



# City of Doncaster Council

## Agenda

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To all Members of the

# CABINET

**Notice is given that a Meeting of the Cabinet is to be held as follows:**

**Venue:** Council Chamber, Civic Office, Waterdale, Doncaster DN1 3BU

**Date:** Wednesday, 16th August, 2023

**Time:** 10.00 am

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### **BROADCASTING NOTICE**

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**Damian Allen  
Chief Executive**

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Issued on: Tuesday, 8 August 2023

**Governance Services Officer for this meeting:**

Amber Torrington  
Tel: 01302 737462

City of Doncaster Council

[www.doncaster.gov.uk](http://www.doncaster.gov.uk)

## Item

1. Apologies for Absence
2. To consider the extent, if any, to which the public and press are to be excluded from the meeting
3. Public Questions and Statements

**(A period not exceeding 20 minutes for questions and statements from members of the public and Elected Members to the Mayor of Doncaster, Ros Jones. Questions/Statements should relate specifically to an item of business on the agenda and be limited to a maximum of 100 words. As stated within Executive Procedure Rule 3.3 each person will be allowed to submit one question/statement per meeting. A question may only be asked if notice has been given by delivering it in writing or by e-mail to the Governance Team no later than 5.00 p.m. on 11th August, 2023. Each question or statement must give the name and address of the person submitting it. Questions/Statements should be sent to the Governance Team, Floor 2, Civic Office, Waterdale, Doncaster, DN1 3BU, or by email to [Democratic.Services@doncaster.gov.uk](mailto:Democratic.Services@doncaster.gov.uk))**

4. Declarations of Interest, if any.
5. Decision Record Forms from the meeting held on 19th July 2023 for noting (previously circulated).

### **A. Reports where the public and press may not be excluded**

#### **Key Decisions**

- |    |   |           |
|----|---|-----------|
| 6. | City of Doncaster Council Gypsy and Traveller Pitch Allocation Policy Review. | 1 - 56    |
| 7. | City of Doncaster Council Local Lettings Policies Review.                     | 57 - 90   |
| 8. | Accessible Housing Register - Review of Policy.                               | 91 - 130  |
| 9. | St Leger Homes Doncaster Management Agreement Review 2023.                    | 131 - 166 |

## **Cabinet Members**

### **Cabinet Responsibility For:**

**Chair – Ros Jones, Mayor of  
Doncaster**

Budget and Policy Framework

**Vice-Chair – Deputy Mayor  
Councillor Glyn Jones**

Housing and Business

Councillor Lani-Mae Ball

Portfolio Holder for Early Help, Education, Skills  
and Young People

Councillor Nigel Ball

Portfolio Holder for Public Health, Communities,  
Leisure and Culture

Councillor Joe Blackham

Portfolio Holder for Highways, Infrastructure and  
Enforcement

Councillor Rachael Blake

Portfolio Holder for Children's Social Care and  
Equalities

Councillor Phil Cole

Portfolio Holder for Finance, Traded Services and  
Planning

Councillor Mark Houlbrook

Portfolio Holder for Sustainability and Waste

Councillor Jane Nightingale

Portfolio Holder for Corporate Resources

Councillor Sarah Smith

Portfolio Holder for Adult Social Care

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## City of Doncaster Council

### Report

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**Date: 16 August 2023**

**To: To the Mayor and Members of Cabinet**

**Report Title: City of Doncaster Council Gypsy and Traveller Pitch Allocation Policy Review**

<b>Relevant Cabinet Member(s)</b>	<b>Wards Affected</b>	<b>Key Decision?</b>
<b>Cllr Glyn Jones</b>	<b>All</b>	<b>Yes</b>

### **EXECUTIVE SUMMARY**

1. This report sets out recommendations for ten proposed changes to City of Doncaster Council's Pitch Allocations Policy for Gypsy and Traveller sites.
  - 1.1. This refers to four council owned sites across Doncaster at the following locations with a total of 65 pitches.
    - White Towers, Armthorpe (although in Intake/Clay Lane ward)
    - Little Lane, Long Sandall
    - Land's End, Thorne
    - Nursery Lane Sprotbrough
  - 1.2. A key part of the review process has been to devise and undertake a consultation process which effectively engaged with residents, direct contact with active waiting list applicants, key stakeholders and elected members using a range of media and support to inform discussion. As referred to in 5.2., advice and support was sought from nationally recognised organisations.
  - 1.3. Members from four wards were consulted on the proposed changes and had the opportunity to feedback on any additional changes. Engagement with site residents has been successful, with 95% (38) seen in person and 100% (28) of the waiting list contacted with a 54% (15) response rate. The consultation is summarised in section 15 and in full in **Appendix C**.

- 1.4. The overall objectives of the Pitch Allocations Policy are to:
  - Have a robust process in place
  - Promote understanding and ownership amongst residents
  - Support sustainable communities
  - Have regard to cultural differences
  - Make the best use of available pitches
  - Fulfil the Council's legal obligations
  
- 1.5. Headline outcomes of the consultation were
  - All eight proposals were fully supported by all responding consultees
  - Two additional proposals have been included following the consultation process

## **EXEMPT REPORT**

2. No

## **RECOMMENDATIONS**

3. That Cabinet consider the outcomes of the review and consultation.
  
- 3.1. That Cabinet consider the recommendations on policy changes consulted on, full details of which are in **Appendix A**.
  
- 3.2. That Cabinet formally adopt the amended policy in **Appendix D**.

## **WHAT DOES THIS MEAN FOR THE CITIZENS OF DONCASTER?**

4. This policy sets out the revised framework for vacant pitch allocations on council owned Gypsy and Traveller sites in Doncaster.
  
- 4.1. This review aims to ensure that this policy is fit for purpose and makes the best use of available pitches.

## BACKGROUND

5. The management of Gypsy and Traveller sites transferred over to SLHD management in 2014 with the transfer of the Housing Options and Homelessness service and management of council owned residential caravan sites.
  - 5.1. The policy mirrors the banding system of the City of Doncaster Council's Housing Allocations Policy with 4 bands with Platinum being the highest need, Gold, Silver and Bronze being the lowest need. The policy is outdated and awareness from site residents and those on the waiting list is low.
  - 5.2. Advice and support was sought from the National Gypsy and Traveller advisory panel with associated Good Practice guides. National Charity, Friends, Families and Travellers. The Oak Project, a 3-year partnership with Gypsies & Travellers, National Policy Advisory Panel on Gypsy and Traveller Housing and the Housing Diversity Network.

## OPTIONS CONSIDERED





6. Options considered have been informed through legislative requirements, research, consultation and input from the project group key officers, including the City of Doncaster Council's Legal services. None of the changes were particularly contentious and this is reflective on the support from consultees.
  - 6.1. On review of Good Practice and policies in other authorities, consideration was given to changing the current structure of the policy, including implementing a points-based system vs the current banding and date order approach. After seeking advice from the National Gypsy and Traveller Advisory Panel and reviewing related publications of good practice, the decision was to retain the current banding structure as it is considered good practice to have parity between this policy and the council's Housing Allocations Policy to promote consistency in approach. This is especially important to promote understanding, as residents and applicants may be on both registers.
  - 6.2. Each of the eight changes are outlined in **Appendix A** including:
    - The proposed change
    - The reason for change
    - The consultation outcome
    - The recommendation
  - 6.3. There are also an additional two recommended changes following the consultation process for consideration and comment.

## REASONS FOR RECCOMENDED OPTIONS





7. To ensure the policy is fit of purpose
  - 7.1. The majority of changes are not contentious and were unanimously supported by site residents.

## IMPACT ON THE COUNCIL’S KEY OUTCOMES

8.

Great 8 Priority	Positive Overall	Mix of Positive & Negative	Trade-offs to consider – Negative overall	Neutral or No implications
 <b>Tackling Climate Change</b>				✓
 <b>Developing the skills to thrive in life and in work</b>				✓
 <b>Making Doncaster the best place to do business and create good jobs</b>				✓
 <b>Building opportunities for healthier, happier and longer lives for all</b>	✓			
<ul style="list-style-type: none"> <li>Providing suitable access to pitches to those most in need will significantly improve living circumstances and access to health, education and support services</li> <li>Supporting people in accessing settled housing to meet their needs</li> </ul>				



<ul style="list-style-type: none"> <li>• Ensuring people are prioritised who live in unsuitable or unsustainable circumstances</li> <li>• Prioritising carers or those needing care in the policy</li> </ul>				
 <b>Creating safer, stronger, greener and cleaner communities where everyone belongs</b>	<input checked="" type="checkbox"/>			
<ul style="list-style-type: none"> <li>• Allocating pitches fairly and consistently in accordance with legal frameworks</li> <li>• Working with partners to ensure that allocations are appropriate and sustainable</li> </ul>				
 <b>Nurturing a child and family-friendly borough</b>	<input checked="" type="checkbox"/>			
<ul style="list-style-type: none"> <li>• Prioritising families in need for settled accommodation</li> <li>• Prioritising those with lack of settled accommodation to enable them to access services including health and education</li> </ul>				
 <b>Building Transport and digital connections fit for the future</b>				<input checked="" type="checkbox"/>
 <b>Promoting the borough and its cultural, sporting, and heritage opportunities</b>				<input checked="" type="checkbox"/>
<b>Fair &amp; Inclusive</b>	<input checked="" type="checkbox"/>			
<ul style="list-style-type: none"> <li>• Operating a legally compliant policy</li> <li>• Promoting understanding and ownership amongst residents and those on the waiting list</li> <li>• Including fair and proportionate checks to support cultural harmony</li> </ul>				

## Legal Implications [Officer Initials: NC | Date: 11/05/23]

9. Gypsy and Traveller sites are primarily regulated by the Mobile Homes Act 1983, following amendments made to that Act by the Housing and Regeneration Act 2008. A “Gypsy” is defined by section 24 of the Caravan Sites and Control of Development Act 1960 as “person of nomadic habit of life, whatever their race or origin...”
- 9.1. In terms of the allocation of plots on sites, the Housing Act 2004 (sections 225 and 226) previously imposed a specific duty on local authorities to carry out an assessment of the accommodation need of gypsies and travellers, as part of the periodic review of housing conditions and need within their area, under section 8 of the Housing Act 1985. With effect from the 12<sup>th</sup> July 2016, the Housing and Planning Act 2016 repealed those sections of the 2004 Act and made amendments to section 8 of the Housing Act 1985. This replaced the previous duty with a general duty to consider the housing needs of all persons, including those residing in or resorting to their area with respect to the provision of caravan sites.
- 9.2. A Caravan is defined by section 29 of the Caravan Sites and Control of Development Act 1960 as “any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed ,or being transported on a motor vehicle or trailer) and any motor vehicle so designed or adapted...” and so would include the mobile homes sited on the Council’s sites.
- 9.3. In assessing the needs of applicants and considering the allocation of plots on gypsy and traveller sites, the Council also has to comply with its duties under the Equality Act 2010, in particular the public sector equality duty under section 149 which obliges public authorities, when exercising their functions, to have ‘due regard’ to the need to:
  - a) Eliminate discrimination, harassment and victimisation and other conduct which the Act prohibits;
  - b) Advance equality of opportunity between people who share relevant protected characteristics and those who do not; and
  - c) Foster good relations between people who share relevant protected characteristics and those who do not.
- 9.4. Protected characteristics are age, disability, gender reassignment, race, sex, sexual orientation, religion or belief, and pregnancy and maternity. Only the first aim of the Public Sector Equality Duty set out in paragraph (a) above applied to a further protected characteristic of marriage and civil partnership.
- 9.5. Having due regard to advancing equality involves:
  - Removing or minimising disadvantages suffered by people due to their protected characteristic;

- Taking steps to meet the needs of people from protected groups where they are different to the needs of other people; and
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low
- 9.6. Romany Gypsies and Irish and Scottish travellers have been declared by the Courts to be protected as “races” under the Act.
- 9.7. Since the adoption of the current allocations policy, the Courts in R (VC) v North Somerset Council (EHRC intervening) 2015 have found that local connection requirements can be indirectly discriminatory as they are likely to have an adverse effect on disproportionately more Gypsies and Travellers than members of the settled population.

**Financial Implications [Officer Initials: JC | Date: 15/05/2023]**

10. The income budget for Gypsy and Traveller sites is set annually based on pitch occupancy information available at the time of the Council’s budget setting and fees and charges process.
- 10.1. There are no direct financial implications as a result of this policy change, any resulting occupancy changes will be reflected in the annual budget setting process.
- 10.2. The income budget for 2023/24 for these sites is shown below:

Budget 2023/24	£
White Towers	50,014
Little Lane	36,436
Lands’ End	117,572
Nursery Lane	2,917
Total	206,939

**Human Resources Implications [Officer Initials: AA | Date: 15/05/2023]**

11. There are no direct HR Implications in relation to this report.

**Technology Implications [Officer Initials: PW | Date: 12/05/2023]**

12. There are no direct technology implications in relation to this report. The author has confirmed that the current waiting list is held on a spreadsheet and it would be a future development to hold it on Open Housing, where required and cost effective.

## **RISKS AND ASSUMPTIONS**

13. There is potential for legal challenge against any aspect of the policy by an individual or organisation. In terms of the recommendations made the extent and robustness of the consultation is mitigation but no guarantee that a challenge will not be made.
- 13.1. Legal services have provided advice and guidance through the review as further mitigation against a successful challenge.

## **CONSULTATION PROCESS**

14. The review process began in February 2023 when suggested changes and the scope of the review were discussed with the Housing Portfolio Holder, and focus groups held with eleven elected members representing the relevant wards. These were informed by best practice, feedback from staff, stakeholders, customers and corporate priorities.
- 14.1. A presentation was given to members and stakeholders and newsletter given to tenants and applicants with the focus on face to face and direct contact. Regeneration and Housing Overview and Scrutiny Panel will also consider the way the consultation has been carried out as well as consideration of the final report before it progresses to Cabinet.
- 14.2. Stakeholders included Doncaster Council Enforcement Team, Public Health, and Education services, NHS Health Services, South Yorkshire Police and SLHD Housing Management.
- 14.3. Public consultation began on Monday 20<sup>th</sup> February 2023 for a period of 12 weeks with a focus on face-to-face consultation, multiple site visits and personal contact with waiting list applicants to remove barriers relating to literacy.

## **CONSULTATION OUTCOMES**

15. There were fifty-three responses from tenants and waiting list applicants, with comments from Stakeholders being noted. Additional comments made are listed in **Appendix C**.
- 15.1. All of the eight proposals consulted on were all fully supported with an additional two changes arising from consultation responses.
- 15.2. These were the consultation of residents prior to a new pitch being allocated to ensure Community Cohesion, where discretion is already allowed in the policy. This was understood by residents to need to be fair and proportionate and not disclose details of applicant's circumstances and explicit within the application process.

15.3. Applying a 6-month waiting list penalty (not able to join or have an application suspended for 6 months) to people pulling onto sites without landlord permission who are not considered for a pitch, to deter people from doing this.

15.4. Other themes from discussion with residents are listed below. Some of which were related to the Capital Investment planned for 3 of the sites. This was feedback to SLHD Asset Management to provide information to enable clear feedback to residents through Housing Management.

