarding waiting time linked to needs points and giving a higher award to those who have lived in the borough for 10 out of the last 15 years.
- 6.2.2 Unsurprisingly a slightly higher proportion of those on the register (82%) and Council tenants (84%) support this proposal.
- 6.2.3 In the analysis of the open questions in the online and community researcher survey, 233 respondents wanted to award higher priority to long-term residents over newcomers.
- 6.2.4 Overall the DMCs supported the new approach to waiting time and long term residence annual awards with 26 and 38 votes in favour respectively. Gospel Oak DMC expressed some concern about the proposed changes to waiting time points during their discussions and there were three votes against the

increased long term residence award at the Camden Town and Holborn DMCs.

6.3 Studios and one bedrooms for some groups of applicant

6.3.1 There was a good level of support for extending the groups of applicants who can apply for both studio and one bedroom properties, both in the survey responses and from the DMC meetings.

6.3.2 The survey results show:

- 73% support for over 40s although some concerns were raised about the equalities impact of this proposal.
- 58% support for sons & daughters of tenants moving due to regeneration.
- 62% support for sons & daughters of tenants moving to smaller properties.
- 55% support for those taking over a tenancy from a relative who can no longer manage their tenancy.

6.4 No need

6.4.1 Overall respondents support the proposal to prevent households in low or no housing need from joining the housing register, with 55% in favour. 30% are against this proposal, 16% neither agree nor disagree and 1% did not respond to the question.

6.4.2 Those who own their home (either through shared ownership, with or without a mortgage) and those living in temporary accommodation provided by the Council are more likely to be in favour of this proposal (65% and 61% respectively).

6.4.3 Of 23 votes cast on this proposal across the five DMCs, 13 were in favour of the no need proposal, 8 were against and 2 were undecided.

6.5 Savings and assets

6.5.1 The results of the survey show that 60% of respondents support restricting those with a higher level of savings and assets from joining the housing register. However the proposed threshold of £20,000 was challenged widely by survey respondents, DMCs and registered providers. It was felt that the threshold did not support the Council's wider agenda to promote sustainable communities and did not provide sufficient incentive to take up employment.

£20,000 is not enough for a deposit and you will just make anyone working feel that council housing is only for the really poor.

6.5.2 There was very little support from the DMCs, apart from Camden Town where out of 10 votes cast, 4 were in favour and 1 was undecided.

6.5.3 As a direct result of feedback from the consultation and further discussion with registered providers as statutory consultees, this threshold has been revised and a proposal for £32,000 will be put to Cabinet for decision as part of the allocation scheme. This level better reflects the cost of securing accommodation on the private market either through renting or securing a mortgage in an area within commuting distance of Camden.

6.6 Unintentionally homeless

- 6.6.1 53% of respondents support the proposal to prevent intentionally homeless households from joining the housing register. 24% do not support this proposal and 21% neither agree nor disagree.
- 6.6.2 Concerns were raised by Holborn DMC and Mind Camden about the impact of this proposal on vulnerable groups, particularly those with mental health problems. Camden's assessment process for intentionally homeless decisions is very robust and mindful of the needs of vulnerable groups. It is anticipated that very few households will be disqualified due to intentional homelessness and this will be kept under review, ensuring that vulnerable households are not adversely impacted.

7. Responses to key policy proposals - help for children and families

7.1 Proposals for families with younger children

- 7.1.1 Just over half of respondents (53%) support the proposals to help families with younger children, including counting all children aged 5 and under in the bedroom and overcrowding assessment, awarding severe overcrowding points to families living in studios and continuing to award shared facilities points to families with young children.

Overcrowding is a serious issue especially when there are children because children need space be it to work or play

7.2 Proposals for families with older/adult children

- 7.2.1 61% of respondents support the changes in the bedroom assessment which mean that children of the same sex will be expected to share a bedroom regardless of their age. However, there were concerns raised across a number of meetings, including the Parent Council, about what is on offer for adult children living in the family home.
- 7.2.2 Holborn DMC were also concerned about sharing rooms where there is a large age gap.

I feel it is more important for adult sons and daughters not to have to share a bedroom than it is for younger children. My children shared a room when young which was fine but as teenagers it is far more problematic. Again, this can break families up and force young adults out of the home as they will want to move out earlier.

- 7.2.3 The Quality of Life Panel also expressed concern about children with disabilities who need their own room under the new proposals. To reflect these concerns, the requirements for being assessed for an additional bedroom have been revised and now include provision for specific circumstances where there are particular behavioural issues.

7.3 Tackling overcrowding

7.3.1 There is strong support for the full range of proposals aimed at tackling and alleviating the effects of overcrowding. 81% of respondents were in favour of offering flexibility to overcrowded households in the size of property they could bid for. Two thirds of respondents supported extending the overcrowding assessment to households who have sole access to the same number of rooms as their bedroom need assessment. Across the DMC meetings, these proposals were widely supported.

7.3.2 At a special meeting held for households living in temporary accommodation, participants felt that the Council should also award overcrowding points to households in temporary accommodation, in line with the proposal to award severe overcrowding points to families in studios. This would help these households bid on accommodation and also reflect the conditions such families are living in.

7.4 Special guardianship

7.4.1 During the consultation, awarding priority to special guardians was raised, both in the survey, by members of Camden staff (from Children Schools and Families) and by Camden Association of Street Properties. It was reported that special guardians are often caring for younger family members in overcrowded conditions and additional priority should be given to this group.

8. Responses to key policy proposals - promoting health and wellbeing

8.1 Medical points assessment

8.1.1 There was good support for a two tier medical assessment process, with two thirds of respondents in favour of this proposal.

8.1.2 However some concerns were raised, particularly by the voluntary sector and DMCs, about ensuring that mental health conditions are adequately pointed in the new scheme.

Health needs and psychological needs should be seriously noted and tenants who have such needs ought to be given some kind of priority.

8.1.3 Some voluntary sector organisations also sought reassurance that multiple medical issues would be acknowledged and awarded sufficient priority under the new scheme.

8.2 Carers

8.2.1 Over three quarters of respondents support more recognition for carers and the proposals in the new scheme reflect discussions with Camden Carers around flexibility on any additional bedroom, including carer as part of household and a higher points award for those giving or receiving long-term substantial care.

9. Responses to key policy proposals - a fair and transparent scheme

9.1 Proposals for a fairer scheme

9.1.1 There was strong support for proposals to make the scheme fair and more transparent:

- 91% were in favour of making clear who can be on a housing application (2% were not in favour and 5% neither agreed nor disagreed with the proposal.) There was unanimous support from the DMCs on this proposal.
- Almost three quarters of respondents (73%) agreed that an applicant should only be on one housing application (14% did not support this and 12% neither agreed nor disagreed with the proposal).
- 79% of respondents felt that support should be offered to non-bidders. Some respondents, including registered providers, felt that stronger action should be taken where households were consistently failing to bid, such as fixed term suspensions from the housing register.
- 83% of respondents supported the proposal to introduce a tie break for applicants with the same number of points. One housing association raised concerns over how this may affect those who have recently served in the armed forces who would not benefit from accruing waiting time points. They also felt that having a fixed policy on cases with equal points did not allow flexibility for the Council to meet its wider strategic priorities.

9.2 Exceptions Panel

9.2.1 However there were concerns raised across the board about the proposal to remove the exceptions panel. Whilst recognising that the new scheme would deal with the majority of cases, there was concern expressed about how exceptional cases would be dealt with and just over half (53%) of respondents supported the removal of the exceptions panel. One in five respondents were against the proposal and 27% neither agreed nor disagreed. Concerns were particularly raised by advice and advocacy groups and the DMCs who voted 10 in favour, 8 against and 2 undecided on this proposal.

A web form is never going to fully meet everybody's requirements or ask all of the right questions or have the answers. The exceptions panel is definitely still necessary.

10. Feedback from key groups

10.1 Responses from registered providers

10.1.1 Responses were received from 32 registered provider staff, including six formal submissions from providers (Genesis, Origin, One Housing Group, Soho, St Mungos and Peabody).

10.1.2 Nine providers (One Housing, Genesis, L&Q, Origin, Circle, Peabody, Central & Cecil, Odu-Dua and Octavia) also attended a session to discuss the proposals in detail.

10.1.3 Four of the six written responses from registered providers favoured a local connection requirement of 3 out of the last 5 years as it was felt that a shorter test better reflects the more transient and changing nature of London's communities. One RP raised the issue of additional preference for members of the armed forces and how any local connection requirement would impact on this group. There will be suitable exceptions made to the qualification criteria to enable us to meet the housing needs of the members of the armed forces.

10.1.4 Concern was also raised about introducing a tie-break and limiting the flexibility of the scheme to meet housing need and the wider strategic priorities of the Council (see above Section 4: a clear and transparent scheme).

