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Communities and Local Government
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Eland House
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London SW1E 5DU



Circle Anglia
1-3 Highbury Station Rd
London, N1 1SE

22 October 2009

Dear Ms Walker

Re: Fair and Flexible, draft statutory guidance on social housing allocations for local authorities in England

Thank you for giving us the opportunity to comment on this consultation.

Our responses to the specific questions in the consultation document are outlined below:

Q1. Do you agree with the objectives and outcomes which local authorities should seek to achieve through their allocation policies?

Yes we agree with the objectives and outcomes outlined.

Q2. What can local authorities do to raise awareness and understanding of social housing allocation among local communities?

As the Mori data shows most people (45%) do not understand how social housing is allocated which suggests that they do not really need to as it does not affect them.

However, we believe that Local Authorities have a duty to ensure that policies and procedures are open and transparent and fair at all times.

Normal communication channels such as Local Authority websites, newsletters and open communications should be used. Housing Associations have frequent contact with tenants and would be able to work with the Local Authority to promote and consult with residents as appropriate.

Q3. How can local authorities engage most effectively with local communities in order to shape local allocation policies?

Normal communication channels such as Local Authority websites, focus groups, citizens panels, newsletters and open communications should be used. Housing Associations have frequent contact with tenants and would be able to work with the Local Authority to promote and consult with residents as appropriate.

Q4. What is the best way for local authorities to provide information and facts about how the allocation process is working in their area?

Again normal communication channels but in addition local Advice and Guidance services such as the Citizens Advice Bureau, libraries could also be used.

Q5. Does the draft guidance provide sufficient clarity on the extent of flexibilities available to local authorities when formulating allocation policies?

In the main yes, however, we'd like to suggest some further issues for consideration. Generally, we appreciate that this is statutory guidance but we would like to see more 'good practice' highlighted and greater encouragement for Local Authorities to adopt some of these ideas.

Circle Anglia would like to note a concern around the 'local connection' point (point 63). We believe that this could be potentially detrimental to resident mobility.

In addition, point 70 refers to job mobility which may be supported through greater regional flexibility. As a national housing provider, we believe that more encouragement needs to be given in the guidance to further encourage mobility between Local Authority areas and housing associations. We are concerned that some Local Authorities may use point 63 to further "exclude" applicants from outside their district. Our view is that we would to encourage mobility, particularly where the need is based on economic, health or social reasons.

We believe that in addition in terms of resident mobility across Local Authorities boundaries it is important to consider in the recommendation for common allocations policies, as this will need to be balanced with what the Local Authorities is hoping to achieve for their own residents.

Circle Anglia runs a website www.houseexchangedirect.org. So far we have over 93 landlords signed up covering 750,000 households. We estimate that this is helping around 1,200 tenants a month to move. We believe that this signifies the demands by social housing tenants to access greater mobility.

We believe that there should be a requirement for Local Authorities to carry out and disclose full 'risk assessments' on nominated prospective housing association tenants to ensure appropriate allocations and support packages are in place where necessary

In addition we feel that there should be a greater requirement for Local Authorities to allow equal access for housing association tenants to local housing registers and housing options and advice services

Our experience is that housing association tenants do not have equal access to Local Authority funds available to tackle under occupation and overcrowding in the area. Our appeal is that more emphasis is made for allocations policy to look at better use of existing stock, particularly in the current economic climate.

For example in Circle 33 we have set up our own Housing Advice and Options Service which looks at a variety of ways to combat overcrowding in ways you describe (partition walls, conversions, storage equipment). We believe that increased funds should be allocated to these schemes as the cost of building new homes is significantly more than some smaller measures to tackle overcrowding. With the availability of social housing grant to fund additional bedspaces and larger homes through extensions and de-conversions, the life chances of social housing tenants would be greater improved.

Finally we believe that there needs to be greater promotion of good practice in Local Authorities in terms raising awareness of routes into housing.

Q6. How effective, currently, is cooperation between RSLs and local authorities over the allocation of social housing? What further measures could help?

Any measures which ensure greater flexibility to develop policies which reflect local circumstances, greater simplicity and transparency and partnerships with housing associations are welcome.

Our experience in the main is that most Local Authorities have good relationships with housing associations and are good at consulting about their proposals (e.g. for CBL schemes). They are also generally open to local lettings policies but that the monitoring of these and their effectiveness

does not occur consistently across the different local authorities. We have information sharing protocols with the majority of Local Authorities we work with.

We believe that the guidance could go further and insist that there is a requirement for Local Authorities to work with housing associations in developing local lettings policies (relating to existing stock as well as new developments) which support the development of sustainable communities. For example this could include a requirement on new tenants to sign up to local employment advice and guidance services where relevant and available. We are trialling this in Hackney and Camden and would be willing to share experiences with the department.

Q7. How have you involved your local community in putting together your response to this consultation document?

N/A (Local Authority question)

Q8. Do you intend to revise your allocation scheme in light of the new statutory guidance?

N/A (Local Authority question)

Q9. If so, what changes will you be considering, and how might you engage local people and organisations in this process?

N/A (Local Authority question)

Q10. Do you agree with the estimate in the impact assessment on the one-off familiarisation cost associated with this policy?

N/A (Local Authority question)

Q11. Is there any further evidence or analysis relating to the initial assessment in the impact assessment of the wider costs and benefits of this new guidance which we should consider for the final impact assessment?

N/A (Local Authority question)

Q12. Is there any further evidence or analysis relating to the initial assessment in the impact assessment of the impact on race, disability and gender equality which we should consider for the final impact assessment?

It may not be completely relevant but we would like to make a point regarding the inequity of Disabled Facilities Grant. Our experience as a housing association is that despite the fact that Local Authorities have an obligation to provide this funding, they often expect us to fund these grants or tenants to apply directly which means that the most vulnerable would wait for months for adaptations.

Q13. Is there any further evidence or analysis we should consider for the full equalities impact assessment which we will be undertaking in light of this consultation in the autumn?

No comment

Q14. What impacts, costs and benefits do you think might be associated with any changes to your policy which you will be considering in the light of this guidance?

N/A (Local Authority question)

Please do not hesitate to contact me if we can be of any further assistance.

Yours sincerely

Clare Brine
Head of Public Affairs