15.5. Themes from the Consultation

Theme	Mentions
Pitch sizes / Number of trailers should account for age and sex of children.	8
Tenants should be consulted before new allocations made to avoid community tension.	7
People already on site should be sorted first.	4
No transit site in Doncaster for visiting families.	3
Caring responsibilities on site.	2
Site improvement works.	2
Unauthorised residents shouldn't be allowed on waiting list.	1
Relatives waiting for pitch allocation.	1
Make new tenants pay a bond.	1

**DUE REGARD STATEMENT**

16. A Due Regard Statement has been completed and is in **Appendix B**. Disclosure of some protected characteristics is low from the community.

16.1. There are ten potential positive impacts on protected groups in the ten recommended changes, particularly around impact on homeless households, which supports making best use of available pitches to meet those most in need of the policy.

16.2. Any unforeseen adverse impacts will be identified through monitoring processes and statistical/data analyses.

**APPENDICES**

- A** Table of changes and recommendations
- B** Due Regard Statement
- C** Consultation Outcomes
- D** Amended policy

## **BACKGROUND PAPERS**

- None

## **GLOSSARY OF ACRONYMS AND ABBREVIATIONS**

- SLHD St Leger Homes of Doncaster
- EMT Executive Management Team

## **REPORT AUTHOR & CONTRIBUTORS**

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**Proposed Changes to Doncaster Council's Pitch Allocations Policy – Gypsy and Traveller Sites and Recommendations**

No	Change	Why?	Consultation Outcome	Recommendation
Change 1	<p><b>Be clear on who is not eligible to be join the waiting list for legal reasons. E.g.</b></p> <ul style="list-style-type: none"> <li>• Those under 18</li> <li>• Those subject to immigration control who are not eligible for housing assistance</li> </ul>	<p>Be explicit in the policy.</p> <p>Be clear on legal requirements.</p> <p>Promote understanding.</p>	<p>100% agreement by tenants and waiting list applicants.</p>	<p>Accept change 1</p>
Change 2	<p><b>Be clear on who does not qualify to join the waiting list.</b></p> <p>Can include persons:</p> <ul style="list-style-type: none"> <li>• Involved in anti-social behaviour who have caused, or are likely to cause, serious nuisance to neighbours</li> <li>• Who have deliberately worsened their circumstances to obtain additional priority</li> <li>• With rent arrears</li> <li>• Who have provided false information or deliberately withheld information</li> <li>• Who are occupying a current site without permission (dependent on the circumstances)</li> </ul>	<p>To be fair and prioritise those most in need.</p>	<p>100% agreement by tenants and waiting list applicants.</p>	<p>Accept change 2</p>

Change 3	<p><b>Clear definition of maximum pitch occupancy for single and double pitches.</b></p>	<p>To maintain space standards for fire prevention.</p> <p>Improve understanding of residents.</p> <p>Be explicit in the policy.</p> <p>To be upfront about future pitch use and occupancy.</p>	<p>100% agreement by tenants and waiting list applicants.</p>	<p>Accept change 3</p>
Change 4	<p><b>Required permission for additional caravans/occupancy.</b></p> <p>Confirm that permission is required from the landlord.</p>	<p>Comply with space standards for fire prevention.</p> <p>Promote understanding of residents.</p> <p>Improvement of ongoing site management.</p>	<p>100% agreement by tenants and waiting list applicants.</p>	<p>Accept change 4</p>
Change 5	<p><b>Information sharing, confidentiality and data protection/GDPR.</b></p> <p>Include a statement about how we use and retain data.</p>	<p>Comply with legislation.</p> <p>Be explicit on how personal information is used.</p>	<p>100% agreement by tenants and waiting list applicants.</p>	<p>Accept change 5</p>



Change 6	<p><b>Ensure banding priorities for highest band are comprehensive.</b></p> <p>E.g. Add to Platinum Band – you have a caravan or access to a caravan, which is your principal home, but nowhere to locate it (for at least six months). You may need to provide evidence of this and a home visit will be required to verify.</p>	To ensure that priorities are comprehensive and applicants who are roadside for six months or over are prioritised for a settled pitch and access to facilities where they have a local connection to Doncaster.	100% agreement by tenants and waiting list applicants.	Accept change 6
Change 7	<p><b>Inclusion of exceptional circumstances.</b></p> <p>Be clear on what other circumstances may be taken into account in prioritising applicants in addition to the priority bands where there is supporting information to confirm. Examples include:</p> <ul style="list-style-type: none"> <li>• Support, caring and access to care</li> <li>• Medical and health circumstances</li> <li>• Needing to be close to specialist education facilities</li> </ul>	To have a clear rehousing policy in line with best practice.	100% agreement by tenants and waiting list applicants.	Accept change 7
Change 8	<p><b>Ensure that the local connection criteria is fair and recognises cultural differences.</b></p> <p>E.g. travelling out of area for part of the year.</p>	To make sure we take into account culture and lifestyle in assessing proof of local connection to Doncaster and have regard to case law.	100% agreement by tenants and waiting list applicants.	Accept change 8

<p>Additional Change 9</p>	<p><b>Fair and proportionate consultation with residents about new allocations to ensure community cohesion.</b></p>	<p>To recognise that the community is clan/family based and to avoid community tension. The discretion for refusal is already provided for in the policy. Consultation would be in accordance with best practice and an explicit part of the application and allocation process.</p>	<p>Issue raised by 7 consulted residents.</p>	<p>Accept change 9</p>
<p>Additional Change 10</p>	<p><b>Restrict anyone pulling onto site without permission from joining the waiting list for a 6-month period (dependent on circumstances).</b></p>	<p>To deter people from pulling onto site without permission and restricting their access to a pitch dependent on their circumstances.</p>	<p>Raised by housing management and enforcement teams, as well as 1 consulted resident.  Outlined in other local authority pitch allocation policies.</p>	<p>Accept change 10</p>

# **EQUALITY, DIVERSITY AND INCLUSION**

## **CITY OF DONCASTER COUNCIL**

### **Due Regard Statement Template**

How to show due regard to the equality duty in how we develop our work and in our decision making.

## **Due Regard Statement**

A **Due Regard Statement** (DRS) is the tool for capturing the evidence to demonstrate that due regard has been shown when the council plans and delivers its functions. A Due Regard Statement must be completed for all programmes, projects and changes to service delivery.

- A DRS should be initiated at the beginning of the programme, project or change to inform project planning
- The DRS runs adjacent to the programme, project or change and is reviewed and completed at the relevant points
- Any reports produced needs to reference “Due Regard” in the main body of the report and the DRS should be attached as an appendix
- The DRS cannot be fully completed until the programme, project or change is delivered.

<p><b>1 Name of the ‘policy’ and briefly describe the activity being considered including aims and expected outcomes. This will help to determine how relevant the ‘policy’ is to equality.</b></p>	<p>Review of Doncaster Council’s Pitch Allocation Policy for Council Owned Gypsy and Traveller Sites. This policy sets out the criteria for access to site pitches. Gypsy and Traveller sites are primarily regulated by the Mobile Homes Act 1983, following amendments made to that Act by the Housing and Regeneration Act 2008.</p> <p>There were 8 suggested changes consulted on within the consultation period from February to May 2023, including a 12 week public consultation with residents and waiting list applicants. Following the consultation there are two additional changes proposed after consideration of all feedback. These are Change 9 and 10.</p> <p>Changes are being made to ensure that the policy is fit for purpose and prioritises those most in need, whilst respecting cultural differences. This policy covers 65 pitches across four Council Owned Gypsy and Traveller Sites.</p> <p>During the consultation, most residents and applicants did not want to fully disclose their status in terms of each protected characteristic ,due to privacy. We respected this and have included the information we have available on our housing management system.</p> <p><b>Change 1: Be clear on who is not eligible to be considered.</b></p> <p>E.g. those under 18 or those subject to immigration control who are not eligible for housing assistance.</p> <p><b>Why?</b> Be explicit in the policy. Be clear on legal requirements. Promote understanding.</p>
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**Change 2: Be clear on who does not qualify to join the waiting list.**

Can include persons:

- Involved in anti-social behaviour which has or is likely to cause serious nuisance to neighbours
- Who have deliberately worsened their circumstances to obtain additional priority
- Rent arrears
- Provided false information or deliberately withheld information
- Those occupying a current site without permission dependent on the circumstances

**Why?** To be fair and prioritise those most in need

**Change 3: Clear definition of maximum pitch occupancy for single and double pitches.**

**Why?** To maintain space standards for fire prevention. Improve understanding of residents. Be explicit in the policy to be upfront about future pitch use and occupancy.

**Change 4: Confirm that permission is required from the landlord for additional caravans/occupancy.**

**Why?** Comply with space standards for fire prevention. Promote understanding. Improvement of ongoing site management.

	<p><b>Change 5: Information sharing, confidentiality and data protection/GDPR. Include a statement about how we use and retain data.</b></p> <p><b>Why?</b> Comply with legislation. Be explicit on how personal information is used.</p> <p><b>Change 6: Ensure banding priorities for highest band are comprehensive.</b></p> <p>E.g. Add to Platinum Band - you have a caravan or access to a caravan, which is your principal home, but nowhere to locate it (for at least six months). You may need to provide evidence of this and a home visit will be required to verify.</p> <p><b>Why?</b> To ensure that priorities are comprehensive and applicants who are roadside for 6 months or over are prioritised for a settled pitch and access to facilities where they have a local connection to Doncaster.</p> <p><b>Change 7: Inclusion of exceptional circumstances.</b></p> <p>Be clear on what other circumstances may be taken into account in prioritising applicants in addition to the priority bands where there is supporting information to confirm. Examples such as:</p> <ul style="list-style-type: none"> <li>• Support, Caring and access to care</li> <li>• Medical and Health circumstances</li> <li>• Needing to be close to specialist education facilities</li> </ul> <p><b>Why?</b> To have a clear rehousing policy in line with best practice.</p>
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		<p><b>Change 8: Ensure that the local connection criteria is fair and recognises cultural differences.</b></p> <p>E.g. travelling out of area for part of the year.</p> <p><b>Why?</b> To make sure we take into account culture and lifestyle in assessing proof of local connection to Doncaster and have regard to case law.</p> <p><b>Change 9 (additional proposed change): Fair and proportionate consultation with residents about new allocations to ensure community cohesion.</b></p> <p><b>Why?</b> To recognise that the community is clan and family based and to avoid community tension. The discretion for refusal is already provided for in the policy. Consultation would be in accordance with best practice and an explicit part of the application and allocation process.</p> <p><b>Change 10 (additional proposed change): Restricting anyone pulling onto site without permission, who we do not agree to rehouse from joining the waiting list for a 6 month period or having an existing applications suspended.</b></p> <p><b>Why?</b> To deter people from pulling onto site without permission and restricting their access to a pitch dependent on their circumstances.</p>
2	<b>Service area responsible for completing this statement.</b>	<p>SLHD Housing and Customer Services on behalf of Doncaster Council.</p> <p>Doncaster Council Legal Services</p>



<p><b>3 Summary of the information considered across the protected groups.</b></p> <p><b>Service users/residents</b></p> <p><b>Doncaster Workforce</b></p>	<p><i>Please document the data and information sources that you have used to understand the needs, participation and experiences of each protected group: Age, Disability, Race, Sex, Sexual Orientation, Religion and Belief, Maternity and Pregnancy, Gender Reassignment, Marriage and Civil Partnership.</i></p> <p><i>Doncaster have chosen to add three additional groups, with a fourth, Leaving Care, pending approval, which are not included in the Equalities Act 2010: These are:</i></p> <ul style="list-style-type: none"> <li>• <i>Armed Forces and Veterans</i></li> <li>• <i>Homelessness</i></li> <li>• <i>Socio-economic</i></li> <li>• <i>Leaving Care</i></li> </ul> <p>Protected characteristic information is limited from those consulted with due to lack of disclosure. We have data on Age, Sex and ethnicity of current site residents which is set out below.</p> <p><b>Age</b> 57.5% of site tenants are aged 45 and over.</p> <table border="1" data-bbox="725 831 1977 1177"> <thead> <tr> <th></th> <th>16 - 24</th> <th>25 - 34</th> <th>35 - 44</th> <th>45 - 54</th> <th>55 - 64</th> <th>65+</th> <th>DNK</th> </tr> </thead> <tbody> <tr> <td>White Towers</td> <td>0</td> <td>0</td> <td>2</td> <td>0</td> <td>2</td> <td>5</td> <td>1</td> </tr> <tr> <td>Little Lane</td> <td>1</td> <td>1</td> <td>0</td> <td>2</td> <td>2</td> <td>1</td> <td>1</td> </tr> <tr> <td>Land's End</td> <td>2</td> <td>5</td> <td>6</td> <td>1</td> <td>5</td> <td>2</td> <td>0</td> </tr> <tr> <td>Nursery Lane</td> <td>0</td> <td>0</td> <td>0</td> <td>0</td> <td>1</td> <td>0</td> <td>0</td> </tr> <tr> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td><b>TOTAL</b></td> <td>3</td> <td>6</td> <td>8</td> <td>3</td> <td>10</td> <td>8</td> <td>2</td> </tr> <tr> <td><b>% of all current residents</b></td> <td>7.50%</td> <td>15%</td> <td>20%</td> <td>7.50%</td> <td>25%</td> <td>20%</td> <td>5%</td> </tr> </tbody> </table> <p><b>Disability</b> We do not have this information due to lack of disclosure.</p> <p><b>Race</b> Gypsy and Travellers are classed as their own Ethnic Group.</p>		16 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65+	DNK	White Towers	0	0	2	0	2	5	1	Little Lane	1	1	0	2	2	1	1	Land's End	2	5	6	1	5	2	0	Nursery Lane	0	0	0	0	1	0	0									<b>TOTAL</b>	3	6	8	3	10	8	2	<b>% of all current residents</b>	7.50%	15%	20%	7.50%	25%	20%	5%
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<b>% of all current residents</b>	7.50%	15%	20%	7.50%	25%	20%	5%																																																										

**Sex**

Existing tenants on site are 75% female and 25% male.

	Male	Female
White Towers	5	5
Little Lane	2	6
Land's End	2	19
Nursery Lane	1	0
TOTAL	10	30
% of all current residents	25%	75%

**Gender Reassignment**

We do not have this information due to lack of disclosure.

**Sexual Orientation**

We do not have this information due to lack of disclosure.

**Religion and Belief**

We do not have this information due to lack of disclosure.

**Armed Forces and Veterans**

We do not have this information due to lack of disclosure.