10.1.5 At the meeting with providers, several issues were raised as areas of concern:

1. There was support for the introduction of sanctions or other penalties for non-attendance at viewings or refusal of offers. This was also raised in written submissions. Without sanctions, RPs would continue to be concerned about the impact of CBL on their void turnaround and also on applicants expectations being artificially raised about the type and location of social housing for rent, particularly for those at the top of the housing list. Some RPs use fixed suspensions to prevent those at the top from blocking other applicants. Others have offered wider support around school places and other practicalities associated with moving home.
2. The proposed savings and assets threshold of £20,000 was felt to be too low, with particular concern about sheltered applicants (where providers may already be experiencing issues with demand) or those paying for their own care. It was felt that an income test would better promote the idea of mixed and stable communities to encourage households into work and away from benefit dependency.
3. There was a good discussion around how the scheme can help to deliver mixed communities alongside other products such as shared ownership and affordable rent which need to be signposted to those who do not qualify to join the housing register. Better information on mutual exchanges and transfers should also be made more widely available. Consideration should also be given to the future impact of the GLA topslice on discounted and capped rents for new build properties.

10.2 Camden staff

10.2.1 Two lunchtime briefings were held for Camden staff and around 40 staff took part in the sessions. Members of staff were encouraged to complete the online survey and 98 staff responded.

10.2.2 There was strong support for introducing a local residency requirement and the new proposal for rewarding waiting time. Staff responses were more likely to support the proposal to prevent those who have no or low housing need from joining the housing register (60% compared to 55% overall).

10.3 Voluntary sector

10.3.1 A meeting was held for voluntary sector organisations and they were invited to participate in the online survey through a direct email from the Third Sector Team. The main issues raised include concern about the removal of the exceptions panel, the introduction of qualification criteria to prevent intentionally homeless households from joining the housing register and ensuring that the new medical assessment process meets the needs of those with multiple medical problems. One respondent to the survey raised concerns about ensuring disabled people living in the private market but who are unable to access a suitable (adapted) home are awarded priority under the scheme.

10.4 Temporary accommodation

10.4.1 A meeting was held for households living in temporary accommodation both in Camden and out of borough.

10.4.2 The main issues arising from the meeting were:

1. Concern that households living in out of borough temporary accommodation would be disadvantaged by a residency qualification.
2. It needs to be clear what information will be used in making decisions around the anti-social behaviour qualification criteria, how it will be implemented and if there will be any time limitations attached.
3. There was no consensus on the level of the proposed savings and assets test. Most participants felt that if an applicant had £20,000, they should use this to resolve their own housing needs. However some felt that £20,000 was too low and would discourage people from working or saving.
4. The group proposed that households living in temporary accommodation should be eligible for overcrowding point.
5. There needs to be clear information on the implications of accepting an offer in the private rented sector, including location of properties and affordability.
6. As anxiety and depression are particular issues for people living in temporary accommodation, especially long stayers, it was felt that mental health needs should be better recognised in the medical assessment process.
7. The scheme needs to recognise that those in temporary accommodation have the most extreme needs and they are trapped “not just in a housing situation, but in a lifestyle”.

10.5 Hostels

10.5.1 Meetings were held for both residents and staff and there was a good level of support for the proposals in the context of the prevailing housing market in Camden.

10.5.2 Overall hostel staff and residents were supportive of a shorter local connection test of 3 out of 5 years. There were concerns raised about the removal of medical C awards and how this would impact on applicants chances of rehousing.

10.7 Other groups

10.7.1 The health sector, local schools, voluntary and community organisations, solicitors and law centre staff, tenants' and residents' associations, TMOs, private landlords and elected members also responded to the online survey.

10.8 Attendance at other meetings

10.8.1 Staff from the allocations working group attended several local voluntary and community groups or events. These included the Camden Association of Street Properties, the Parent Council, Learning Disability Service User Reference Group (Surge), the Sensory Needs Forum, the Quality of Life Forum, the Children's Trust Partnership Board, Camden Advice Partnership, Homeswap event, hostel meetings, including RAMs, Camden People First, Camden Carers.

10.8.2 At some meetings, the council promoted responses to the survey and answered questions. At other events, the council gave a full presentation on the proposals were able to formally record the group's views on the consultation.

11. Individual responses including depositions

11.1 Two deputations were received as part of the responses to the consultation and a formal submission was made by the Corporate Parenting Board.

11.2 The first deputation came from a group of Camden carers. Their main proposals were to award additional priority to those giving or receiving care, make sure that carers were not subject to any residency test and to give flexibility in the scheme for those entitled to an additional bedroom (this could be at both the caregiver's home or at the home of the person receiving care).

11.3 The second deputation came from a group representing parents in Camden 'Not Just One Mum'. The group's main proposals for the allocation scheme are:

- A community rule. Priority for needing an area for school and support.
- Mothers and children and first time council tenants before downsizers and non-priority transfers.
- Points protection for families in temporary housing waiting 5 or more years.
- One-bed and studio homes allowed to non-priority, community and creative workers, via quota and a panel.

11.4 The formal submission from the Corporate Parenting Board broadly supported the proposals for the allocations scheme and felt that care leavers should be automatically awarded long-term residence points (based on their needs points) in recognition of the fact that they may have been placed in care out of borough without any choice.

12. District Management Committee feedback

12.1 Gospel Oak DMC

- 12.1.1 There was a wide discussion of housing issues, such as the decline in social rented stock, the lack of affordable housing and the impact of welfare reform, particularly using discretionary housing payments to support under-occupier moves where households are affected by the total benefits cap.
- 12.1.2 Some members raised concerns about the proposed change to waiting time points, no age limit on siblings of the same sex sharing a bedroom and making sure that any medical assessment process supports those with mental health issues.
- 12.1.3 A more personal service for applicants and moving verification of applications to the beginning of the process was popular.

12.2 Camden Town DMC

- 12.2.1 There was strong support for prioritising those in housing need and ensuring that we safeguard vulnerable groups, including those fleeing domestic violence.
- 12.2.2 Concerns were raised about the removal of the exceptions panel and what arrangements would replace this to ensure exceptional cases are dealt with. The issue of young adults sharing being expected to share a bedroom was also felt to be unfair by this group.
- 12.2.3 The Council needs to provide information on lettings to give applicants clear information on what their chances are of securing a two or three bedroom property.
- 12.2.4 Concerns were also raised about disabled clients and access, particularly in relation to viewings.

12.3 Holborn DMC

- 12.3.1 There was wide discussion around the proposed scheme, including the approach taken by other London boroughs, early results from the consultation and the approach to be taken for implementing the scheme, including the communications plan and managing the expectations of applicants going forward. Clear information should be made available on the advice offer, particularly for those who speak English as an additional language and currently use third party advocacy services for help with their housing application.
- 12.3.2 It was felt that there should be more profiling and analysis of data on the housing register, particularly relating to bidders and non-bidders.
- 12.3.3 In relation to the proposed residence qualification criteria, it was felt that there would be an adverse impact on people living in the private rented sector who have only lived in Camden for 3-4 years and who have been affected by the

benefits cap. This group should be given appropriate housing advice and support. There was also concern that homeless applications could rise where people do not meet the residency criteria. As these households would then most likely be placed in accommodation outside of Camden, this will have a negative effect on local communities.

12.3.4 There was good support for the proposals to improve conditions for overcrowded families. However there were concerns relating to the proposal around children of the same sex being expected to share a bedroom regardless of their age. Suggestions were made to include exceptions to this proposal, for example where there are behavioural concerns or there is a large age gap between children.

12.3.5 Although there was support for the proposal to disqualify intentionally homeless households from the housing register, it was felt that there should be exceptions relating to those with mental health problems.

12.4 Hampstead

12.4.1 There was a good discussion of the proposals and it was felt that the housing register should be more actively managed. There was concern expressed that those who are not bidding may need more support.

12.4.2 There was general agreement that more could be done to process voids promptly and performance should be tightly monitored in this area.

12.4.3 Although there were concerns expressed at the proposal £20,000 threshold for savings and assets, no one suggested that there should not be a threshold at all.

12.4.4 In relation to the proposals to help children and families, there was a discussion about the limited options available to young adults who are starting out on their own. It was suggested that adult sons and daughters sharing rooms in the family home should be awarded points relating to overcrowding. It was also felt that in focussing on families with younger children, there could be an unintended consequence of encouraging people to have children to qualify for housing.

12.5 Kentish Town

12.5.1 There was a good discussion around the lack of supply of genuinely affordable housing both in Camden and London. The group felt that council housing should not become a residual tenure and supported the Council's priority of promoting mixed and stable communities.

12.5.1 Linked to the wider discussion around affordable housing, there was concern about the proposed savings threshold being too low and not in line with Council's intention to promote mixed communities.

12.6 Summary of DMC feedback

12.6.1 The table below summarises the feedback from the DMC meetings held in March 2015. Each DMC voted on the key proposals and individual member votes are given below.

Proposal	Support?	Kentish Town	Camden Town	Gospel Oak	Holborn	Hampstead	Total
Building mixed strong and cohesive communities							
Introduce a local residence requirement	Yes	7	13	5	4	12	41
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Disqualify those in low or no housing need (30 points or fewer)	Yes	0	7	2	1	3	13
	No	3	0	0	1	4	8
	Undecided	2	0	0	0	0	2
Introduce a savings threshold of £20,000	Yes	0	4	0	0	0	4
	No	6	5	5	5	9	30
	Undecided	0	1	0	0	0	1
Disqualify intentionally homeless households	Yes	5	7	1	0	5	18
	No	0	0	1	2	1	4
	Undecided	1	0	0	0	0	1
Reward waiting time based on needs points	Yes	6	5	6	1	8	26
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Reward long term local connection based on needs points	Yes	6	13	5	4	10	38
	No	0	2	0	1	0	3
	Undecided	0	0	0	0	0	0
Studios and 1 beds for single people moving due to regeneration	Yes	7	7	4	2	9	29
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Studios and 1 beds for single people who are downsizing	Yes	6	7	3	2	8	26
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Studios and 1 beds for single people who are succeeding to a tenancy	Yes	5	5	6	2	7	25
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Studios and 1 beds for single people aged 40+	Yes	3	2	2	0	9	16
	No	0	0	0	1	1	2
	Undecided	0	0	0	0	0	0
Help for children and families							
Count all under 5s in bedroom need and overcrowding assessments	Yes	3	6	2	1	0	12
	No	7	0	0	1	0	8
	Undecided	1	0	0	0	0	1

Proposal	Support?	Kentish Town	Camden Town	Gospel Oak	Holborn	Hampstead	Total
Severe overcrowding points for families in studios	Yes	3	5	2	5	0	15
	No	0	0	0	0	0	0
	Undecided	1	0	0	0	0	0
Children of same sex to share bedroom regardless of age	Yes	1	3	0	2	0	6
	No	3	5	2	2	0	12
	Undecided	1	0	0	0	0	1
Flexibility on accommodation size for overcrowded households	Yes	6	8	3	5	7	29
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Change overcrowding assessment to include households with one bedroom less than we say they need	Yes	6	6	2	1	6	21
	No	0	0	0	0	0	0
	Undecided	0	1	0	0	0	1
Improving health and wellbeing							
Change medical points assessment to 2 levels	Yes	4	5	2	2	3	16
	No	2	0	0	1	1	4
	Undecided	0	0	0	0	0	0
Give more recognition to carers	Yes	6	4	5	2	8	25
	No	0	0	0	0	0	0
	Undecided	0	1	0	0	0	1
Making the scheme clear and transparent							
Clearly define who can be on a housing application	Yes	5	7	4	5	7	28
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0
Make sure applicants only on one application	Yes	4	3	5	4	5	21
	No	0	4	0	1	1	6
	Undecided	1	0	0	0	0	1
Remove the exceptions panel	Yes	2	3	0	1	4	10
	No	2	3	1	1	1	8
	Undecided	1	0	1	0	0	2
Give advice to non-bidders	Yes	3	4	1	1	6	15
	No	1	0	0	0	0	1
	Undecided	1	0	1	0	0	2
Introduce clear way to decide between applicants with equal points	Yes	5	6	2	2	8	23
	No	0	0	0	0	0	0
	Undecided	0	0	0	0	0	0

13. Focus groups

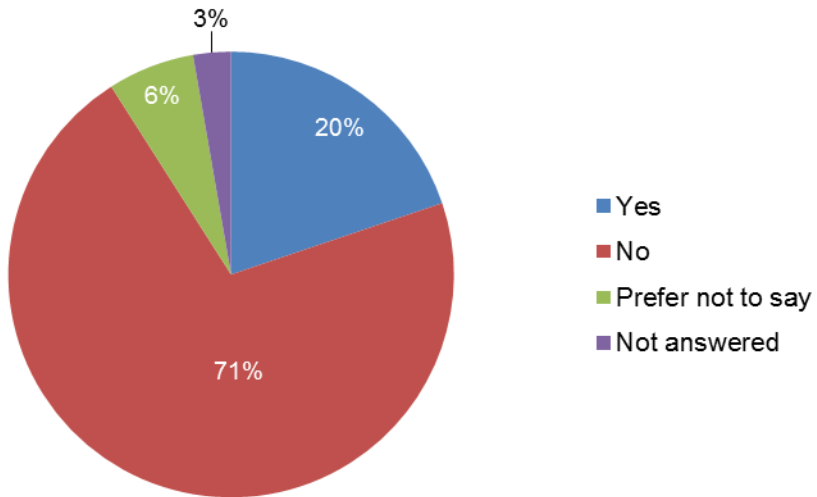
- 13.1 Five focus groups were held in mid-March 2015 to allow residents to discuss the proposals for the allocations scheme in more detail.
- 13.2 Those interested in participating in a group indicated their interest via the survey or email to the Housing Strategy Unit. The sessions were held in community centres across the borough and at the Town Hall.
- 13.3 These sessions focused on 5 main questions:
1. How long should you live in the borough before you can join the housing register?
 2. How should we assess medical needs?
 3. How should we decide how many bedrooms a household needs?
 4. Should anyone be able to join the housing register? Or should you be in housing need?
 5. What are your priorities?
- 13.4 Across the focus groups, there was support for a minimum local connection requirement for those joining the housing register although there was no clear consensus on how long this should be for. Some felt that those living in the borough for longer periods of time should be awarded additional priority. Others expressed concern that requiring applicants to wait for a certain amount of time would create a bottleneck in the system and put pressure on other services.
- 13.5 In terms of proposed changes to medical points, there was concern about how this would affect applicants who have no other points. The issue of potential abuse of the medical assessment process was also raised and there were discussions about who was best placed to carry out an unbiased assessment – one group felt that this should be done by GPs known to the applicant.
- 13.6 It was strongly felt across all groups that children should not have to share a bedroom with their parents (in support of the proposal that all under 5s should be counted in assessing bedroom need and overcrowding). However it was also felt that older children needed their own space and privacy. One group thought it was reasonable to expect same sex siblings to share if aged over 10. Alternative solutions are needed for adult sons and daughters so that they can access the housing market and move out of the family home.
- 13.7 There was good support for limiting the housing register and disqualifying those who are not in housing need. However there should be exceptions, including those in temporary accommodation, key workers, families with children aged under-18 and those who commute to Camden to work or care for family members. One group discussed the idea of giving a financial incentive for people coming off the register and piloting a scheme linking housing to work in the borough.

13.8 Other priorities that were discussed include:

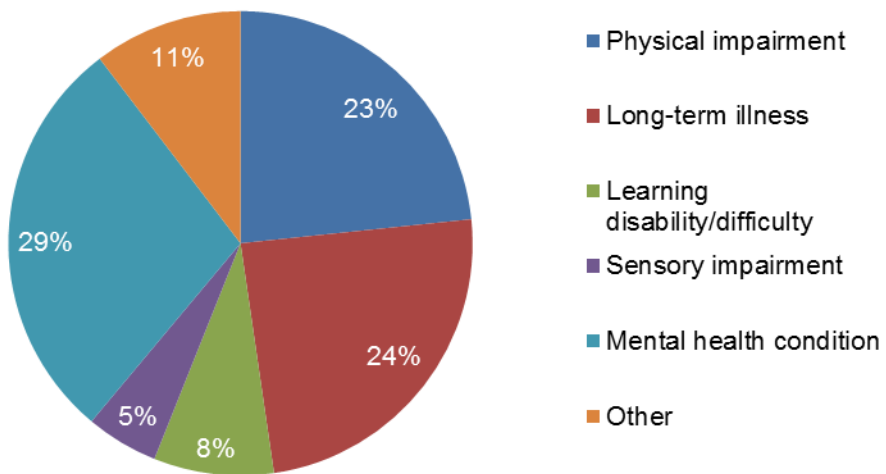
- promoting health and wellbeing.
- recognizing community contribution.
- meeting the needs of families.
- stopping the sell-off of social housing.
- working with landlords in the private rented sector to improve conditions, prevent evictions and reduce rents.
- encouraging those with high incomes to meet their own housing needs.
- giving extra priority to long-term residents, giving more consideration to the severity of an applicant's medical condition.