**Change 1: Be clear on who is not eligible to be considered.**

Protected Characteristic	Impact
Age	Neutral
Disability	Neutral
Race	Neutral
Sex	Neutral
Sexual Orientation	Neutral
Religion and Belief	Neutral

<b>Maternity and Pregnancy</b>	Neutral
<b>Gender Reassignment</b>	Neutral
<b>Marriage and Civil Partnerships</b>	Neutral
<b>Veterans</b>	Neutral
<b>Homelessness</b>	Neutral
<b>Socio-economic</b>	Neutral
<b>Leaving Care</b>	Neutral

**Change 2: Be clear on who does not qualify to join the waiting list.**

<b>Protected Characteristic</b>	<b>Impact</b>
<b>Age</b>	Neutral
<b>Disability</b>	Neutral
<b>Race</b>	Neutral
<b>Sex</b>	Neutral
<b>Sexual Orientation</b>	Neutral
<b>Religion and Belief</b>	Neutral
<b>Maternity and Pregnancy</b>	Neutral
<b>Gender Reassignment</b>	Neutral
<b>Marriage and Civil Partnerships</b>	Neutral
<b>Veterans</b>	Neutral
<b>Homelessness</b>	Neutral
<b>Socio-economic</b>	Neutral
<b>Leaving Care</b>	Neutral

**Change 3: Clear definition of maximum pitch occupancy for single and double pitches.**

<b>Protected Characteristic</b>	<b>Impact</b>
<b>Age</b>	Neutral
<b>Disability</b>	Neutral
<b>Race</b>	Neutral
<b>Sex</b>	Neutral
<b>Sexual Orientation</b>	Neutral
<b>Religion and Belief</b>	Neutral
<b>Maternity and Pregnancy</b>	Neutral
<b>Gender Reassignment</b>	Neutral
<b>Marriage and Civil Partnerships</b>	Neutral
<b>Veterans</b>	Neutral
<b>Homelessness</b>	Neutral
<b>Socio-economic</b>	Neutral
<b>Leaving Care</b>	Neutral

**Change 4: Confirm that permission is required from the landlord for additional caravans/occupancy.**

<b>Protected Characteristic</b>	<b>Impact</b>
<b>Age</b>	Neutral
<b>Disability</b>	Neutral
<b>Race</b>	Neutral
<b>Sex</b>	Neutral
<b>Sexual Orientation</b>	Neutral
<b>Religion and Belief</b>	Neutral
<b>Maternity and Pregnancy</b>	Neutral

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	<p><b>Change 5: Information sharing, confidentiality and data protection/GDPR. Include a statement about how we use and retain data.</b></p>																												
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**Change 6: Ensure banding priorities for highest band are comprehensive.**

Protected Characteristic	Impact	Further Explanation
Age	Neutral	
Disability	Positive	This change ensures that those with a housing need related to health and care will be included
Race	Neutral	
Sex	Neutral	
Sexual Orientation	Neutral	
Religion and Belief	Neutral	
Maternity and Pregnancy	Neutral	
Gender Reassignment	Neutral	
Marriage and Civil Partnerships	Neutral	
Veterans	Neutral	
Homelessness	Positive	This change ensures that those in high housing need are included in the priority bands as well as statutory homeless households
Socio-economic	Neutral	
Leaving Care	Neutral	

**Change 7: Inclusion of exceptional circumstances.**

Protected Characteristic	Impact	Further Explanation
Age	Positive	As care and access to care is an example, this will support the community, including older residents in this being considered in the process. There is also a culture of extended family living and support in the Gypsy and traveller community.

	<b>Disability</b>	Positive	This change supports consideration of individual circumstances, including disabilities, to determine priorities for allocation	
	<b>Race</b>	Neutral		
	<b>Sex</b>	Neutral		
	<b>Sexual Orientation</b>	Neutral		
	<b>Religion and Belief</b>	Neutral		
	<b>Maternity and Pregnancy</b>	Positive	This change supports consideration of individual circumstances, including maternity and pregnancy, to determine priorities for allocation including where support may be required	
	<b>Gender Reassignment</b>	Neutral		
	<b>Marriage and Civil Partnerships</b>	Neutral		
	<b>Veterans</b>	Neutral		
	<b>Homelessness</b>	Positive	This change enables flexibility in identifying those most in need and homeless prevention	
	<b>Socio-economic</b>	Neutral		
	<b>Leaving Care</b>	Positive	This change enables flexibility in identifying the most in need and vulnerable	
	<b>Change 8: Ensure that the local connection criteria is fair and recognises cultural differences.</b>			
	<b>Protected Characteristic</b>	<b>Impact</b>	<b>Further Explanation</b>	
	<b>Age</b>	Neutral		
	<b>Disability</b>	Neutral		
	<b>Race</b>	Positive	This ensures we reflect the cultural traditions of Gypsy and Travellers when applying a local connection criteria.	
	<b>Sex</b>	Neutral		

<b>Sexual Orientation</b>	Neutral	
<b>Religion and Belief</b>	Neutral	
<b>Maternity and Pregnancy</b>	Neutral	
<b>Gender Reassignment</b>	Neutral	
<b>Marriage and Civil Partnerships</b>	Neutral	
<b>Veterans</b>	Neutral	
<b>Homelessness</b>	Neutral	
<b>Socio-economic</b>	Neutral	
<b>Leaving Care</b>	Neutral	

**Change 9: Fair and proportionate consultation with residents about new allocations to ensure community cohesion**

<b>Protected Characteristic</b>	<b>Impact</b>	<b>Further Explanation</b>
<b>Age</b>	Neutral	
<b>Disability</b>	Neutral	
<b>Race</b>	Positive	This will support sustainable tenancies and mitigate conflict, in recognition of the clan based community
<b>Sex</b>	Neutral	
<b>Sexual Orientation</b>	Neutral	
<b>Religion and Belief</b>	Neutral	
<b>Maternity and Pregnancy</b>	Neutral	
<b>Gender Reassignment</b>	Neutral	
<b>Marriage and Civil Partnerships</b>	Neutral	
<b>Veterans</b>	Neutral	



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**4 Summary of the consultation/engagement activities**

**Advice and Support in developing the consultation**

Advice and support was sought from the National Gypsy and Traveller advisory panel with associated Good Practice guides. National Charity, Friends, Families and Travellers. The Oak Project, a 3-year partnership with Gypsies & Travellers, National Policy Advisory Panel on Gypsy and Traveller Housing and the Housing Diversity Network.

**Elected members and Portfolio Holder**

The review process began in February 2023 when suggested changes and the scope of the review were discussed with the Housing Portfolio Holder, and focus groups held with eleven elected member representing the relevant wards. These were informed by best practice, feedback from staff, stakeholders, customers and corporate priorities. A presentation and newsletter were used to communicate the review and consultation.

**Employee groups**

Two employee groups were consulted with across Access to Homes and Housing and Customer Services whose role in directly/indirectly impacted by the policy. They were also given information to support customers in taking part in the consultation.

**Stakeholders**

Stakeholders included Doncaster Council Enforcement Team, Public Health, and Education services, NHS Health Services, South Yorkshire Police and SLHD Housing Management.

**Public Consultation**

Public consultation began on Monday 20<sup>th</sup> February 2023 for a period of 12 weeks with a focus on face to face consultation, multiple site visits and personal contact with waiting list applicants to remove barriers relating to literacy.

**Community Engagement**

Community Engagement with site residents has been high, with 95% (38) seen in person and also 100% (28) of the waiting list contacted with a 54% (15) response rate.

		<p><b>Legal Input</b> Advice and support throughout from Doncaster Council Legal Services.</p>
5	<p><b>Real Consideration:</b></p> <p><b>Summary of what the evidence shows and how has it been used</b></p>	<p>There are positive impacts on protected groups in the ten proposed changes, particularly around impact on homeless households, which supports one of the aims of the policy. There are 10 potential positive/negative impacts which will need to be monitored.</p> <p>Staff and stakeholders were empowered to assist and support the public to complete the survey to ensure that no one was excluded for participating.</p> <p>Vulnerability is actively identified throughout the application and offer process and appropriate support given, pro-active work with individuals, advocates and family members to ensure that they are not disadvantaged through this process. Throughout the consultation it was evident that there is a high level of trust between the community and SLHD Housing Management Officer.</p>
6	<p><b>Decision Making</b></p>	<p>A summary of the overall findings of this statement have been included within the relevant reports as well as being attached in full as Background Papers.</p> <p>Cabinet will consider this report on the 16 August 2023 following input from</p> <ul style="list-style-type: none"> <li>• SLHD Executive Management Team (completed)</li> <li>• Doncaster Council Executive Leadership Team (completed)</li> <li>• Feedback from Scrutiny on consultation process (completed)</li> <li>• Doncaster Council Executive Board (completed)</li> <li>• Feedback from Scrutiny on the policy changes</li> </ul>
7	<p><b>Monitoring and Review</b></p>	<p>Activity under this process will be reported to SLHD Director of Housing and Customer Services.</p> <ul style="list-style-type: none"> <li>• The process will be reviewed for its effectiveness after 12 months with agreed performance indicators to identify if the policy is fulfilling its objectives and if there are any unexpected consequences or changes in priority that need to be addressed.</li> </ul>

8	<b>Sign off and approval for publication</b>	<i>*To be completed on approval of the recommended policy changes*</i>
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# City of Doncaster Council

## Gypsy and Traveller Allocation Policy Review

### Consultation Outcomes

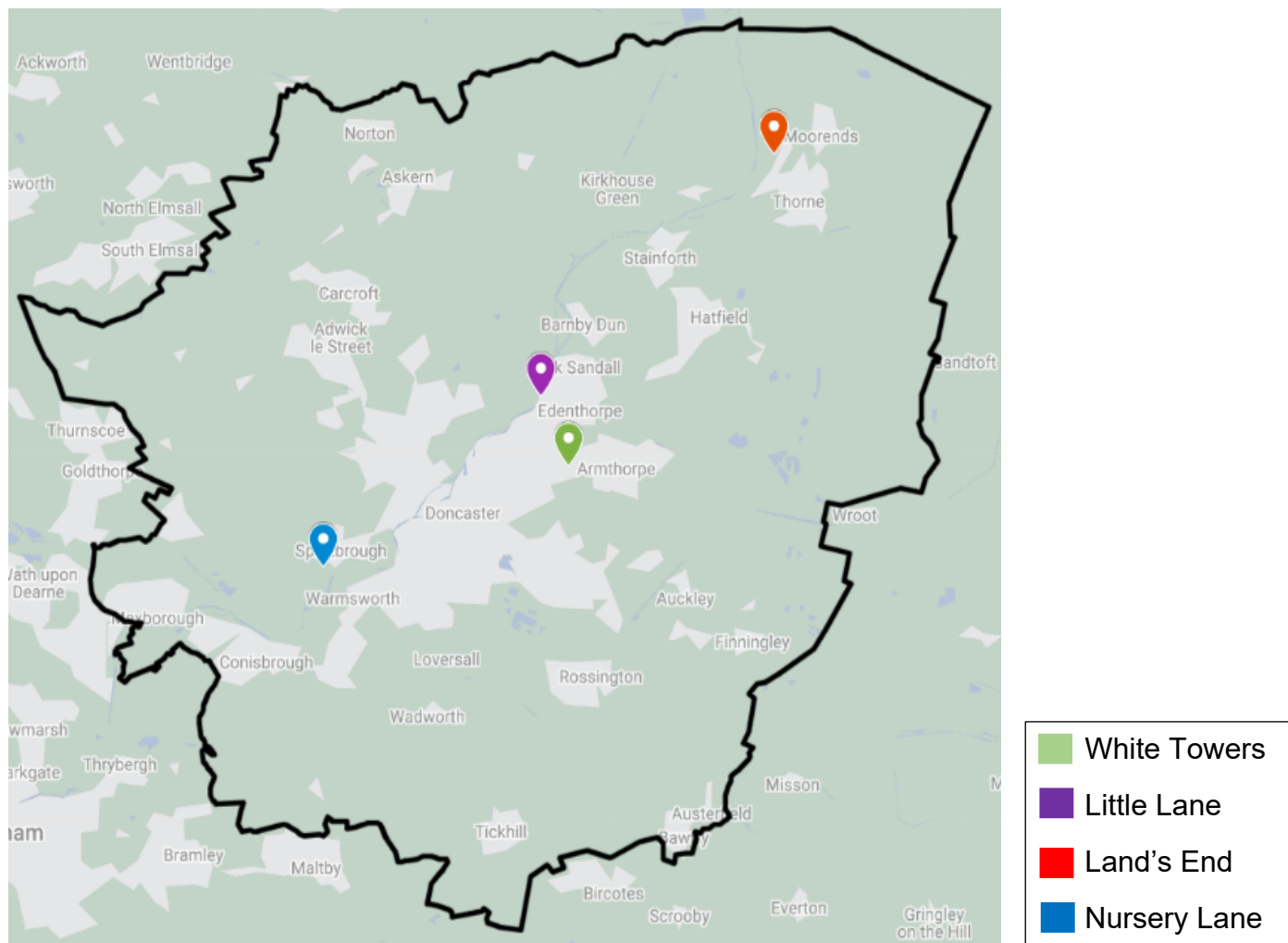
<p>What was the consultation about and who was consulted?</p>	<p>Proposed amendments to City of Doncaster Council's Gypsy and Traveller Pitch Allocation Policy.</p> <p>This policy sets out the framework for allocating caravan pitches on council-owned sites in Doncaster. Gypsy and Traveller sites transferred over to St Leger Homes of Doncaster in 2014. The existing policy is outdated and awareness from site residents and those on the waiting list is low.</p> <p>There were eight proposed changes approved for Public Consultation.</p> <p>This consultation aimed to gather opinions from stakeholders, current site residents and waiting list applicants on the proposed changes and also provide an opportunity to comment on any gaps in policy.</p>
<p>Over what period did the consultation run?</p>	<p>Stakeholder and public consultation was carried out simultaneously over a 12-week period, starting on 20<sup>th</sup> February 2023 and finishing on 10<sup>th</sup> May 2023.</p>
<p>How many responses were received?</p>	<ul style="list-style-type: none"> <li>• 53 responses were received from the public consultation</li> <li>• 22 additional comments</li> </ul>
<p>Where will the results be published?</p>	<p>Results will be published on the council's website <a href="http://www.doncaster.gov.uk">www.doncaster.gov.uk</a> as part of the decision making process.</p>
<p>How will the results be used?</p>	<p>To inform recommendations of which amendments are adopted in the policy as part of the decision making process.</p>

## Map of Gypsy and Traveller Sites

The map below shows the location of the four council-owned Gypsy and Traveller sites within the Doncaster area. These are:

- White Towers, Armthorpe (23 pitches)
- Little Lane, Long Sandall (10 pitches)
- Land's End, Thorne (22 pitches)
- Nursery Lane, Sprotbrough (10 pitches)

Across the four council-owned sites, there are a total of 65 pitches.



## Stakeholder Consultation

At the beginning of the policy review, advice and support was sought from the National Gypsy and Traveller advisory panel.

As part of stakeholder consultation, focus groups were held with eleven elected members representing the relevant wards. Additional consulted stakeholders included:

- Doncaster Council Enforcement Team
- Public Health
- Education Services
- NHS Health Services
- South Yorkshire Police
- SLHD Housing Management

A presentation detailing the proposed changes to the City of Doncaster Council's Gypsy and Traveller Allocation Policy facilitated this initial discussion.

## Public Consultation

Eight proposed changes were approved for public consultation. These were:

1. Be clear on who cannot join the waiting list for legal reasons. For example, those under 18 or those subject to immigration control who are not eligible for housing assistance. **Why?** To be clear on the council's legal duties.
2. Be clear on who does not qualify to join the waiting list. For example, based on antisocial behaviour or debt. **Why?** To be fair and prioritise those most in need.
3. Be clear on the maximum pitch occupancy for single and double pitches. **Why?** To make sure we meet space standards for fire prevention.
4. Confirm that permission is needed from the landlord for more caravans and/or people being moved onto the site. **Why?** To promote understanding and site management. To comply with space standards for fire prevention.
5. Include a statement about how the council uses, keeps and shares information. **Why?** To meet data protection law and explain how we use information.
6. Review the highest Platinum Band reasons. For example, making sure that applicants who are roadside for six months or more with a local connection to Doncaster are given high priority for a settled pitch and access to facilities. **Why?** To ensure that priorities are comprehensive.
7. Be clear on what exceptional circumstances may be taken into account in prioritising applicants in addition to the priority bands where there is supporting information to confirm. **Why?** To have a clear rehousing policy in line with best practice.