Appendix 1: Protected groups

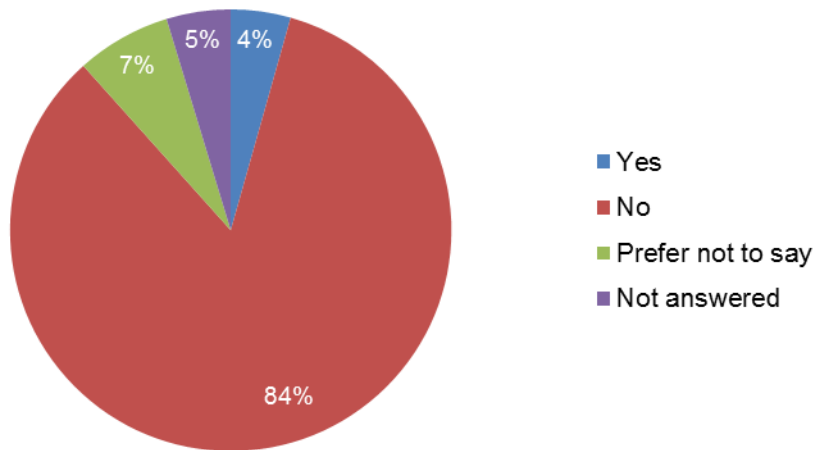
Disability



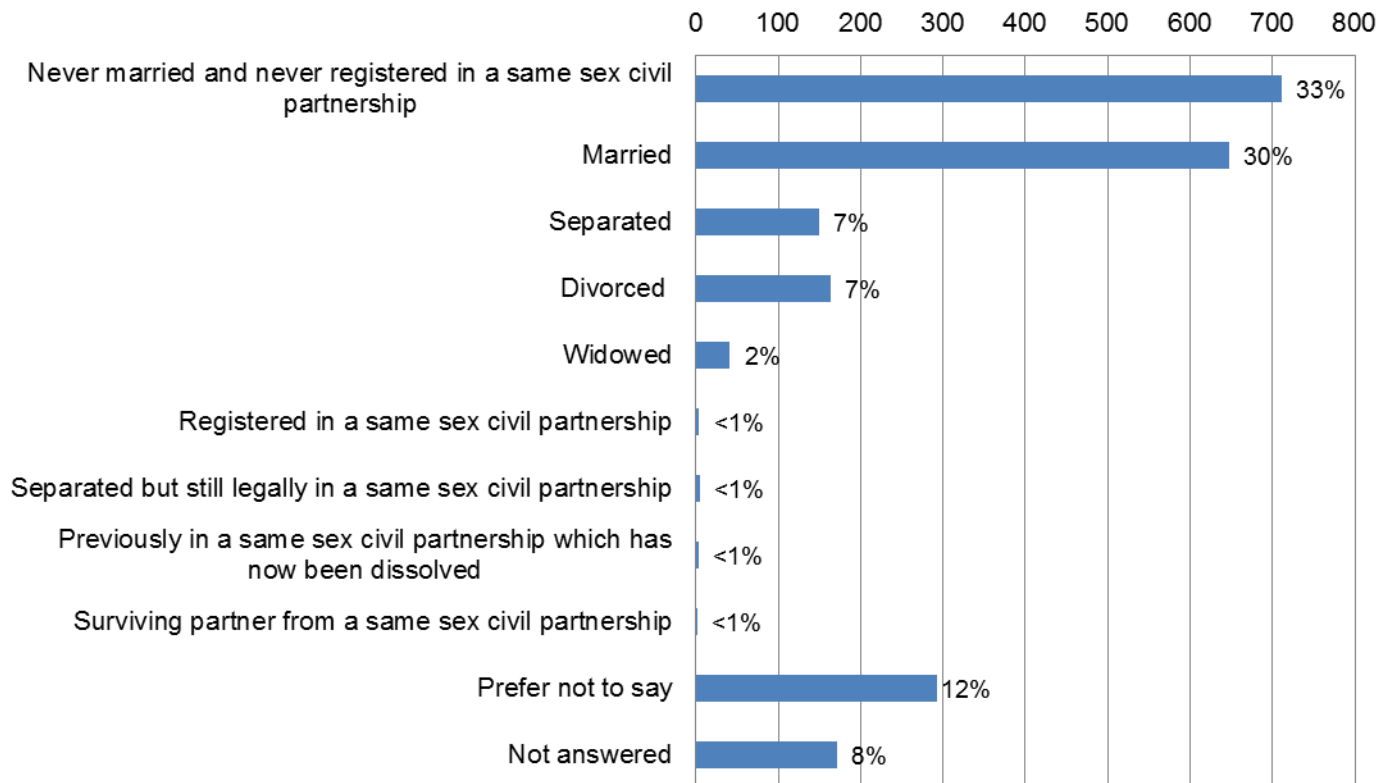
Type of disability or condition



Gender reassignment

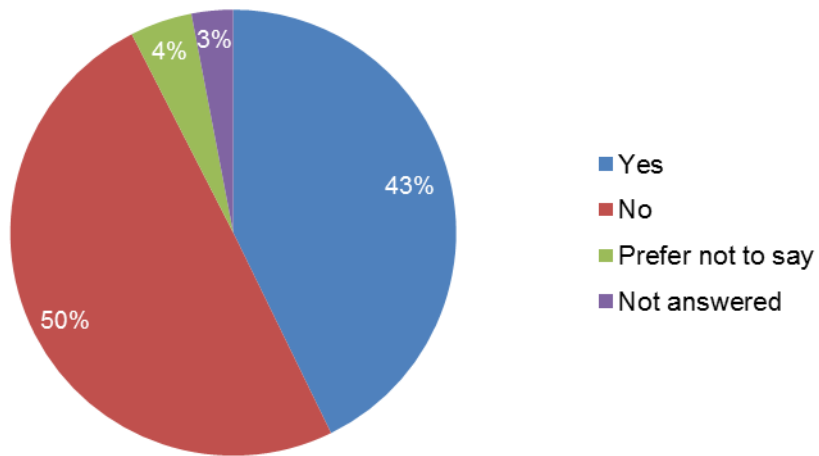


Marriage and civil partnership

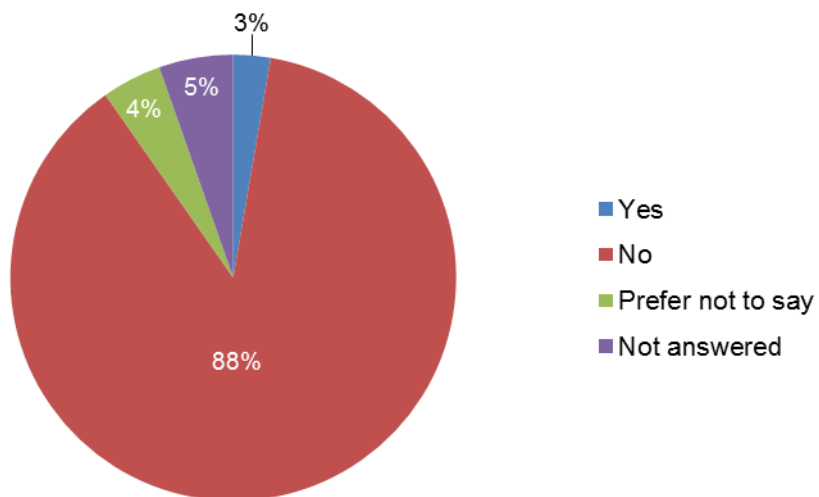


Pregnancy and maternity

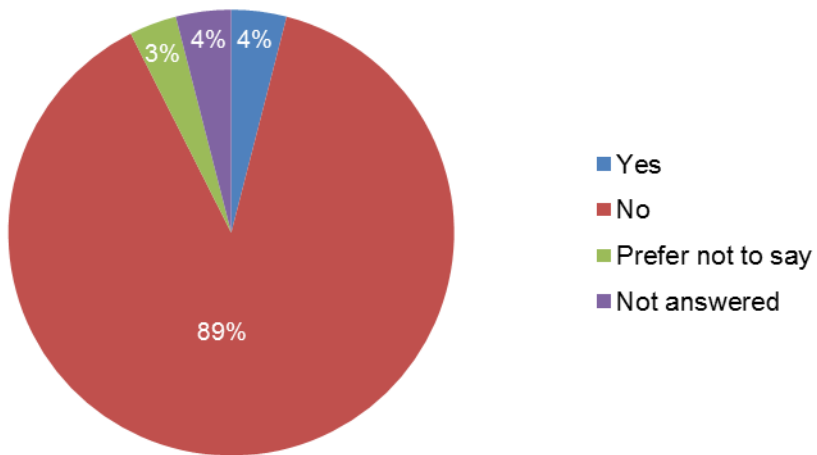
Do you have dependent children in your household?



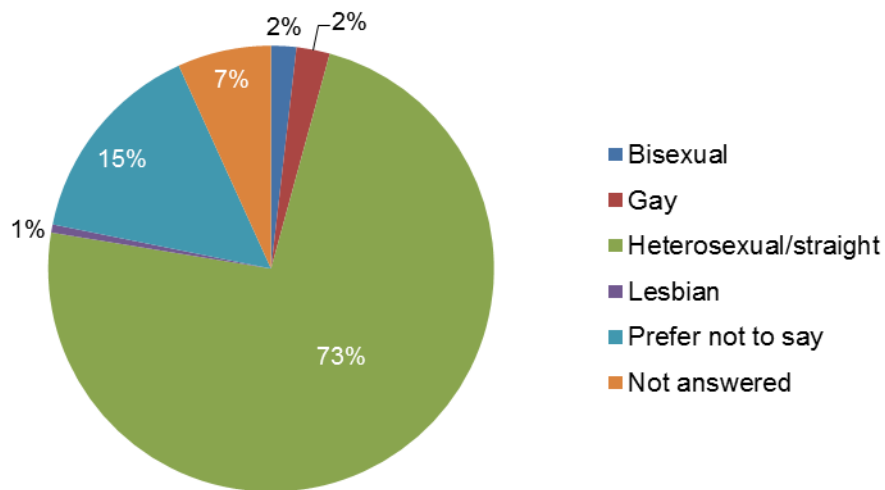
Are you pregnant?



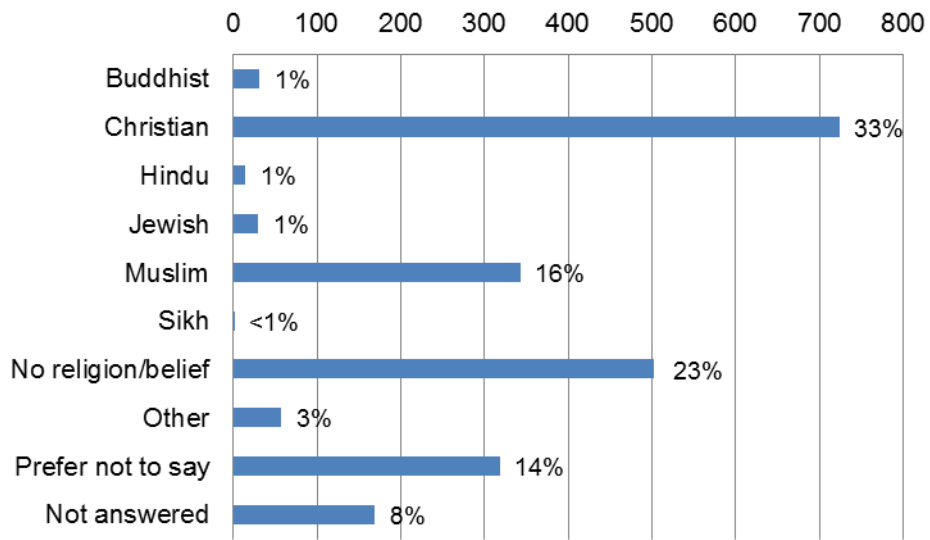
Have you give birth in the last 26 weeks?



Sexual orientation



Religion and belief



Appendix 2: Open question analysis

1. Introduction

Camden Council is reviewing its current allocation scheme. At present, there are 28,500 households on the housing register with 300 new applications each month. Despite this, 60% of applicants have never placed a bid. This mismatch between supply and demand is making the system costly and inefficient to run. Camden Council would like to re-evaluate the allocation scheme to ensure:

- it is fit for purpose,
- gives priority to those who would most benefit from rehousing,
- encourages mixed, strong and cohesive communities and
- is fair and accessible for applicants.

As part of the Council's wider financial challenge, savings of £500,000 will be made through the improved administration of the allocation scheme.

Consultation findings (covering the period January to April 2015) will inform Council policies on housing allocation premised on what respondents have expressed about their concerns, priorities and needs are in terms of social housing in Camden.

The findings have been clustered into four major themes: social cohesion and communities, help for children and young families, health and wellbeing and scheme transparency. Miscellaneous findings also fall under the following interrelated themes:

- Diverse housing needs not reflected in current proposals
- More accessible and straightforward housing application processes
- Crime and safety of social housing
- Concerns about fraud and application manipulation

These are not exhaustive themes but have been identified and analysed using qualitative coding of the most frequently mentioned issues by respondents. This report will provide evidence under each of these themes as well as miscellaneous concerns by respondents. Each section will be equipped with a chart of the ten most frequently mentioned concerns; sections will also provide quotation evidence of the modal responses per theme.

2. Engagement methods

In total, we have received ca. 2,000 responses from questionnaire participants. Coding analysis was carried out on 1,331 questionnaires where remaining questionnaires did not include any comments. They responded via the following outreach methods:

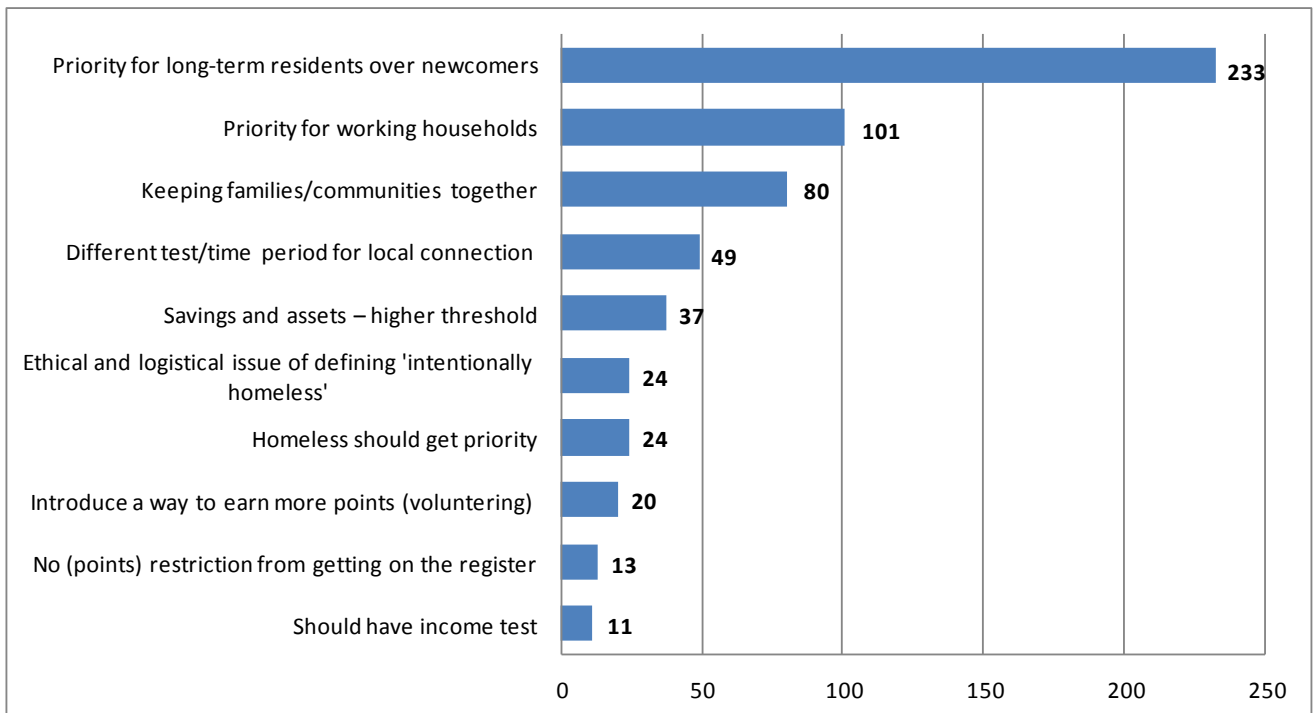
- Camden Council Community Researchers who conducted face-to-face questionnaire interviews around Camden wards. These took place in community gathering sites such as public libraries, colleges, and

- community centres.
- An online questionnaire equivalent accessible on <https://consultations.wearecamden.org> (now closed).

Public engagement has been effective in contacting a wide range of participants. Outreach was prioritised to engage hard to reach demographics in a variety of public spaces.

3. Social cohesion and communities

Table 1 Frequency of open question responses by theme (social cohesion and communities)



The vast majority of responses felt that, in order to ensure social cohesion, housing allocation should rely on a residence test. However, suggestions for residence length or its weighting varied:

More points should be given to residents who have spent over 20 years living in the borough!

I think it should be considered that people who have lived in Camden all their lives and their family have been Camden residents through generation after generation should be given priority to new housing

Long-term residents should have greater priority on the list, but 5 out of the last 7 years may be a bit much for younger applicants... 3 out of 5 to join is fairer

Any weighting for long-term residents should be quite small, and I speak as one who has lived in Camden for most of the last 15 years.

One major theme that was not accounted for within the survey that relates to social cohesion has been the priority for 'key workers' or those who make an active 'contribution' to Camden:

I think priorities should also be given to people who live and work in Camden and have important demanding jobs to society such as healthcare workers and teachers.

Key workers - nurses, teachers, members of the police and fire prevention services - should be given priority.

Those on the list should show they are volunteering or in work of some sort. They need to give something to the community/wider economy.

Respondents were also worried that future proposals would lead to more divisive communities. These ranged from responses that appealed to the cohesion of social structures:

To help sustain families so parents can support their children, their families' children can help look after their parents when they get elderly & infirm. The council need to consider children of families born & raised in the borough more favourably.

Prioritise residents living in Camden Council and Housing Association properties... as these are people who have been a part of Camden's community before it's rise to popularity.

Priority should be given to born UK Camden residents and those that have lived and worked in the borough and contributed.

However, respondents were ambivalent or concerned about the ethnic diversity in social housing areas:

They should mix all ethnic groups together to make more friendly. At the moment they are segregated and it has danger for the country as a whole...

The Borough should aim to avoid ghettos and achieve a mix of cultures, religions, income levels, age, employment status, race and gender, which represents the overall demographics of Greater London

Stop asking people about ethnicity, race, country they were born. Just ask about Camden residency.

The allocation seems to favours the Bangladesh and Somalians more than the other nationalities

Though there is general consensus that social housing should be means tested, respondents were highly sceptical about the proposed £20,000 savings/assets cap:

I do not think applicants with savings over £20K should be prevented from joining the register. £20K is nowhere near sufficient for a deposit to buy and could be eaten up in contributing towards high rent in private sector

£20,000 is not enough for a deposit and you will just make anyone working feel that council housing is only for the really poor.