8. Ensure that the local connection criteria is fair and recognises cultural differences e.g. travelling out of area for part of the year. **Why?** To make sure we take into account culture and lifestyle in assessing proof of local connection to Doncaster. To have regard to case law.

In order to remove literacy barriers prevalent among the Gypsy and Traveller community, public consultation on the proposed policy changes was carried out through face to face discussions with current site residents and direct telephone contact with active waiting list applicants. Face to face consultation with current site residents was supported by a newsletter which outlined clearly the proposed changes. Each site was visited at least twice to maximise the opportunity for face to face consultation with residents.

Engagement with site residents was high, with 95% seen in person. In addition to this, 100% of the waiting list was contacted, with a response rate of 54%.

In total, there were 53 responses from current site residents and waiting list applicants. None of the proposed policy changes were particularly contentious and as such, all eight proposals were fully supported by all responding consultees. 22 additional comments were also noted and a summary of these can be found at the end of this document.

A breakdown of the consultation by site can be seen below:

#### Face to face site consultation

	No. of current site residents	No. consulted with
White Towers	10	10
Little Lane	8	7
Land's End	21	20
Nursery Lane	1	1

#### Telephone waiting list consultation

	No. on waiting list	No. consulted with
White Towers	12	7
Little Lane	3	2
Land's End	9	4
Nursery Lane	4	2



## Additional Comments

All the additional comments received during consultation with current site residents and active waiting list applicants are listed below. The table outlines the common themes mentioned within the additional comments.

Theme	Mentions
Pitch sizes / number of trailers should account for age and sex of children.	8
Tenants should be consulted before new allocations are made to avoid community tension.	7
People already living on site should be sorted first.	4
No transit site in Doncaster for visiting families.	3
Caring responsibilities on site.	2
Site improvement works.	2
Unauthorised residents should not be allowed on waiting list.	1
Relatives waiting for pitch allocation.	1
Make new tenants pay a bond.	1

- Caring for parents, wants own pitch.
- Re change three: new plans need to take into account need for trailers as separate space for older children and/or different sex. Also visiting family as no transit site in Doncaster. Pitches need minimum of two trailers permanently on pitch. Tenants should be consulted before a new pitch is let to ensure no community tension. Tenants on site need sorting first.
- Thinks residents should be consulted before anyone new is allocated a pitch as there are specific families that have intimidated residents and caused issues on site. Thinks people who pull onsite without permission and aren't going to be considered for a pitch should not be able to join the list straight away to bypass others.
- They have two trailers on the pitch with a third needed for daughter in law with caring responsibilities. Need to reflect community needs.
- Re change three: has seven children and needs separate trailer on pitch to accommodate adult son with learning disabilities as needs to be separate from younger children.
- Support all proposals. Thinks community should be consulted before new tenant accepted to ensure no community tension.

- Need at least two trailers on site. Son is temp on pitch one as is caring for them. Want him to be considered. Think people on site already need to be sorted with pitches before considering anyone else.
- No transit site in Doncaster so family stay over when travelling here for funerals etc. Number of trailers on pitches dictated by family size and ages/sexes of children. At present, no issues on site. Everyone gets on so would want to be consulted before anyone new is allocated a pitch to ensure no community tension.
- Has a number of relatives recently moved onto her pitch who are wanting a site pitch and are on the waiting list.
- Re change three: needs two trailers on pitch as family stop over to care for him and wife. Family also come and visit as no transit site in Doncaster.
- Re change three: needs at least two pitches per plot as family visit. Also thinks that community need to be consulted before a new pitch is allocated to make sure there is no community tension. Wants to move to larger pitch across from her. Thinks priority should be given to existing tenants on site. Concerned re planning proposals and offered to speak to people doing the plans as is worried that they aren't going to meet residents' needs.
- Moved on with permission. Related to site occupants and wants to stay. Agreed with all changes, just thinks should sort out people on site first before letting anyone new on to avoid problems. Quiet site, no problems. Thinks pitch space should be taken into account for visiting family and individual needs with number of trailers.
- Agree with all. Concerned about plot reducing.
- Thinks people who pull on without permission just before a pitch comes up shouldn't be considered and that people's previous addresses and reasons for leaving, medical proof etc.
- Has two trailers. Needs to take into account visiting family on pitches.
- Need to take into account no. of trailers for different sex / age of children.
- Settled site so should check with residents before allocating any new pitches.
- Should make new tenants pay a bond like they used to.
- Needs two trailers on plot for grandchildren.
- Needs an extra van on the pitch.

- Not impressed with repairs service and issues with potential flooding.
- Thinks they should have a say in who is allocated pitches on site. Major work needed to improve site quality.

## Demographic Information

Disclosure of demographic information and protected characteristics by existing tenants and waiting list applicants was limited. As such, we are only able to accurately report on demographic information already held by housing management (age and gender of existing tenants). This information is based on the named tenants of site pitches.

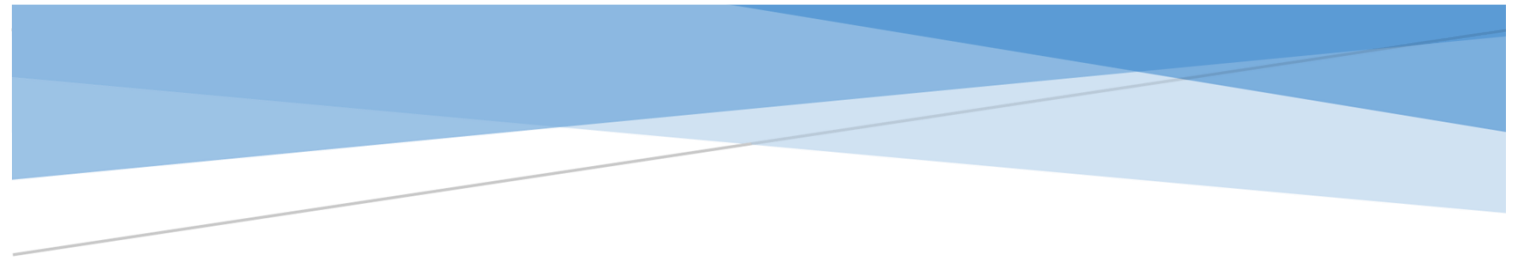
### Age

	16 - 24	25 - 34	35 - 44	45 - 54	55 - 64	65+	DNK
White Towers	0	0	2	0	2	5	1
Little Lane	1	1	0	2	2	1	1
Land's End	2	5	6	1	5	2	0
Nursery Lane	0	0	0	0	1	0	0
<b>TOTAL</b>	3	6	8	3	10	8	2
<b>% of all current residents</b>	7.50%	15%	20%	7.50%	25%	20%	5%

### Gender

	Male	Female
White Towers	5	5
Little Lane	2	6
Land's End	2	19
Nursery Lane	1	0
<b>TOTAL</b>	10	30
<b>% of all current residents</b>	25%	75%

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City of Doncaster Council

# Gypsy and Travellers Allocations Policy

August 2023

DK

<b>Policy Changes</b>	<b>Description</b>	<b>Section</b>
Change 1	Eligibility to join waiting list	3
Change 2	Non-qualifying	4.1
Change 3	Maximum pitch occupancy	7.4
Change 4	Permission for additional caravans/occupancy	7.4
Change 5	Information sharing / GDPR	2.4
Change 6	Comprehensive banding priorities	6.0
Change 7	Inclusion of exceptional circumstances	6.6
Change 8	Fair local connection criteria	4.2
Change 9	Resident consultation about new allocations	6.2
Change 10	6-month suspension penalty	4.3

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# 1 Glossary of Terms

## Anti-Social Behaviour

Behaviour or conduct causing or likely to cause nuisance, annoyance, harassment, alarm or distress to another person.

## Applicant

A person who applies to be placed on the waiting list for a pitch allocation.

## Bands

The system for setting out the different priorities of housing need.

## Disabled

Persons who have a physical or mental impairment that has a 'substantial' and 'long-term' negative effect on their ability to do normal daily activities as set out in the Equality Act 2010.

## Eligibility

Assessment of whether an applicant has a right to a pitch allocation in accordance with relevant legislation.

## Gypsy and Traveller

The travelling community is a term used to describe people with a nomadic lifestyle.

The travelling community includes:

- Romany Gypsies
- Irish Travellers
- Scottish Gypsies and Travellers
- Welsh Gypsies and Travellers
- New Travellers or New Age Travellers
- barges and other people living in boats
- fairground and circus families, known as travelling showmen

## Housing Need

Applicants are assessed as having a housing need if the accommodation they currently occupy is unsuitable and where applicants are unable to resolve their circumstances. This can be as a result of ill health, overcrowding, lacking facilities or



the applicant is otherwise deemed to be in a reasonable preference group as defined in housing law.

### **Housing Related Debt**

Monies owed to a landlord, such as a Local Authority, Housing Association, Arm's Length Management Company or for temporary housing accommodation provided under homeless duties, hostels or supported housing projects, in respect of current or former tenancies. It can also include other debts such as re-chargeable repairs, court cost, support charges and prevention fund monies (e.g., bonds, rent in advance). Debts written off as part of bankruptcy or which are statute barred will be disregarded. DEBT means TRUE debt and does not include arrears where the housing provider is in receipt of regular housing benefit payment or direct debit / standing order which clear the rent account. Housing related debt does not include council tax debts.

### **Local Connection**

Connection to a particular area because of residency in an area through their own choice, employment, family or a main source of support. Local connection to Doncaster for this purpose is defined as

- A minimum 3-year connection including residence/employment and direct family members or have special circumstances that connect them to Doncaster. Direct family members are spouses, civil partners, parents, grandparents, sons, daughters, brothers or sisters

When making this decision we will take into account when applicants are travelling outside of the borough where their main residence continues to be in Doncaster.

### **Pitch**

The space of land on a Gypsy and Traveller site rented to a sole or joint applicant and his/her family under the provision of the Mobile Homes Act 1983. Each pitch on a council site includes an amenity block with kitchen and bathroom.

### **Qualification**

Assessment of whether an applicant qualifies to join the waiting list under the qualification criteria set by the City of Doncaster Council.

### **Registration Date**

The date a complete application, with all required supporting information, is received. This date will be used to decide who receives an offer of accommodation.

**Site**

A Gypsy and Traveller site is the area where Gypsies and Travellers live. One site may have a number of pitches and be home to a number of families.

**The Settled Community**

Refers to the non-travelling community (e.g., people who live in houses).

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## 2 Introduction

This is the City of Doncaster Council's Gypsy and Travellers Pitch Allocations Policy. The policy is operated on behalf of the City of Doncaster Council by its Arm's Length Management Organisation, St Leger Homes of Doncaster (SLHD).

### 2.1 Policy Aims and Objectives

This policy sets out how pitches are allocated in Council owned Gypsy and Traveller sites in Doncaster. The aims and objectives of the policy are to:

- **Give** priority to those most in need of settled accommodation
- Reflect local priorities
- Meet the legal requirements of the 1983 Mobile Homes Act
- Provide appropriate accommodation and support services to Gypsies and Travellers on the sites St Leger Homes of Doncaster manage on behalf of the City of Doncaster Council,
- Respect Gypsy and Traveller culture and traditions
- Ensure effective management of the sites and the protection of existing residents

### 2.2 Legal Framework

Gypsy and Traveller sites are primarily regulated by the Mobile Homes Act 1983, following amendments made to that Act by the Housing and Regeneration Act 2008. Doncaster has ensured the provision of its sites specifically to meet the local Gypsy and Traveller community. Therefore, to apply for a pitch, applicants must be a Gypsy or Traveller either by ethnic group or under the current legal definition. A 'Gypsy' is defined by section 24 of the Caravan Sites and Control Development Act 1960 as "persons of nomadic habit of life, whatever their race or origin...".

In terms of the allocation of plots on sites, the Housing Act 2004 (sections 225 and 226) previously imposed a specific duty on local authorities to carry out an assessment of the accommodation need of Gypsies and Travellers, as part of the periodic review of the housing conditions and need within their area, under section 8 of the Housing Act 1985. With effect from the 12<sup>th</sup> of July 2016, the Housing and Planning Act 2016 repealed those sections of the 2004 Act and made amendments to section 8 of the Housing Act 1985. This replaced the previous duty with a general duty to consider the housing needs of all persons, including those residing in or resorting to their area with respect to the provision of caravan sites.

A 'Caravan' is defined by section 29 of the Caravan Sites and Control of Development Act 1960 as "any structure designed or adapted for human habitation which is capable of being moved from one place to another (whether by being towed,

or being transported on a motor vehicle or trailer) and any motor vehicle or adapted..." and so would include the mobile homes located on the Council's sites.

## **2.3 Related Strategies**

This policy has regard to:

- Doncaster Council's Housing Strategy
- Doncaster Council's Tenancy Strategy
- Doncaster Council's Place Plan

## **2.4 Sharing Information and Confidentiality**

Information provided when anyone makes an application to join the waiting list and any information received in administering and processing an application will be treated as confidential in accordance with any relevant data protection legislation, in line with our privacy notices and those of St Leger Homes of Doncaster who deliver services on behalf of the council.

Information provided may also need to be shared with other 3<sup>rd</sup> party agencies (such as the police, probation service, social services, health authorities, other local authority departments and statutory bodies) to process your application and assess your housing need.

Information may be shared without the applicant's specific consent in the prevention and/or the detection of crime, the prevention and/or detection of fraud, in matters relating to safeguarding of an individual or others and/or any rule of common law and where necessary under the clauses or exemptions of the Data Protection Legislation and other statute and legal obligations.

# **3 Eligibility**

All applicants will be considered. Those who are assessed as not being eligible will be notified in writing. We will give the reasons why and inform applicants that they have the right to a review, as outlined in section 8.

## **3.1 Who is not eligible?**

- Those from abroad who have no right of access to public funds
- Ordinarily those under the age of 18 years old save in exceptional circumstances.

We will not offer a joint tenancy to two or more people where one party is ineligible.

The eligibility of persons, including those from abroad, is determined by the Secretary of State and is subject to change. We will have regard to any changes that occur after the publication of this policy.

Eligibility for an allocation may change over time. Therefore, acceptance onto the register does not guarantee that the applicant will be allocated accommodation. Eligibility will be confirmed again at the point of consideration of making an offer of a pitch and on review of their application. Where an applicant's circumstances change and they are no longer eligible, their application will be removed from the waiting list.

## 4 Qualification

In addition to being eligible, applicants need to then qualify to join the waiting list. Those who are assessed as non-qualifying will be notified in writing. We will give the reasons why and inform the applicant that they have the right to a review, as outlined in section 8.

### 4.1 Who does not qualify?

- Applicants or members of the household who own or have a financial interest in a pitch or property and are in a position to resolve their own housing situation
- Applicants or members of their household who have caused or are likely to cause serious nuisance to neighbours and the wider community
- Applicants or members of their household with a history of unsatisfactory tenancy conduct or behaviour
- Applicants or members of their household with housing related debt equivalent to 8 weeks rent arrears where there are no mitigating circumstances
- Applicants who have occupied a council owned Gypsy and Traveller site without the permission of St Leger Homes
- Applicants who deliberately worsen their circumstances with the intention of being prioritised
- Applicants who provide false information and/or deliberately withhold information

Couples who intend to live together should make a joint application. Qualification for an allocation may change over time (e.g., where there has been a change in the law or circumstances) therefore, acceptance onto the register does not guarantee that the person will be allocated a pitch. Qualification will be confirmed again at the point of consideration of making an offer of a pitch and on review of an application. Where an applicant's circumstances have changed and they no longer qualify, their application will be removed from the waiting list.