About the £20,000 savings, you don't get mortgage if you are not getting paid more than £40,000 a year so this should be depend on your income not how much you save you need to underline this.

Finally, homelessness proved to be a highly emotive issue. Many respondents have experienced homelessness and many have expressed moral outrage towards the issue:

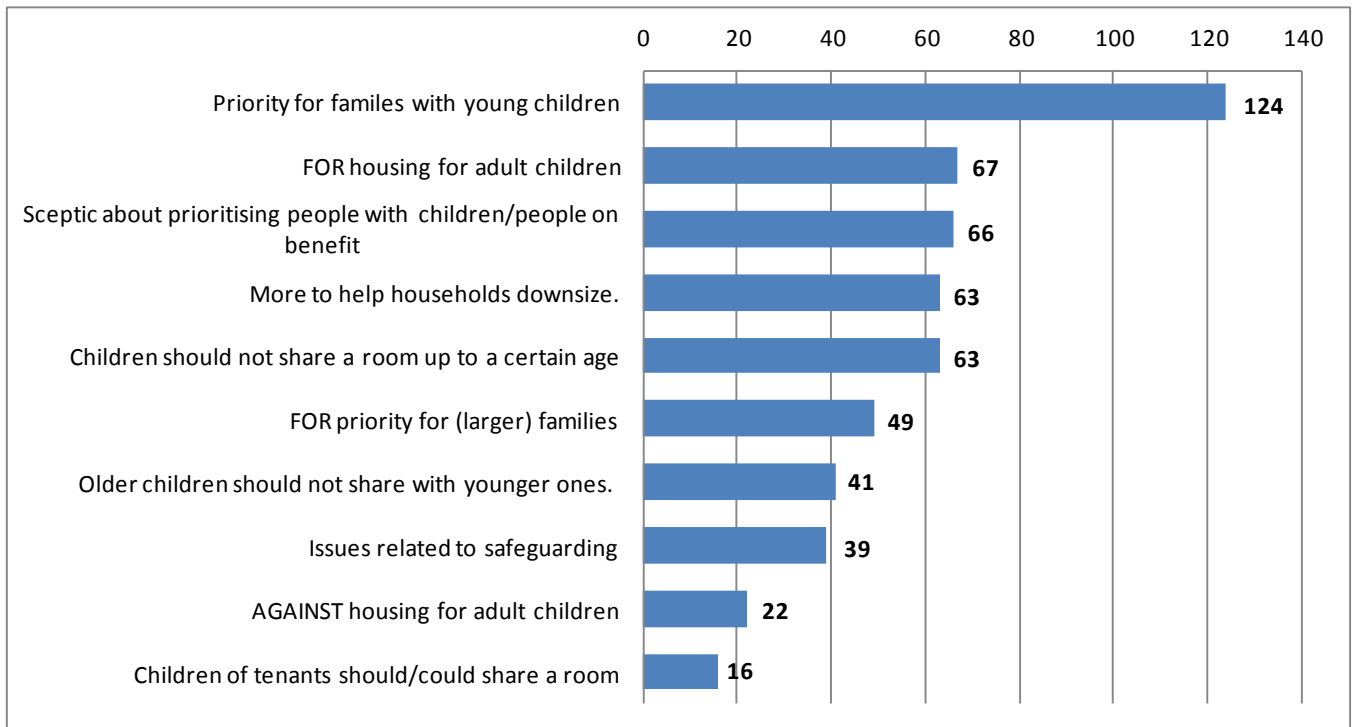
Homeless people should be priority not matter what has happened

I am homeless and have the right to be re-housed and not be on the street.

We need to look after people who have no money or money in their family, this is what council housing is for! I'm disgusted that you did not mention homeless people at all, do you know how hard it is for someone on the streets to get back on their feet?

4. Help for children and families

Table 2 Frequency of open question responses by theme (help for younger families)



Priority for young families is a highly divisive issue. Some respondents are sympathetic to families or single parents with young children:

Prioritise pregnant and or single mothers who are homeless to be housed asap, before they give birth.

I strongly believe that you should pay more attention of single parents with small children and no other relatives around to help or support them to move forward in their life's development

Overcrowding is a serious issue especially when there are children because children need space be it to work or play

However, many respondents also expressed scepticism and dismay towards prioritising families based purely on the existence of young children:

I fell Camden council need to re-evaluate their method of prioritising most people who seem to be a priority are purposely making their situations worse or not doing anything to change their situation

Up until now the council has in practice been promoting teenage pregnancy and single motherhood.

Anyone who decides to have children should have already looked at their financial and housing situation. Therefore I do not believe people who have lots of kids should get priority.

Nonetheless, respondents also considered the allocation of social housing to adult children to be a means of ensuring family and social cohesion:

I think that the current system of allowing adult children to stay at home with their parents should be maintained because of the state of the economy and house prices.

Put families with adult children living with them as a priority. Like myself there are navy families that have no choice but to live in conditions where they share a room with two or more adult siblings, which is ridiculous.

Adult children from overcrowded council accommodation, if they move out, cannot afford to stay in Camden.

Responses were similarly divided over the allocation of social housing for adult children of existing council tenants:

I don't think growing up in a council flat should automatically entitle adult children to get a council flat. There are people in much greater need.

Adult "children" are not children. They should not be living off their parents AND the state in council housing. They should be encouraged to work. With multiple salaries coming in, these people should not be in council housing, it is for the vulnerable and with the shortage, the vulnerable should come first.

In terms of overcrowding, respondents are impassioned about the overcrowded conditions that some families live in and feel priority should be given to larger families. This also relates to a general dissatisfaction that the council defines the living room as a bedroom:

Re-evaluate the criteria, open plan kitchen/living room cannot be deemed as a spare room. Maybe it is a misconception!

Encourage (possibly with larger incentives) those who could downsize freeing up larger family properties.

In relation to the issue of housing for adult children, respondents expressed outrage that children should continue sharing rooms up to a certain age (though this often depends on the sex of the children):

I feel it is more important for adult sons and daughters not to have to share a bedroom than it is for younger children. My children shared a room when young which was fine but as teenagers it is far more problematic. Again, this can break families up and force young adults out of the home as they will want to move out earlier.

It is not fair to expect children of different sexes to share a room, especially when going through puberty. Its tough enough on them as it is, but having to share with a brother who is also going through puberty is disgusting.

You cannot have adult siblings of the same sex sharing rooms regardless of age, there must be an age limit.

Finally, one important issue that the questionnaire overlooked has been the issue of safeguarding. Respondents confess to experience or knowledge of abuse, for example, that is not sufficiently addressed in social housing allocation:

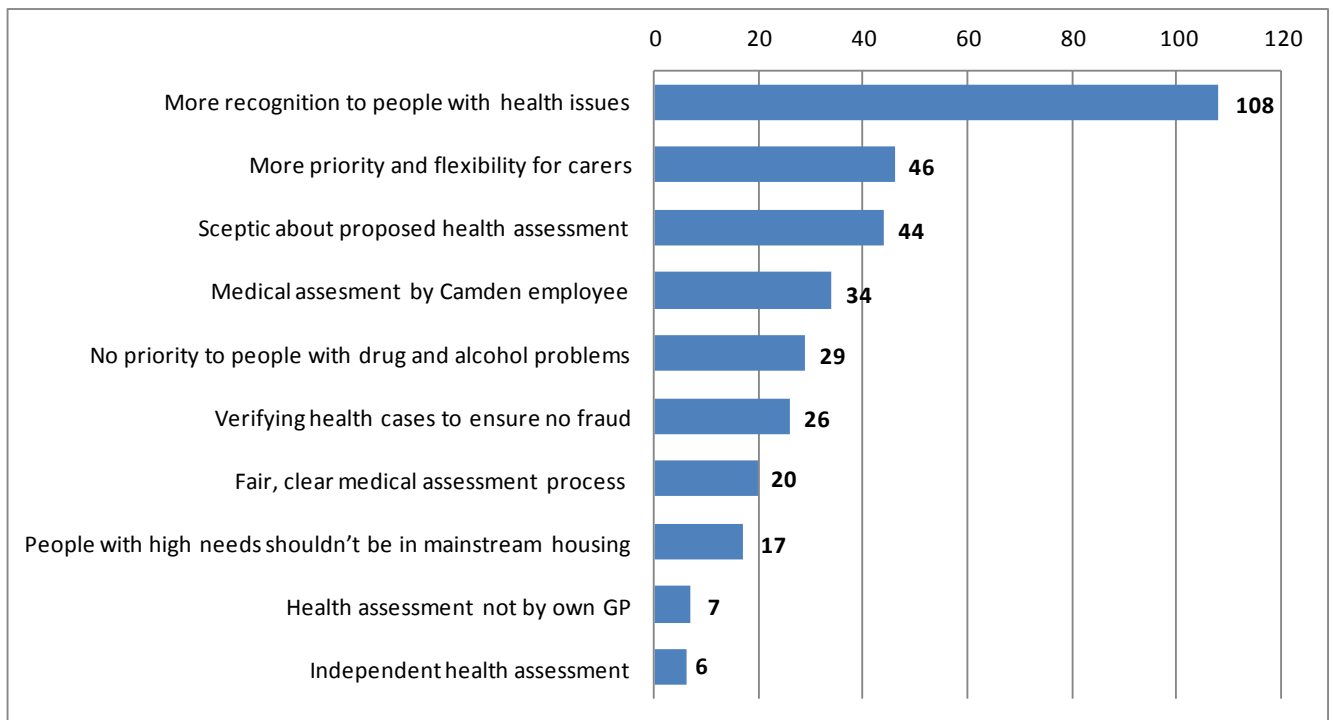
Would want to ensure people affected by domestic violence retain or have high priority in new system

Women and children, particularly domestic violence cases provide them with max info and give them better support. More protection for children in the same house with abuse and people with drinking problems.

Make women aware, incase they go through domestic violence, that there are women's shelters and safe houses through women's aid and that they don't have to live with domestic abuse.

5. Health and wellbeing

Table 3 Frequency of open question responses by theme (health and wellbeing)



The biggest concern of respondents was that health issues should be given more recognition. This includes the recognition of a diverse set of mental and physical health issues as well as the need for live-in carers who should be allowed on applications:

People with medical care should be given more recognition and adequate space for their carer and / or equipment to be stored, without having to pay extra.

Carers can be part-time or family members who sometimes live elsewhere... Some discretion could be made in certain circumstances where an extra bedroom is needed.

Health needs and psychological needs should be seriously noted and tenants who have such needs ought to be given some kind of priority.

I have a mental health condition, and require a suitable accommodation, which ultimately contributes to my health and wellbeing. I am a bit worried about the changes and wonder how I might be affected.

Some residents were sceptical about Camden's proposed changes to the health assessment process:

The way health points are awarded do not fully take into account a persons disability. Removing category C means people like myself, who's child has a severe illness but isn't recognised on you web form, will lose points and be stuck in this situation. That's unfair.

I don't think eligible people with 'lower level medical priorities' should be discriminated against or considered to be in lesser need than those with longer term care needs.

However, attached to the recognition of the diverse health needs is the need for independent and 'fair' assessment methods to ensure no fraud:

There's so much fraud going on in this country so I think we need an independent system for assessing medical need including looking at historical medical records to see severity of need.

Some people fake the application to get more points than others. Some are so called disabled but yet they drive a car and have high-end things when people in situations need housing more.

Health assessment must be robust. Too many cheats at the moment.

Related to this is the concern that those with severe criminal records or drug issues should not be given social housing:

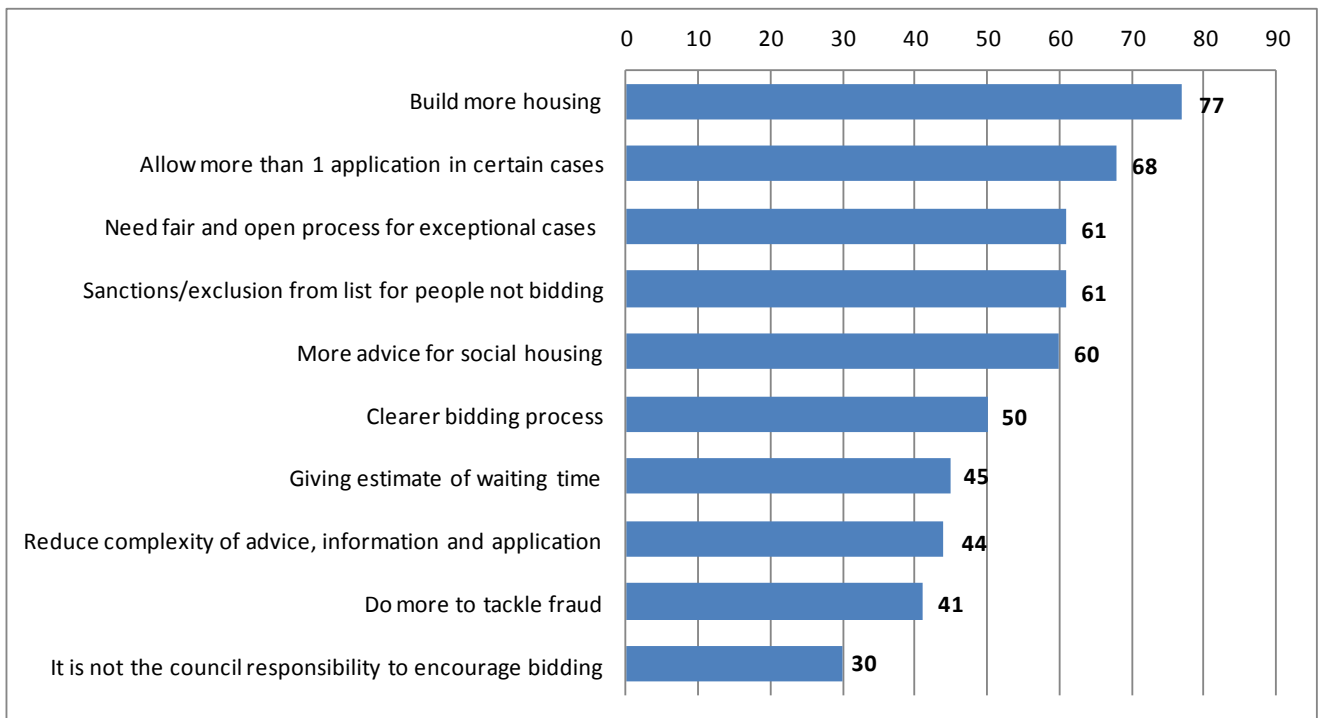
People who make themselves intentionally homeless because of antisocial or criminal behaviour should not be on the list.

Use your power to evict "quicker" those that cause antisocial behaviour, & go against the community ethos.

Exclude people with records of ASBO's or criminal records, particularly violence, theft, assault or alcohol related crime, fraud, racism, homophobia, religious intolerance or extremism.

6. Fairness and transparency

Table 4 Frequency of open question responses by theme (fairness and transparency)



Overwhelmingly, respondents push for the Council to increase the building and stock of social housing:

Build more homes. Build higher density housing to fit more people in.

There are too many people waiting for social housing. The council needs to build more homes.

The government should build more houses. There are many empty places and old building that can be rebuilt.

On the application limit, respondents suggest that multiple applications should be allowed in exceptional cases though not for everyone:

There should be some flexibility. If there's a 2nd application there must be a clear transparent reason for it. Maybe an alternative scenario for the family if there is a particular situation. They could be offered a 'plan b'.

There is always an exception and I didn't like the idea of one person senior officer deciding, also I think its OK to be on 2 application because I will only ever move to 1 property.

Its mind blowing that over 1000 people are on 2 or more applications for housing considering the demand and the lack of supply. 2 bites at the cherry is completely unfair and should have never been allowed. My God who is regulating this?

Perhaps one of the largest rebuttals of the new proposals has been related to the removal of the exceptions panel. Respondents showed overwhelming dislike to the removal of the panel and feel it is an important mechanism for individual consideration and appeal:

A web form is never going to fully meet everybody's requirements or ask all of the right questions or have the answers. The exceptions panel is definitely still necessary.

I think it's vital that you do not remove things like the Exceptions Panel... I think the more things that are decided by panel, the better.

I disagree that you should remove the exceptions panel although I also think that most housing situations should be in the scheme.

Many respondents suggest that there should be sanctions for a lack of bidding activity, although they also concur that bidding processes should be made clearer:

If people are not bidding they don't need housing so they should be removed from list

Get rid of those households that aren't bidding.

Bidding system is so complicated. It should be made easier and give help to people who can't or are unable to bid themselves.

Related to the last point, respondents express exasperation that the current application process is complicated, lack accessibility and that not enough advice is given:

Take language in consideration some people find it difficult to understand. Translation on website in Bengali might help. Paper application and desk application will help those who don't prefer online application.

To be honest the whole point system is the most complicated thing I have ever come across in my life and it is extremely stressful and requires having access to the internet and time to scroll through hundreds of properties on websites that are complicated.

Indicate bidding position to applicants before bid is placed.