Where an applicant has previously been assessed as not qualifying, they can make a new application if they consider that they should now be treated as qualifying, The onus is on the applicant to demonstrate that their circumstances have changed.

## **4.2 Local Connection**

The Council understands that Gypsy and Traveller communities are diverse, and that many Gypsies and Travellers choose to live within small kin-based groups where they can enjoy the benefits of their extended family support which is an essential part of their culture. The Council will give preference to those families or individuals with a local connection to Doncaster.

Applicants must provide evidence that they have a local connection to Doncaster for a minimum of 3 years up to and including the date of their application.

A person has a local connection where:

- They have continuous residence for 6 out of the last 12 months or 3 of the last 5 years in Doncaster through their own choice – this does not include residence in prisons, institutions etc. or where they have been rehoused in temporary accommodation in the area by another Local Authority.
- They are currently employed in Doncaster and have been for the last 3 years.
- They have direct family who live in Doncaster and have done so for the last 3 years. Direct family members are spouses, civil partners, parents, grandparents, sons, daughters, brothers or sisters; or
- They have other special circumstances that connect them to Doncaster.

We will take into account the lifestyle of Gypsy and Travellers in terms of travelling within and outside of the borough where we are satisfied that Doncaster continues to be their main/sole residence.

## **4.3 Suspension**

Some circumstances may result in an application being suspended for up to 12 months. The circumstances this includes can be

- No longer qualifies to remain on them register
- Information received suggesting they no longer qualify to remain on the register requiring additional investigation
- Where an applicant has occupied a pitch on a council owned Gypsy and Traveller site without the landlord's consent their application may be suspended for a minimum of 6 months

# **5 Managing Applications**

## **5.1 How to apply**

Please contact our Gypsy and Traveller Officers in our Estates Management Team. Every applicant must make a formal application and we can provide support in completing this information where necessary.

An application will remain inactive until we receive all the information, we require to complete a full assessment. This means that we cannot allocate a pitch to the applicant during this period. All applicants will be subject to initial enquiries and references.

Applicants will be invited to meet with the Gypsy & Traveller Housing Officers to verify the information disclosed on the application, and to enable us to undertake an assessment of housing and support needs.

Once an application has been accepted, they will be placed on the waiting list and awarded the band which reflects their current circumstances.

## **5.2 What checks are made on applicants and what documents are needed?**

The onus is on the applicant to provide information to confirm their identity, residence and circumstances within 28 days of their original application or change in circumstances. Where the applicant fails to do so, we will not progress their application.

As a minimum requirement, all applicants must provide the following:

- Two forms of identification, one of which shows current address, and one of which confirms National Insurance number
- Photographic ID where available
- Confirmation of local connection
- Proof of Child Benefit/Child Tax Credit for dependent children
- Proof of residence of other household members
- Any evidence or information to support a priority
- Validation of information supplied from the Border and Immigration Agency, if from abroad, such as work permits and documentation
- Landlord references from a current and/or previous landlord where the applicant has been resident at the current address for less than 12 months
- Two referees where they have not held a tenancy of a pitch or accommodation previously

## **5.3 What happens if false information is provided or where relevant information is withheld?**

It is essential to supply the correct information. An applicant seeking to obtain accommodation or enhance their priority by making a false statement, by withholding relevant information, or by failing to tell SLHD Housing Management about any changes in circumstances, may not qualify to join or remain on the register. This applies to all stages of the application process.

## **5.4 Change in circumstances**

It is the applicant's responsibility to notify St Leger Homes Gypsy and Traveller Officers of any change in circumstances that could affect their application. The application will be reassessed based on their current circumstances and will be advised if their banding changes.

## 5.5 Review of the register

When the waiting list is reviewed, all applicants will be contacted and asked if they want to remain on the register.

Examples where applications will be cancelled include

- There is no response within 28 days
- Additional information requested is not provided within the given period
- An applicant requests that their application is cancelled
- Applicant has been rehoused elsewhere
- Applicant has purchased a pitch or property
- Applicant is no longer eligible/no longer qualifies to remain on the register

## 6.0 The Bands

### 6.1 How does the banding scheme work?

The policy is a banding scheme which determines the priority given to an applicant. Priority for vacant pitches will be given to applicants in the highest band first. If there is more than one applicant in the highest band at the time of allocation, preference will be given based on registration date.

### 6.2 Platinum Band

Urgent medical need such as in hospital unable to return to current home, unable to access essential facilities with evidenced medical need
Households who the law considers to be unintentionally homeless and in priority need
Applicants with children who have no settled accommodation including being roadside or moving between family members or friends for at least 6 months (you will need to provide evidence of this)
Urgent social and welfare need. This would include special guardians, holders of a residence order and family and friends who are not foster carers but who have taken on the care of a child because the parents are unable to provide care and has been approved by Children Services. Fleeing violence or harassment including Domestic Abuse.
Applicants giving or receiving essential care and or support where one party is an existing site resident

### 6.3 Gold Band



Applicants who are living on a site or in accommodation that is overcrowded where they have permission from the landlord to occupy
Assessed as threatened with homelessness through no fault of their own
In critical need due to medical / health / welfare reasons due to evidenced medical needs
Lack of access to facilities in current accommodation including disrepair

#### 6.4 Silver Band

Applicants with a Local connection
Substantial need due to medical / health / welfare reasons
Homeless without priority
Intentionally homeless with a priority need who are eligible and qualifying to join the register

#### 6.5 Bronze Band

Applicants from outside the local area will automatically be placed in the Bronze Band unless they are classed as having a Homeless Priority
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#### 6.6 Consideration of exceptional circumstances

We may, in exceptional circumstances, take other needs into account when prioritising applicants; An assessment of need will be made based on the information included on the application and any other supporting information.

Written evidence from a professional is required in these cases. Factors we may consider in exceptional circumstances include for example

- The need to be close to specialist educational facilities
- The need to be near medical or support facilities

## 7 Allocation of Pitches

### 7.1 How will an offer be made?

An offer of a pitch will be made both verbally and in writing. If an applicant fails to make contact with the Gypsy and Traveller Housing Officers after a period of 5 working days, the Council may withdraw the offer of a pitch and allocate it to the next appropriate applicant.

### 7.2 Compatibility

The compatibility of a new tenant with existing tenants on site is very important to ensure harmony and mutual respect within the community. Incompatibility can occur for a variety of reason such as religious practices, kinship, lifestyle, and personality. It is naïve to expect two families on a Gypsy and Travellers site who are

incompatible to live in close proximity without creating problems for themselves, the Council and the surrounding community.

Any final decision about applicants for re-housing on a site will be taken after full consideration with other households accommodated on the site, to ensure their kinship networks are not disrupted, and their cultural needs are respected. The Council, via the Gypsy & Traveller Housing Officers may be aware of reasons why an applicant would be incompatible for allocation of a pitch on a particular site.

It is important that this information is taken into account at the time of allocation. Where issues of incompatibility would appear to make an allocation unwise, the Gypsy & Traveller Housing Officers would seek authority from the Housing Management Service Manager to offer the pitch to the next highest waiting list applicant. The applicant will be given the reason for refusal and have the right to appeal.

### **7.3 Signing for a tenancy**

Applicants will have no legal right to the pitch until the Council has approved their application and they have entered into a tenancy/licence agreement.

The Gypsy & Traveller Housing Officers will ensure that the new residents sign their tenancy agreement, ensuring they understand their rights and responsibilities set out within it.

### **7.4 Maximum Pitch Occupancies**

Each plot has an amenity block with kitchen and bathroom facilities. Utilities are paid by the pitch holder to the relevant utility provider. Permission is for one touring or one static caravan per pitch. Requests for extra caravans or structures must be in writing and sent to St Leger Homes, permission may be granted depending on need and size of pitch. All decisions will be made in accordance with fire regulations.

### **7.5 Type of tenancy that will be offered**

You will be signed up to a site pitch agreement, which is a licence not a secure tenancy. There is no right to buy applicable.

### **7.6 Joint Tenancies**

New tenants are required to take up joint tenancies where appropriate. This includes:

- Married couples
- Applicants living together as a couple
- A person on the waiting list who wants to a joint tenancy with someone who has also made an application

### **7.7 Offers to Employees/Elected Members/Board Members**

In order to ensure that we are treating all applicants fairly, any applicants from employees of the City of Doncaster Council or SLHD, Elected Members or SLHD

Board Members and their relatives, must be disclosed on the application form. These applications will be processed in the normal way, but in order to demonstrate our allocation is both fair and transparent, offers will not be released without the approval of a Head of Service within SLHD or an appropriate designated officer.

## 8 Right of Review

Every application is made in accordance with the requirements set out in this policy document and any review will be considered by the SLHD Housing Management team for the following reasons and within the specified timescales.

### 8.1 Reasons for Review

Applicants are entitled to a review in the following circumstances:

- If it is decided that they are ineligible to join the waiting list. In this case, the applicant will be notified of the decision and the reason for it.
- If it is decided that they do not qualify to join the waiting list. In this case, the applicant will be notified of the decision and the reason for it.
- Where the applicant feels that they have been unfairly treated in the allocation process
- Where applicants disagree with their registration date.
- Where applicants disagree with a removal of their priority.
- Where applicants have been removed from the waiting list other than at their request.

### 8.2 The Review Process

In all review cases, an applicant must make a request within 28 days of the date of the letter informing them of the decision.

A request for review should be made in writing however, we will consider verbal requests in certain circumstances.

We aim to deal with an applicant's review within 28 days of receiving all documentation in support of the review. If we are unable to do so, we will acknowledge the review within that time, advising applicants when they may expect a reply.

Where an applicant asks for a review of the decision, they will receive details inviting them to submit any further written representations or new information with a bearing on the review and a deadline date will be given.

Applicants are not required to provide reasons for challenging the decision however, this may help their case as there may be new information which was not available at the time.

The officer involved in the original decision will not be involved in the review process.

If applicants are still not satisfied with the decision, a complaint can be made in accordance with St Leger Homes complaints procedure.

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## City of Doncaster Council

### Report

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Date: 16 August 2023

To the Mayor and Members of Cabinet

Report Title: City of Doncaster Council Local Lettings Policies Review

Relevant Cabinet Member(s)	Wards Affected	Key Decision?
Cllr Glyn Jones	All	Yes

### EXECUTIVE SUMMARY

1. This report sets out recommendations following the review of 10 Local Lettings Policies which sit outside of the main Housing Allocations Policy in place across the borough in the allocation of council homes. This follows Cabinet approval of a revised Housing Allocations Policy in November 2022 which makes provision for Local Lettings Policies to be applied to specific schemes.
  - 1.1. Recommendations are confirmed in **section 7**.
  - 1.2. A key part of the review process has been to undertake consultation with members, Strategic Housing, SLHD housing management and partners in Locality Meetings to share knowledge of the particular schemes and also the wider area. The review has been led by the SLHD Access and Allocations Service Manager.
  - 1.3. The overall objectives of Local Lettings Policies are to:
    - Support housing management and/or strategic objectives by restricting or prioritising allocations for a certain area or scheme by excluding certain groups of people who have an active housing application
    - Support community cohesion
    - Reduce anti-social behaviour or mitigate against it
    - Recognise local priorities
    - Support tenancy sustainability

- 1.4. Of the existing policies:
  - Seventy percent support reduction or mitigation of anti-social behaviour
  - Twenty percent restrict dog ownership in communal entrance flats
  - Ten percent prioritise applicants with an enhanced local connection to a designated location of council house new builds for the first let and subsequent 12 months of relets. After the 12-month period, all allocations are made in accordance with the City of Doncaster Council's main Housing Allocations Policy.
- 1.5. With the demand profile for social housing increasing, the review of these policies have been completed to establish if they are fit for purpose and have ongoing relevance in accordance with Part VI of the 1996 Housing Act.

## **EXEMPT REPORT**

2. No

## **RECOMMENDATIONS**

3. That Cabinet consider the outcomes of the review and consultation
- 3.1 That Cabinet consider the recommendations on policy changes set out in **Section 7**.
- 3.2 That Cabinet formally adopt the amended Local Lettings Policies set out in **Appendix A**.

## **WHAT DOES THIS MEAN FOR THE CITIZENS OF DONCASTER?**

4. This review sets out the revised and updated Local Lettings Policies operating outside of the Housing Allocations Policy in the allocation of council homes.
- 4.1 This review aims to ensure that these policies are fit for purpose, evidence based and subject to planned review to minimise the restriction of allocations outside of the Housing Allocations Policy. This is especially important given the current pressures on access to and supply of affordable housing.

## **BACKGROUND**

5. There are currently 10 policies in place, the majority of which were introduced following the additional flexibilities given in The Localism Act 2011.

- 5.1 Local Lettings Policies support housing management and strategic objectives by restricting or prioritising allocations for a certain area or scheme by excluding certain groups of people who have an active housing application. These additional criteria are outside of the Housing Applications Policy.
- 5.2 The aim and expected outcomes of the policy are:
- To support sustainable communities
  - To support housing management through reduction/mitigation of ASB
  - To enable local people to access quality affordable housing
  - To increase the number of council houses released to relet to those most in need through the prioritisation of older people under occupying a council house for new build bungalow or flat
  - Support tenancy sustainability and the wellbeing and independence of older tenants of council houses by giving them priority to access a new build bungalow or flat.
- 5.3 The operation of these policies continues to be labour intensive as they require manual intervention to confirm if the criteria is met at the point of offer. This is especially relevant to New Build Homes where bidding cannot be restricted based on the enhanced local connection rules which vary from scheme to scheme and result in a higher number of applicants being bypassed before we can identify those with the enhanced connection.

## OPTIONS CONSIDERED

- 6 Options considered were based on analysis of evidence and consideration of the vulnerability of tenants, as well as local knowledge.
- 6.1 The recommended options are outlined below.

## REASONS FOR RECOMMENDED OPTIONS

- 7 Each scheme is listed below with reasons for the recommendation made.
- 7.1 **The Crescent, Dunscroft – 53 houses – Review in 12 months and remove if lack of supporting evidence**  
This scheme has had a 493% increase in demand over a 4-year period with average bids increasing from 29 in 2017/18 to 172 in 2021/22. ASB cases are below the borough average and turnover of properties is stable over the same period ranging from 2 – 15%. A short-term review of 12 months was requested to enable focus on continuing trends given rises in ASB in the wider area with the agreement that the LLP be removed following the review if there is a lack of ongoing evidence.

7.2 **Highwoods Crescent, Mexborough – 30 flats and 9 bungalows – Removal**

This scheme has had a 271% increase in demand over a 4-year period with average bids increasing from 8 in 2017/18 to 29.7 in 2021/22, although this continues to be a small number of bids in comparison to flats in other areas. ASB cases are stable, although higher than the borough average. Turnover of properties fluctuates between 5 – 33%. All recognised the scheme is less desirable due to location, has less impact on the surrounding area due to location next to a main road and within a defined boundary. All supported removal of the Local Lettings Policy.

7.3 **Coniston Road, Mexborough – 22 flats – Retain**

Although this scheme has had a 206% increase in demand over a 4-year period with average bids increasing from 10 in 2017/18 to 20.6 in 2021/22, this continues to be a small number of bids in comparison to flats in other areas. ASB issues have remained at a high level and consistent. Turnover is high and fluctuates between 23 – 55% over this period and so continues to be problematic. This may be attributable to the block of flats being located amongst age-designated bungalows, close to a primary school and near a private housing development and the impact on vulnerable individuals living there. For these reasons, all supported to retain the Local Lettings Policy to continue to support housing management interventions.

7.4 **Auckland Road, Mexborough – 23 flats and 1 house – Retain**

Although this scheme had a 260% increase in demand over a 4-year period with average bids increasing from 10 in 2017/18 to 26 in 2021/22, this continues to be a small number of bids in comparison to flats in other areas. ASB issues have continued to be an issue with an escalation in cases in 2020/21. Turnover fluctuated between 12.5 – 21% over the same period. Letting continues to be problematic with properties requiring re-advert to be let. Any issues impact on residents due to the road layout and mixed tenure of the street. For these reasons, all supported to retain the Local Lettings Policy to continue to support housing management interventions.

7.5 **The Oval, Conisbrough – 83 flats and 22 bungalows – Retain**

This is an age designated scheme with priority given to those aged 60 and over. Although demand has increased by over 1000% with average bids increasing from 2.26 in 2017/18 to 14.18 in 2021/22, flats have continued to be re-advertised to relet them. ASB issues have escalated in 2021/22 and numbers of tenants joining the transfer list have also increased. Given the vulnerability of current residents and continuing issues, all supported to retain the Local Lettings Policy to continue to support housing management interventions.

7.6 **Silverwood House, Town Centre – 128 flats – Retain**

This is an age designated high rise scheme with priority given to those aged 60 and over located on the Balby Bridge estate which has a higher rate of



ASB in comparison with other areas. Although demand has increased by 413% with average bids increasing from 2.57 in 2017/18 to 13.18 in 2021/22, flats have only recently not required re-advert to relet them. Although ASB has remained stable, all supported to retain the Local Lettings Policy as were aware that its removal would negatively impact on vulnerable tenants within the scheme.

7.7 **No dogs Balby Bridge Estate – Remove**

All agreed that this should be effectively managed through the tenancy management process as the current Local Lettings Policy is not enforceable as tenants may acquire a dog(s) after sign up. Although most cases are resolved through proactive housing management, this has been fed into the Tenancy Agreement review to ensure that this is updated to reflect the responsibility of tenants to ensure that communal areas both inside and outside of flats remain clear of dog fouling.

7.8 **No dogs Wheatley Unity Flats and Intake – Remove**

As above, all agreed that this should be effectively managed through the tenancy management process as the current Local Lettings Policy is not enforceable may acquire a dog(s) after sign up. Although most cases are resolved through proactive housing management, this has been fed into the Tenancy Agreement review to ensure that this is updated to reflect the responsibility of tenants to ensure that communal areas both inside and outside of flats remain clear of dog fouling.

7.9 **Jubilee Court, Wheatley – 42 flats – Retain**






This is an age designated former sheltered scheme with small rooms and shared communal areas located within the Ennerdale bungalow estate. Demand has shown a slight increase of 21% with average bids increasing from 5.55 in 2017/18 to 6.71 in 2021/22, although properties continue to require re-advert to be let. ASB cases have also increased in 2021/22. For these reasons, all supported to retain the LLP especially given the vulnerabilities of current residents and those in the surrounding area.




7.10 **Park View, Adwick le Street – 48 flats – Retain**

This is an age designated low-level block of flats which was located adjacent to a sheltered scheme. The policy was introduced to mitigate ASB due to the vulnerability of residents and the nearby bungalow development. Demand has remained consistent, with average bids at 9.64. Re-adverts are still required to relet properties, mainly due to demand and the number of bungalows in surrounding areas. For these reasons and given the vulnerabilities of current residents, all supported to retain the Local Lettings Policy.

## IMPACT ON THE COUNCIL'S KEY OUTCOMES

8

Great 8 Priority	Positive Overall	Mix of Positive & Negative	Trade-offs to consider – Negative overall	Neutral or No implications
 <b>Tackling Climate Change</b>				✓
 <b>Developing the skills to thrive in life and in work</b>				✓
 <b>Making Doncaster the best place to do business and create good jobs</b>				✓
 <b>Building opportunities for healthier, happier and longer lives for all</b>	✓			
<ul style="list-style-type: none"> <li>• Supporting sustainable communities in specific areas by restricting new housing allocations to support housing management interventions to reduce and/or mitigate anti-social behaviour</li> <li>• Supporting people in accessing suitable housing within their communities by giving enhanced priority for new build council homes at the first point of allocation and for the following 12 months</li> </ul>				
 <b>Creating safer, stronger, greener and cleaner</b>	✓			

<b>communities where everyone belongs</b>				
<ul style="list-style-type: none"> <li>• Allocating homes fairly and consistently in accordance with legal frameworks</li> <li>• Working with partners to ensure that allocations are appropriate and sustainable and support housing management</li> <li>• Being clear on restrictions on housing allocations outside of the main housing allocations policy</li> </ul>				
 <b>Nurturing a child and family-friendly borough</b>	<input checked="" type="checkbox"/>			
<ul style="list-style-type: none"> <li>• Supporting people in accessing suitable housing within their communities to maintain family support networks and/or employment links by giving enhanced priority for new build council homes at the first point of allocation and within the following 12 months</li> </ul>				
 <b>Building Transport and digital connections fit for the future</b>				<input checked="" type="checkbox"/>
 <b>Promoting the borough and its cultural, sporting, and heritage opportunities</b>				<input checked="" type="checkbox"/>
<b>Fair &amp; Inclusive (there is no logo for this)</b>	<input checked="" type="checkbox"/>			
<ul style="list-style-type: none"> <li>• Operating legally compliant policies</li> <li>• Transparency in the allocation process</li> <li>• Subject to the right to review</li> </ul>				

## Legal Implications [Officer Initials: NC, Date: 13/03/2023]

- 9 Section 166A of the Housing Act 1996 requires that every Local Housing Authority must have an allocations policy for determining priorities between people who qualify for an allocation of housing and the procedure to be followed. Local Authority Housing Allocations Policies must be legally compliant with Part VI of the Housing Act 1996, and statutory guidance issued by the Secretary of State. The current Allocation of accommodation: guidance for local housing authorities in England (“the statutory guidance”) was published in June 2012 and updated in January 2023.
- 9.1 In determining priorities, an allocation policy must secure reasonable preference for the following categories of people:
- Homeless persons, or person threatened with homelessness;
  - Persons occupying insanitary or overcrowding housing or otherwise living in unsatisfactory housing conditions;
  - Persons who need to move on medical or welfare grounds; and
  - Persons who need to move to a particular locality within the local authority’s area and a failure to meet that need would cause hardship to themselves or others
- 9.2 The Statutory Guidance confirms that section 166A(6)(b) of the Housing Act 1996, gives the Council the flexibility to allocate accommodation to people of a particular description, whether they fall within the reasonable preference categories, provided that overall priority is given to people in the reasonable preference categories. This is the statutory basis for local lettings policies which may be used to achieve a wide variety of housing management and policy objectives such as those set out earlier in this report.
- 9.3 In considering the proposals contained within this report, elected members are also reminded of their obligations under section 149 Equality Act 2010. This section contains the Public Sector Equality Duty (PSED), which obliges public authorities, when exercising their functions, to have ‘due regard’ to the need to:
- a) Eliminate discrimination, harassment and victimisation and other conduct which the Act prohibits;
  - b) Advance equality of opportunity between people who share relevant protected characteristics and those who do not; and
  - c) Foster good relations between people who share relevant protected characteristics and those who do not
- 9.4 Protected characteristics are age, disability, race, sex, sexual orientation, gender reassignment, religion or belief, pregnancy, and maternity. Only the first aim of the PSED set out in paragraph 12 above applies to a further protected characteristic of marriage and civil partnership. In addition to the statutory protected characteristics referred to above, the Council has

chosen to adopt further non-statutory local protected characteristics of socio-economic status (poverty), Veterans and homeless and rough sleepers.

- 9.5 Having due regard to advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
  - Taking steps to meet the needs of people from protected groups where they are different to the needs of other people; and
  - Encouraging people from protected groups to participate in public life or in other activities where their participation in disproportionality low
- 9.6 Elected members must consciously consider and have due regard to the three aims of the general equality duty when dealing with the recommendations contained within this report. A completed due regard statement has been produced and appended to this report to assist elected members in this regard.

#### **Financial Implications [Officer Initials: NF | Date: 22/03/2023]**

- 10 An effective Allocations Policy will contribute positively to robust budgetary control and to meeting Key Performance Indicator (KPI) targets.
- 10.1 In terms of budgets, SLHD manage the Choice Based Lettings (CBL) service at a budgeted cost of £0.9m per year, out of the wider total Housing Management and Customer Services budget of £10m. Almost all of this £0.9m is employee related costs. SLHD receives a Housing Revenue Account (HRA) management fee to deliver these CBL and other housing services. SLHD also receives a Management Fee from the General Fund of £2.1m, together with other forms of income totally £1.1m, to deliver the Housing Options service at a budgeted cost of £3.2m per year.
- 10.2 In addition, minimising the period a property is empty will reduce the Void Rent Loss cost to the HRA, which is budgeted at £0.98m per year.
- 10.3 In turn, this will have a positive impact on a number of SLHD managed KPIs, notably Void Rent Loss, Average Void Re-let times, Tenancy Sustainability, Anti-Social Behaviour (ASB) and tenant satisfaction.

#### **Human Resources Implications [Officer Initials: KJ | Date: 22/03/2023]**

- 11 There are no HR implications associated with this report.

## **Technology Implications [Officer Initials: PW | Date: 16/03/2023]**

- 12 There are no technology implications in relation to this report. The author has confirmed that the criteria of the policies cannot be applied to the housing application form as they are too time sensitive and complex so therefore require additional manual processing to determine.

## **RISKS AND ASSUMPTIONS**

- 13 There is potential for legal challenge against any aspect of the policies by an individual or organisation. All applicants bypassed as not meeting the criteria have the right to request a review within 28 days of the decision being made. In terms of the recommendations made the review is mitigation but no guarantee that a challenge will not be made. As accommodation becomes scarcer, the potential for challenge increases.
- 13.1 Legal services have provided advice and guidance through the review as further mitigation against a successful challenge.

## **CONSULTATION PROCESS**

- 14 A consultation exercise was undertaken with elected members from relevant wards, City of Doncaster Council Locality Teams, including partner organisations, Strategic Housing and SLHD, and an additional cross ward focus group on New Build Council Homes including those representing wards with arising developments. These meetings were led by the SLHD Access and Allocations Service Manager.
- 14.1 Twenty elected members participated in the consultation through attending meetings or giving feedback.
- 14.2 The structure of the consultation consisted of:
- A newsletter giving details of the policies, schemes consultation and decision-making process
  - Presentations on each scheme including number of properties, current restrictions, turnover of properties, average number of bids, housing management cases by type and level and local intelligence
  - Additional meetings to accommodate member's commitments
  - Several updates to the Housing Portfolio Holder
  - Reports to SLHD EMT for input and feedback on the process
  - A further update newsletter circulated to all members in February 2023 giving updates on the consultation outcomes

## CONSULTATION OUTCOMES

- 15 Key outcomes of the consultation were:
- 30% of the Local Lettings Policies were supported as no longer relevant
  - 10% are subject to a 12-month interim review and removal should there continue to be low tenancy management issues and turnover
  - The request for one additional policy was not pursued following lack of supporting evidence
  - An amendment was supported for New Build Council Homes to give current council house tenants with the enhanced local connection priority for new build bungalows and age designated flats. This will free up council houses to relet to those most in need and align to the objectives of the overarching Housing Allocations Policy review
  - All updated and amended policies can be found in **Appendix A**

## DUE REGARD STATEMENT

- 16 A Due Regard Statement have been completed is in **Appendix B**. The statement also considers alternative stock that is not subject to these restrictions.
- 16.1 After consideration there are three potential positive impacts, seven neutral impacts and four negative impacts. The negative impacts are reduced due to the limited amount of stock subject to the additional criteria of the policies and also additional schemes we have in place to facilitate access to housing.
- 16.2 Any unforeseen adverse impacts will be identified through monitoring processes and statistical/data analyses.

## **APPENDICES**

- A** Updated Local Lettings Policies
- B** Due Regard Statement
- C** Monitoring Matrix

## **BACKGROUND PAPERS**

- None

## **GLOSSARY OF ACRONYMS AND ABBREVIATIONS**

- SLHD St Leger Homes of Doncaster
- EMT Executive Management Team

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## **Appendix A: Updated Local Lettings Policies**

This appendix includes the updated policies for the retained Local Lettings Policies. These are:

1. The Crescent, Dunscroft
2. Coniston Road, Mexborough
3. Auckland Road, Mexborough
4. The Oval, Conisbrough
5. Silverwood House, Balby Bridge Estate, Town Centre
6. Jubilee Court, Wheatley
7. Park View, Adwick Le Street
8. New Build Council Homes

## The Crescent, Dunscroft

### **Background**

The Crescent, Dunscroft is a street of 53 houses with historic anti-social behaviour.

### **Local Lettings Policy Criteria**

Where an applicant meets one or more of the following criteria, they will be excluded and not offered a tenancy in the scheme for a period of at least 2 years where the applicant:

- Is known to have been involved in anti-social behaviour within the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months
- Has an unspent criminal conviction
- Has been convicted of, or has been held responsible for criminal damage or arson within the last 12 months
- Has a history of chaotic behaviour
- Has a drug or alcohol use associated with anti-social behaviour and is not on a treatment programme. (Consideration will be given to individuals who have an alcohol / drug problem and are actively engaging in a rehabilitation treatment programme).

Bypassed applicants will have the right to review the decision under the existing review terms of the overarching Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories provided that overall the authority is able to demonstrate compliance with the requirements of section 166A(3).

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings Policy will cover 100% of relets in The Crescent, Dunscroft.

### **Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

## Coniston Road, Mexborough

### **Background**

Coniston Road flats, Mexborough is a development of 22 flats located on a main bus route adjacent to a large number of council bungalows, a primary school and private housing. A local lettings policy has been in place since 2012 to reduce the likelihood of anti-social behaviour from new tenants by applying the criteria below.

### **Local Lettings Policy Criteria**

An exclusion criteria is implemented as follows:

Where the applicant meets one of the following criteria they will be bypassed and not offered a tenancy in the scheme for a period of at least 2 years if the applicant or member of their household:

- Is known to have been involved in anti-social behaviour within the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months
- Has an unspent criminal conviction
- Has been convicted of, or has been held responsible for, criminal damage or arson within the last 12 months.
- Has a history of chaotic behaviour
- Has a drug or alcohol use or is on a rehabilitation programme

Bypassed applicants will have the right to review the decision under the existing review terms of the overarching Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories provided that overall the authority is able to demonstrate compliance with the requirements of section 166A(3).

The proposed Local Lettings Policy covers 100% of the flats within the scheme. Although there is an existing Local Lettings Policy on flats at Auckland Road Mexborough with the same criteria, there is sufficient alternative flat accommodation within the Mexborough area, to ensure that no applicant would be disadvantaged by being refused accommodation.

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings policy will cover 100% of relets on Coniston Road, Mexborough.

### **Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

## Auckland Road, Mexborough

### **Background**

Auckland Road, Mexborough is a street including 25 general needs flats, 1 of which is a leasehold property, 1 council house and a remaining development of privately owned family housing. The focus of the Local Lettings Policy is to reduce the likelihood of anti-social behaviour from new tenants by applying the criteria below.