Give more advice to people who are not sure or aware of the housing laws

Finally, respondents feel the Council should do more to tackle incidences of fraud:

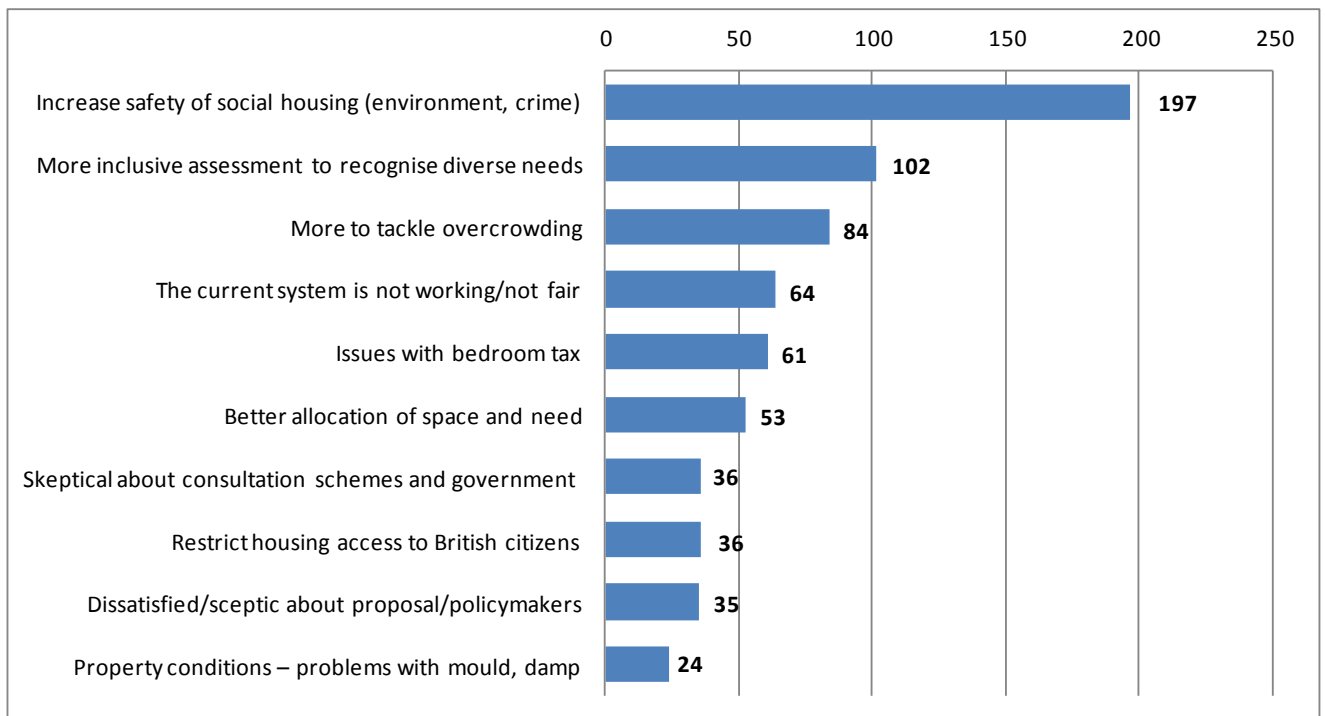
Remove all illegal tenants sublets and fraudulent purchases and you would have twice as many properties to let.

If someone has a council flat it should not be a flat for life but one until they can afford market rents. Checks should also be done for subletting and other types of fraud

To prevent fraud in Islington every new prospective tenant is photographed. The system has been going for few years and is working well.

7. Miscellaneous

Table 5 Frequency of open question responses by theme (miscellaneous)



The following themes have been identified as part of the qualitative analysis outside of the initial themes of the consultation.

Overwhelmingly, respondents feel as those current and proposed social housing policy is not sufficient in accounting for the diverse needs of Camden residents. These may be related to specific health-related needs but also needs of the elderly (e.g. mobility issues).

Older people with mobility issues should be properly accommodated. Not given a flat on the third floor with no lifts. I am a carer and have seen all these in my work.

If tenants are living on higher floors without lifts and have stroke or heart attack should be given high priority for fast move down to ground floor.

Although people with support needs have a lot of priority to housing (mental health issues or etc.), there should be a mandatory rehabilitation scheme organised. Or every 6 months high-risk people should be monitored severely.

Each circumstance should be considered properly. There needs to be some sort of emergency accommodation.

Households are complex and setting up rules to cover everything will probably lead to some people in unusual circumstances being treated unjustly.

Additional views not accounted for in the questionnaire include some residents' views that social housing be reserved for tax-paying British citizens and more cynical views of social benefit claimants:

British citizens should always take priority over recent immigrants; many of whom should be excluded entirely from council services

Social housing should only be for British citizens or those who have been in UK and contributed by way of tax and national insurance over a 10 year period.

British citizens who have lived in the borough for a long time should get priority over people coming in from overseas without a connection to the borough.

I feel Camden council need to re-evaluate their method of prioritising most people who seem to be a priority are purposely making their situations worse or not doing anything to change their situation e.g. Not getting a job because housing benefits will be paid.

Respondents cite bedroom tax as a persistent concern but also suggest that space be better allocated to those in need (e.g. space for children to play, downsizing opportunities):

Instead of charging bedroom tax, which the council is also paying for many, why not just simply move them to a smaller accommodation.

Overcrowding is a serious issue especially when there are children because children need space be it to work or play.

An elderly, single tenant in a four bedroom property with a garden may be more willing to move to a more manageable property if advised of the availability of 1 bedroom, ground floor properties with small gardens.

On a more operational note, a significant number of respondents have expressed dissatisfaction with the Council's customer service and the lack of a feedback system:

There doesn't seem to be a clear reporting system. I was going to go public with my case against a rude council officer.

Housing staff officers are really bad. I was treated horribly by one of them and am not sure if they got the right training.

Lastly, two of the largest concerns of respondents were about the conditions of social housing properties. These included concerns about the physical condition of the property (e.g. mould, damp) as well as social factors (e.g. antisocial behaviour, drug issues, crime):

If they have damp or condensation either sort it out or move them.

Most people end up with health issues due to overcrowded and damp in most property as well as other outstanding repairs.

Council needs to do more to crack down on anti social behaviour caused by tenants this can cause distress to others and estate officers seen to do little.

APPENDIX I: GENERAL OPINIONS

Feedback on the consultation was generally positive, however many saw flaws in the research method and proposed changes. Criticisms were often targeted at Council definition of terms:

I welcome this consultation, but the focus on savings/assets is wrong... I love Camden Borough and I don't want to leave. I have savings and a decent income, but I simply cannot afford to buy a two-bedroom place in Camden, the prices are ridiculous.

There is not enough information in the questionnaire to make a fair choice.

What you perceive as serious health grounds are too vague

Something that always seems to be overlooked when talking about Camden tenants is the definition of 'connection to the borough' gaining extra points because you live in

Moreover, respondents have expressed dismay about the accessibility of the consultation for the less able to use technology or less likely to be mobile, despite the employment of community researchers to overcome these issues:

It's all online - consider the older generation. More clear to whom to contact and more info.

Information needs to be made widely available for Camden Residents when consultations occur or changes take place that directly affect them. This is the first time I have been e-mailed a consultation survey regarding the housing register.

I have been on your waiting list for a long time and haven't got any results. Due to my lack of understanding and my disability as a dyslexic person. As reading and writing is not my strongest point!!

Some respondents are more cynical about the consultation process, the Council's sale of property and the local authority in general:

The proposals (and this consultation) are a poor response to the on-going crisis in affordable social housing.

This consultation will not convince anyone if it is just a way of playing around with numbers.

I am not even bothered to join the housing register. Nothing will really happen. I lived in Camden for 40 years. I can tell when the government is just lying. I am fed up with the council survey.

Respondents were nonetheless vocal on how we may improve the consultation and policy-making process:

Increase the number of senior consultations officers and ensure they are well trained, be open minded to make sure all situations are covered, e.g. abuse.

Most changes need a trial period first. Clear way of evaluation specific length of trial period for changes.

Questions are complicated, it's difficult to know what to pick even though she explained make more simple survey next time.

APPENDIX II: RESEARCH LIMITATIONS

Feedback is limited by several research factors:

1) Sampling method. The online consultation by itself would not have provided a representative sample of Camden's population. Therefore, Community Researchers have been employed to improve the overall representation. The researchers were assigned quotas representative of Camden's populations in terms of gender, ethnicity, age and ward to ensure engagement with hard to reach groups in Camden. They have been successful in improving the overall sample significantly.

2) Data skewness. The data skew of the sample used for this qualitative analysis is also due to the exclusion of participants who have not left a comment. As such 61.7% were female and 33.9% were male (4.4% prefer not to say). Similar problems arose in the ethnic demographics of responses; response rates did not correlate with Camden's overall ethnic makeup:

Table 6 Ethnic composition of respondents

Ethnicity	2011 Census Data	Questionnaire response	Difference
White	66.29%	50.8%	-15.49%
Asian/ Asian British	16.09%	8.2%	-7.89%
Black/ Black British	8.20%	15.4%	+7.2%
Mixed	5.59%	4.5%	-1.09%
Other	3.84%	3.8%	-0.04%

3) Feedback is limited by respondents' understanding of the proposed changes in the way the Council allocates social housing. In a 2009 survey, 54% respondents answered 'partly' and 23 'not at all' to the question 'How well do you understand how council and housing association homes are allocated in Camden?' Although questionnaires and Community Researchers have explained to participants the proposed changes, many felt too little information was provided for them to make an informed response.

This was true of Section 2, Question 2, for example, which asked whether the Council should 'Change how we assess families with adult sons and daughters living

at home?' The lack of specificity and sufficient information in actual question meant that respondents potentially misconstrued the question. This potentially increased the margin of error in data collection.