### **Local Lettings Policy Criteria**

An exclusion criteria is implemented as follows:

Where the applicant meets one of the following criteria they will be bypassed and not offered a tenancy in the scheme for a period of at least 2 years if the applicant or member of their household:

- Is known to have been involved in anti-social behaviour within the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months
- Has an unspent criminal conviction  
Has been convicted of, or has been held responsible for, criminal damage or arson within the last 12 months
- Has a history of chaotic behaviour
- Has a drug or alcohol use or is on a rehabilitation programme

Bypassed applicants will have the right to review the decision under the existing review terms of the overarching Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories provided that overall the authority is able to demonstrate compliance with the requirements of section 166A(3).

The proposed Local Lettings Policy covers 100% of the 24 flats within the scheme. Although there is an existing Local Lettings Policy on flats at Coniston Road, Mexborough with the same criteria, there is sufficient alternative flat accommodation within the Mexborough area, to ensure that no applicant would be disadvantaged by being refused accommodation on Auckland Road.

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings Policy will cover 100% of relets on Auckland Road, Mexborough.

### **Will the Local Lettings Policy be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned review from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

## The Oval, Conisbrough

### **Background**

The Local Lettings policy covers the 83 flats and 22 bungalows within the scheme.

### **Local Lettings Policy Criteria**

Properties in the scheme will be subject to the following criteria:

- Minimum age designation of 40+
- Priority given to those aged 60 and over in accordance with Doncaster Council's Housing Allocations Policy

An additional exclusion criteria is implemented as follows:

Where the applicant meets one of the following criteria they will be bypassed and not offered a tenancy in the scheme for a period of at least two years if the applicant:

- Is known to have been involved in anti-social behaviour within the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months
- Has an unspent criminal conviction
- Has been convicted of, or has been held responsible for, criminal damage or arson within the last 12 months
- Has a history of chaotic behaviour
- Has a drug or alcohol use or is on a rehabilitation programme

Bypassed applicants will have the right to review the decision under the existing review terms of the Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories provided that overall the authority is able to demonstrate compliance with the requirements of section 166A(3).

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings Policy will cover 100% of relets in The Oval, Conisbrough.

### **Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

## Silverwood House, Balby Bridge Estate, Town Centre

### **Background**

Silverwood House is a high rise block of 128 flats over 16 floors, located on the Balby Bridge Estate in the Town Centre. It is age designated to applicants aged 50 and over. 30 of the flats are 1 bedroomed, with the remaining 99 flats 2 bedrooms.

Silverwood House is one of the only two age designated blocks on the Balby Bridge Estate in an area of high density flats and intensive housing management provided by an estate based team.

The focus of the Local Lettings Policy is to reduce the likelihood of anti-social behaviour from new tenants by applying the criteria below.

### **Local Lettings Policy Criteria**

- Applicants and any household members to be aged 50 years and over
- Priority given to those age 60 and over in accordance with Doncaster Council's Housing Allocations Policy
- No involvement or history of anti-social behaviour
- No drug or alcohol abuse and not on a rehabilitation programme

Bypassed applicants will have the right to review the decision under the existing review terms of the overarching Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories provided that overall the authority is able to demonstrate compliance with the requirements of section 166A (3).

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings Policy will cover 100% of relets in Silverwood House.

### **Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

## Jubilee Court, Wheatley

### **Background**

Jubilee Court Wheatley is a previously enclosed sheltered senior citizen scheme comprising of 42 units of accommodation. The scheme comprises of 17 bedsits and 24 one bedroom flats and 1 three bed maisonette.

As part of the sheltered housing review the age designation was changed to 45 years and over, although applicants aged 60 and over are prioritised in accordance with the terms of Doncaster Council's Housing Allocations Policy.

### **Local Lettings Policy Criteria**

- Single households only
- No pets
- Priority will be given to applicants aged 60 and over first and then remaining applicants in accordance with the overarching Housing Allocations Policy.

Where the applicant meets one of the following criteria they will be bypassed and not offered a tenancy in the scheme for a period of at least 2 years if the applicant or member of their household:

- Is known to have been involved in anti-social behaviour within the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months
- Has an unspent criminal conviction
- Has been convicted of, or has been held responsible for criminal damage or arson within the last 12 months
- Has a history of chaotic behaviour
- Has a drug or alcohol use or is on a rehabilitation programme

Bypassed applicants will have the right to review the decision under the existing review terms of the overarching Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories provided that overall the authority is able to demonstrate compliance with the requirements of section 166A(3).

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings Policy will cover 100% of relets in Jubilee Court, Wheatley.

### **Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

## Park View, Adwick Le Street

### **Background**

Park View, Adwick Le Street is a block of 48 self-contained flats designated as senior citizens accommodation. In 2013, as part of the sheltered housing review in which Park View was included, the age designation was changed to 45+.

### **Local Lettings Policy Criteria**

- Single households only
- No pets
- Priority will be given to applicants aged 60 and over first and then to remaining applicants in accordance with the overarching Housing Allocations Policy

Where the applicant meets one of the following criteria they will be bypassed and not offered a tenancy in the scheme for a period of at least 2 years if the applicant or member of their household:

- Is known to have been involved in anti-social behaviour within the last 2 years
- Is unable to demonstrate an ability to sustain a tenancy for a minimum period of the last 12 months
- Has an unspent criminal conviction
- Has been convicted of, or has been held responsible for criminal damage or arson within the last 12 months
- Has a history of chaotic behaviour
- Has a drug or alcohol use or is on a rehabilitation programme

Bypassed applicants will have the right to review the decision under the existing review terms of the overarching Housing Allocations Policy. Section 166A of the Housing Act 1996, as amended, enables local housing authorities to allocate particular accommodation to people of a particular description whether or not they fall within the reasonable preference categories. Provided that overall the authority is able to demonstrate compliance with the requirements of section 166A (3).

### **How many allocations will be affected by the Local Lettings Policy?**

The Local Lettings Policy will cover 100% of relets in Park View, Adwick Le Street.

### **Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

### **How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)



## New Build Council Homes

An enhanced local connection criteria to the specific areas defined in each development will be applied to up to 100% of the new build council homes for the first let or if the home becomes available within 12 months of the completion date.

This does not apply to adapted properties to ensure best use of this type of accommodation where priority will be given to applicants nominated from Doncaster Council's Accessible Housing Register.

The initial boundaries of the Schemes are set at the actual village dependent on the size of the area or the defined ward.

The enhanced local connection criteria will include:

- Living within the defined geographical boundary where the new build homes are located (time period 3 years)
- In paid work in the defined boundary (time period 3 years)
- Has a close family member living in the defined boundary (time period 3 years) – civil partners, parents, grandparents, sons, daughters, brothers or sisters
- Can demonstrate a strong local connection having lived in the area for five years e.g. lived in the area as a child and then moved away

This is with the exception of applicants in the General Band, who will continue to be considered after residents in all other bands in accordance with DMBC's Housing Allocations Policy.

In the case of allocating new build bungalows or flats:

- Council tenants releasing a house to relet, with the enhanced local connection will be considered before other applicants meeting the enhanced criteria.

Should applicants with the enhanced local connection be exhausted, any remaining offers will be made in accordance with the shortlisting priority of the overarching Housing Allocations Policy.

An example of the priority criteria applied is shown below.

### **Agreed Local Connection Criteria**

**Priority 1** Applicants who have a Local Connection to Edenthorpe and Kirk Sandall.

**Priority 2** If there are no applicants/ or the shortlist is exhausted on **Priority 1** the scheme will be extended to applicants with a Local Connection to Clay Lane and Barnby Dun.

**Priority 3** If there are no applicants/or the shortlist is exhausted on **Priority 2** the scheme will be extended to applicants with a Local Connection to Armthorpe, Dunscroft and Dunsville.

**Priority 4** If there are no applicants in **Priority 3** the scheme will be allocated to applicants in order of their shortlisted position.

Areas will be discussed and agreed with the Housing Portfolio Holder and SLHD Director of Housing and Customer Services and ward boundaries will be applied.

**Will the Local Lettings Policies be reviewed?**

Yes, there is a review matrix attached in Appendix C with planned reviews from 12 months to 3 years.

**How will the policy be advertised?**

Any arising vacancies will be clearly advertised as subject to a Local Lettings Policy. The terms and conditions of the policy will be published on the Doncaster HomeChoice website at [www.stlegerhomes.co.uk/looking-for-a-home/](http://www.stlegerhomes.co.uk/looking-for-a-home/)

# **EQUALITY, DIVERSITY AND INCLUSION**

## **CITY OF DONCASTER COUNCIL**

### **Due Regard Statement Template**

How to show due regard to the equality duty in how we develop our work and in our decision-making.

## **Due Regard Statement**

A **Due Regard Statement** (DRS) is the tool for capturing the evidence to demonstrate that due regard has been shown when the council plans and delivers its functions. A Due Regard Statement must be completed for all programmes, projects and changes to service delivery.

- A DRS should be initiated at the beginning of the programme, project or change to inform project planning
- The DRS runs adjacent to the programme, project or change and is reviewed and completed at the relevant points
- Any reports produced needs to reference “Due Regard” in the main body of the report and the DRS should be attached as an appendix
- The DRS cannot be fully completed until the programme, project or change is delivered.

<p><b>1 Name of the 'policy' and briefly describe the activity being considered including aims and expected outcomes. This will help to determine how relevant the 'policy' is to equality.</b></p>	<p>Local Lettings Policies support housing management and strategic objectives by restricting or prioritising allocations for a certain area or scheme by excluding certain groups of people who have an active housing application. These additional criteria are outside of the Housing Allocations Policy. Following this review the policies being proposed for retention are listed below.</p> <ol style="list-style-type: none"> <li><b>1. The Crescent Duncroft - 53 houses</b></li> <li><b>2. Coniston Road Mexborough - 22 flats</b></li> <li><b>3. Auckland Road Mexborough - 23 flats and 1 house</b></li> <li><b>4. The Oval Conisbrough - 83 flats and 22 bungalows</b></li> <li><b>5. Silverwood House Town Centre - 128 flats</b></li> <li><b>6. Jubilee Court Wheatley - 42 flats</b></li> <li><b>7. Park View Adwick le Street - 48 flats</b></li> <li><b>8. New build Council Homes (listed in section 5)</b></li> </ol> <p>The first 7 schemes listed have Local Lettings Policies to mitigate and reduce potential ASB (Anti-Social Behaviour) on allocation of relets. This is to support housing management interventions and vulnerable residents within the schemes and surrounding areas. The 7 schemes represent 422 units of accommodation from a total stock of c. 20,000 units of accommodation.</p> <p>The 8<sup>th</sup> scheme applies to New Build Council Homes on the initial let and following 12 months, after which they will be let in accordance with the rules set out in the City of Doncaster Council's Housing Allocations Policy. The Local Lettings Policy gives additional priority to applicants with an enhanced local connection to designated areas of each new build scheme. Local connection criteria includes residence, employment or direct family members living in the designated areas for 3 years or more. Following the review, it is proposed that additional priority will also be given to council tenants under occupying houses wishing to downsize to an age-designated bungalow or flat who have the enhanced local connection. This excludes adapted accommodation, which is let through</p>
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		<p>nomination from the City of Doncaster Council's Housing Register to ensure best use of this limited stock and is to incentivise the release of council houses to relet. The policies have been in place since 2013/14 as confirmed in Appendix A and have been reviewed in 2022/23 with members, Strategic Housing, SLHD and locality meetings including partners with an overview of the schemes and wider area. This followed the review of the City of Doncaster Council's Housing Allocations Policy where there is provision in the policy for Local Lettings Policies.</p> <p>The aim and expected outcomes of the policies are:</p> <ul style="list-style-type: none"> <li>• To support sustainable communities</li> <li>• To support housing management through reduction/mitigation of ASB</li> <li>• To enable local people to access quality affordable housing</li> <li>• To increase the number of council houses released to relet to those most in need through the prioritisation of older people under occupying a council house for new build bungalow or flat</li> <li>• Support tenancy sustainability and the wellbeing and independence of older tenants of council houses by giving them priority to access a new build bungalow or flat</li> </ul>
2	<p><b>Service area responsible for completing this statement.</b></p>	<p>St Leger Homes of Doncaster Housing Services Access to Homes</p> <p>St Leger Homes of Doncaster Equality &amp; Diversity Manager</p>
3	<p><b>Summary of the information considered across the protected groups.</b></p> <p><b>Service users/residents</b></p>	<p><b>Age</b>  <b>46.2% of customers are aged 55 and over.</b>  Age restrictions are applied by property type for older person's accommodation. None of the LLP properties with a minimum age restriction were previously general needs accommodation and the minimum required age has been reduced potentially increasing access to younger people dependent on demand. However, it is important to note that underage applicants with an assessed medical need are eligible to be considered and are included in the City of Doncaster Council's Accessible Housing Register and are eligible to bid on certain properties to meet their medical rehousing needs. These policies</p>

<p><b>Doncaster Workforce</b></p>	<p>consistently apply the same eligibility rules to property type and size as the overarching Housing Allocations Policy. There are both <b>negative</b> and <b>positive</b> impacts according to access to accommodation based on these criteria, but the negative impacts are mitigated by the fact that underage applicants with assessed medical needs remain eligible.</p> <p><b>Disability</b>  <b>21.2% of customers have a disability.</b>  The Local Lettings Policies do not apply to new build adapted units where disabled applicants on the City of Doncaster Council's Accessible Housing Register and those assessed as needing an adapted property through the medical assessment process are prioritised for these units based on need. This is to ensure best use of stock and enables properties to be planned for specific households where there is a lack of existing stock available. The additional schemes listed do not have any purpose built or extensively adapted properties. The impact on disabled applicants is <b>positive</b>.</p> <p><b>Race</b>  <b>3.98% of customers are from ethnic minority backgrounds.</b>  There are no criteria in this policy that have regard to race. Although recently settled applicants may not meet the local lettings criteria of 3 years for new build homes. This also applies to Homeless families with a local connection of less than 3 years and other groups within the local connection exemptions. The impact is mitigated due to the low number of new builds in comparison to other relets available. Therefore, the impact is <b>neutral</b>.</p> <p><b>Sex</b>  <b>37.9% told us they were male. 61.9% female, and 0.2% other.</b>  There are no criteria in this policy that have regard to sex. Therefore, the impact is <b>neutral</b>.</p>
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	<p><b>Sexual Orientation</b> <b>66% of customers are heterosexual, 0.85% are LGBTQ+ and the remainder have not answered.</b> There are no criteria in this policy that have regard to sexual orientation. Therefore, the impact is <b>neutral</b>.</p> <p><b>Religion and Belief</b> <b>15,003 customers told us they follow a religion or belief.</b> There are no criteria in this policy that have regard to religion or belief. Therefore, the impact is <b>neutral</b>.</p> <p><b>Maternity and Pregnancy</b> <b>We do not collect this data.</b> There are no criteria in this policy that have regard to maternity or pregnancy. The property eligibility rules mirror that of the City of Doncaster Council's Housing Allocations Policy. Therefore, the impact is <b>neutral</b>.</p> <p><b>Gender Reassignment</b> <b>0.01% of customers told us they were transgender.</b> There are no criteria in this policy that have regard to gender reassignment. Therefore, the impact is <b>neutral</b>.</p> <p><b>Marriage and Civil Partnership</b> <b>We do not collect this data.</b> There are no criteria in this policy that have regard to marriage and civil partnership. Therefore, the impact is <b>neutral</b>.</p>
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*Additional criteria outside of the protected characteristics:***Socio-Economic Status**

There are no criteria in this policy related to income. The new build policy includes place of employment within the enhanced local connection to support people in accessing their place of work. Therefore, the impact is **positive**.

**Armed Forces Veterans**

There are no criteria in this policy related to veterans. Applicants are bypassed if they do not meet the additional criteria of each policy. Where a new build enhanced local connection criteria applies, we are flexible and will consider where someone has grown up in the area as well as family/residence and employment.

Therefore, the impact is only **negative** for those not meeting the criteria although this is mitigated by the extremely low numbers of properties subject to Local Lettings Policies in comparison to other relets reduces the impact to this group.

**Homelessness and Rough Sleepers**

Applicants are bypassed if they do not meet the additional criteria of each policy.

Therefore, the impact of the Local Lettings Policies is dependent on the applicant's circumstances. Should they not meet the criteria they have the right to request and submit any further information to be considered. The impact is **negative** although this is mitigated by the extremely low numbers of properties subject to Local Lettings Policies in comparison to other relets reduces the impact on this group. 2% of properties are subject to the ASB Local Lettings Policies and New Build Homes are 1 : 25.24 relets. It is important to note that these properties are not supported housing which for some would be more appropriate accommodation where additional support is required before moving into independent living.

**Care Leavers**

Applicants are bypassed if they do not meet the additional criteria of each policy.

Therefore, the impact of the Local Lettings Policies is dependent on the applicant's circumstances. We have an additional direct match scheme for care leavers of up to 20

		<p>units a year as well as a shared accommodation model. After reviewing the applicants on Direct Match and from experience of allocating to this group there is no demand from this group for the schemes covered by Local Lettings Policies, due to the ASB issues. Where a new build enhanced local connection criteria applies, we are flexible and will consider a connection as being a foster placement as well as family/residence and employment. We do also consider people who grew up in the area who may not have an existing connection, as long as we can establish this through Revenue records that we have access to. Therefore, the impact is only <b>negative</b> for those not meeting the criteria although this is mitigated by the extremely low numbers of properties subject to Local Lettings Policies in comparison to other relets reduces the impact to this group and by the additional schemes we in place to facilitate access to housing.</p>
<p><b>4</b></p>	<p><b>Summary of the consultation/engagement activities</b></p>	<p>Consultation has been with the following groups:</p> <ul style="list-style-type: none"> <li>• SLHD Housing Management</li> <li>• Doncaster Council Strategic Housing /Local Investment Planning</li> <li>• SLHD Executive Management Team</li> <li>• Elected members from cross area wards including those who have new build schemes currently being delivered</li> </ul>
<p><b>5</b></p>	<p><b>Real Consideration:</b></p> <p><b>Summary of what the evidence shows and how has it been used</b></p>	<p>SLHD produce a yearly Equality, Diversity and Inclusion (EDI) report, which includes a profile of the Housing Register and Housing Allocations relating to Equality and Diversity. Some data from that report on the Waiting List of prospective customers includes:</p> <ul style="list-style-type: none"> <li>• 1,433 applications from ethnic minorities</li> <li>• 2,814 applicants told us they have a disability</li> <li>• 224 applicants told us that they were LGBTQ+, while 7,217 said they were heterosexual</li> <li>• 5,577 applicants are female, 3,329 are male and 11 are transgender</li> </ul> <p>This policy has been in place since the Council New Build Programme began in 2013/14.</p>

Since then, 480 New Build units have been delivered up to and including 2021/22. From 2015/16 to 2021/22, when we have comparable data, we have relet 9,845 properties and had 390 New Build Council Homes. Therefore, over the period the ratio of relets to new builds in 25.24 : 1.

Delivery	13/14	14/15	15/16	16/17	17/18	18/19	19/20	20/21	21/22	Total
Council New Build Start on Site	33	57	104	129	124	0	0	0	33	480 Ex 13/14 and 14/15 <b>390</b>
Number of Voids Relet	N/A	N/A	1673	1483	1505	1447	1386	1217	1134	<b>9845</b>

In Phase 2 of the 2020-2025 programme there are 123 units across 7 sites, 25 of which have recently secured planning permission (15<sup>th</sup> November 2022) and 4 secured planning permission on 7<sup>th</sup> March 2023, with 1 remaining site left to secure Planning Permission in the future. All start on site dates will be after April 2023. The 7 sites are within the North, Central South and West areas of the Borough so are not concentrated in one area.

Phase 3 of the 2020-2025 programme is subject to confirmation that sites are suitable and all of the sites and the number of units per site, so at present we cannot provide exact details. With an expectation to submit planning applications for Phase 3 sites during 2023

		<p>with start on site in 2024. The current indicative total is around 750 units, but this will change following site appraisal. Again, potential sites are spread across the Borough.</p> <p>Therefore, given the ratio of relet to new build is 25.24 : 1 as such, the majority of allocations are not subject to this policy and applicants are able to be considered for other vacancies within each area.</p>
<b>6</b>	<b>Decision Making</b>	The decision-making report includes a section on the due regard statement and the legal obligations we are under in having regard to the content of this statement as part of the decision-making process.
<b>7</b>	<b>Monitoring and Review</b>	As part of the review there is a planned review matrix, where outcomes and relevance will be reviewed to ensure that ongoing policies are legally compliant and fit for purpose.
<b>8</b>	<b>Sign off and approval for publication</b>	<ul style="list-style-type: none"> <li>• <i>By signing this statement off as complete you are confirming that ‘you’ have examined sufficient information across all the protected groups and used that information to show due regard to the three aims of the general duty. This has informed the development of the activity.</i></li> <li>• <i>If this statement accompanies cabinet paper it will be published as part of, the cabinet report publication process. Statements accompanying cabinet reports are also published on our website. If this statement is not to be submitted with a cabinet paper, please maintain a copy for your own records that can be retrieved for internal review and in case of future challenge.</i></li> </ul>

## Appendix C: Monitoring Matrix

No	Date Implemented	Date Last Reviewed	Next Review (12 months - 3 years)	Scheme	Area	Age Designated	No. of Units	Aim of the LLP
1	2011	2022/23	Sept 2024	The Crescent, Dunscroft	East	N/A	53 houses	Reduce ASB
2	2012	2022/23	Jan 2026	Coniston Road, Mexborough	West	N/A	22 flats	Reduce ASB
3	2014	2022/23	Jan 2026	Auckland Road, Mexborough	West	N/A	24 flats and 1 house	Reduce ASB
4	2014	2022/23	Sept 2026	The Oval, Conisbrough	West	40	83 flats and 22 bungalows	Reduce ASB
5	2013	2022/23	June 2026	Silverwood House	Central	50+	128 flats	Reduce ASB
6	2014	2022/23	May 2026	Jubilee Court, Wheatley	Central	45+	42 flats	Former sheltered scheme - support community cohesion to avoid ASB
7	2014	2022/23	May 2026	Park View, Adwick le Street	North	45+	48 flats	Former sheltered scheme - support community cohesion to avoid ASB
8	2014	2022/23	Oct 2026	New Build Council Homes	All			Enhanced local connection criteria on initial let and any relet (excluding adapted properties) within 12 month based on residence, family connection or employment. Council tenants of houses with the enhanced local connection awarded additional priority for bungalows or age-designated when releasing a house to relet

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**City of  
Doncaster  
Council**

## Report

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**Date: 16<sup>th</sup> August 2023**

**To: The Mayor and Cabinet**

**Report Title: Accessible Housing Register – Review of Policy**

<b>Relevant Member(s)</b>	<b>Cabinet</b>	<b>Wards Affected</b>	<b>Key Decision?</b>
Councillor Glyn Jones Councillor Sarah Smith		All	Yes

### **EXECUTIVE SUMMARY**

1. The Accessible Housing Register lists properties that may be allocated to meet the needs of people with disabilities or health issues that could not be met by housing that is appropriate for the majority of the population with general needs.
2. This report sets out the significant issues that Doncaster people face within the current policy that governs usage of the Accessible Housing Register. The report sets out proposed changes and explains how these have been consulted upon.

### **EXEMPT REPORT**

3. Not applicable.

### **RECOMMENDATIONS**

4. To approve the amended Accessible Housing Register policy attached as Appendix A, noting prior consultation with Doncaster people who could potentially be affected.

### **WHAT DOES THIS MEAN FOR THE CITIZENS OF DONCASTER?**

5. The accessible housing needs of Doncaster people will be met more quickly, whether this is via aids and adaptations that support their existing property or, where this is necessary, to a more suitable property. Satisfaction for Doncaster residents will increase. Doncaster residents will benefit from better use of resources, with less time spent on bureaucracy and more on helping people.

## BACKGROUND

6. The Council is legally required to have a policy which sets out how it will allocate its limited housing stock to applicants. The Council has an overarching allocations policy covering the bulk of the housing stock and that policy was reviewed and approved in 2022. The Council also has an Accessible Housing Register Policy that governs the assessment and allocation of significantly adapted properties in the context of the mains allocations policy.
7. The current Accessible Housing Register policy has a number of significant flaws that result in long waits and poor satisfaction for many Doncaster people and also inefficiency in the usage of available housing.
  - Too many properties are contained within the Accessible Housing Register, even those with relatively minor degrees of adaptation.
  - This drags too many people into AHR rehousing applications when actually their needs could either be met by adaptations to existing properties or by a move into appropriate general needs housing.
  - This in turn compounds complication and delays for people who undeniably need to move to a much more significantly adapted and accessible property.
  - Within the process itself there is too much bureaucracy both for Doncaster people and professionals to negotiate
  - Delays are problematic for everybody but especially affect situations with a degree of urgency, for example people waiting to leave hospital
  - There is inconsistency between the approach to allocating properties on the Accessible Housing Register and the Allocations Policy for general needs housing.
8. Assessment from Council occupational therapists has been a key part of the above process. Until recently delays in occupational therapy assessments compounded problems with the Accessible Housing Register. However this has now been addressed via a hugely improved way of working within the occupational therapy service. From a peak of 350 people on a waiting list for occupational therapy assessment, the waiting list as at 31<sup>st</sup> July 2023 is zero. This provides a strong foundation to make further improvements.
9. Proposals to change the Accessible Housing Register policy will have real implications for local people. Therefore consultation is essential to ensure that the Council understands support for proposed changes, reasons for any opposition and any unforeseen consequences. Consultation has been carried out with people who stood to be affected by any change in policy. This is attached as Appendix B.
10. The following proposed amendments were consulted upon:
  - To change the definition of an adapted property to only include significantly adapted and accessible properties on the register that are wheelchair accessible have specialist equipment in place or have been specifically adapted.



- To reduce the number of applicants on the AHR to those with specialist needs for majorly adapted properties, whilst enabling others to bid for properties sooner without the need in most cases for an Occupational Therapy Assessment
- To simplify the assessment process (we will only use an Occupational Therapist where a more in-depth and functional assessment of medical needs is required; we will clarify the supporting information we require from an applicant to assess their needs to speed up the process; we will give people the opportunity to manage their own risks and problem solve sooner, by accessing clinics, community schemes and in the future online self-assessment)
- To restrict the Accessible Housing Register to those who are unable to resolve their circumstances
- To align the number of offers to the Main Housing Allocations Policy (applicants in the Platinum Band which includes those in hospital unable to return home and needing rehousing receive one timely offer. All other applicants receive two offers)
- To make sure people waiting to leave hospital whose current home cannot be adapted to meet their needs (or who are homeless) are afforded the highest rehousing priority
- To make best use of the significantly adapted properties available to relet. This means that we will be flexible on what type of property different households can have to meet their needs.

11. All of the above proposals received significant majority support, within between 71% and 85% being in favour. Some people were neutral about the proposals with only a relatively small minority (between 4% and 7% depending on the question) either disagreeing or strongly disagreeing.

### **OPTIONS CONSIDERED**









12. Not approving these changes will continue the current situation, with relatively long waits, low degrees of satisfaction and inefficient use of available housing.

### **REASONS FOR RECOMMENDED OPTION**

13. Approving these changes in policy will enable us to provide adapted housing in a timelier way to people living with disabilities whose wellbeing will be positively impacted through the provision of an adapted dwelling. With an aging population and the need for an increase in adapted homes in the future this policy will remove barriers that are currently in place under the current policy, reducing unnecessary functional assessments, waiting times and will allow us to have better strategic oversight of the complex housing needs of local people.

14. Approving these changes will not impact upon wider factors, for example availability of properties which may vary by location and availability of tradespeople to provide timely adaptations. However it will enable a significant improvement in current issues independent of these factors.

## IMPACT ON THE COUNCIL'S KEY OUTCOMES

Great 8 Priority	Positive Overall	Mix of Positive & Negative	Trade-offs to consider	Neutral or No implications
 <b>Tackling Climate Change</b>	✓			
Making best use of existing housing stock and proportionate use of adaptations to reduce carbon footprint				
 <b>Developing the skills to thrive in life and in work</b>	✓			
Supporting people to have accessible and stable housing that provides the foundation for further achievement				
 <b>Making Doncaster the best place to do business and create good jobs</b>				✓
 <b>Building opportunities for healthier, happier and longer lives for all</b>	✓			
Ensuring access to accessible housing that supports health and wellbeing				
 <b>Creating safer, stronger, greener and cleaner communities where everyone belongs</b>	✓			
Helping people live in communities where they feel comfortable				
 <b>Nurturing a child and family-friendly borough</b>	✓			
Helping families support each other in accessible accommodation				
 <b>Building transport and digital connections fit for the future</b>				✓
 <b>Promoting the borough and its cultural, sporting, and heritage opportunities</b>				✓
<b>Fair &amp; Inclusive</b>	✓			
Ensuring housing does not act as a barrier to somebody with a disability or health condition feeling welcome and able to make a contribution in their community				

## **Legal Implications [Officer Initials: NC | Date: 19/6/23]**

15. Section 166A of the Housing Act 1996 requires that every Local Housing Authority must have an allocations policy for determining priorities between people who qualify for an allocation of housing and the procedure to be followed. Local Authority Housing Allocations Policies have to be legally compliant with Part VI of the Housing Act 1996, and statutory guidance issued by the Secretary of State.
16. The AHR policy governs the assessment and allocation procedures relating to the Council's accessible housing stock in the context of the Council's main allocation policy.
17. In determining priorities, an allocation policy must secure reasonable preference for the following categories of people:
  - Homeless persons or persons threatened with homelessness
  - Persons occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
  - Persons who need to move on medical or welfare grounds; and
  - Persons who need to move to a particular locality within the local authority's area and a failure to meet that need would cause hardship to themselves or others.
18. A Local Housing Authority must not allocate housing accommodation except in accordance with their allocation policy section (166A (14) Housing Act 1996).
19. In compliance with the duty on the Council to act fairly, an extensive public and stakeholder consultation exercise has been undertaken on the proposed changes to the Policy. The responses received as part of the consultation must be consciously taken into account by elected members, before a final decision is made on the proposals.
20. In considering the proposals contained within this report, elected members are also reminded of their obligations under section 149 Equality Act 2010. This section contains the Public Sector Equality Duty (PSED), which obliges public authorities, when exercising their functions, to have 'due regard' to the need to:
  - Eliminate discrimination, harassment and victimisation and other conduct which the Act prohibits;
  - Advance equality of opportunity between people who share relevant protected characteristics and those who do not; and
  - Foster good relations between people who share relevant protected characteristics and those who do not.
21. Protected characteristics are age, disability, race, sex, sexual orientation, gender reassignment, religion or belief and pregnancy and maternity. Only the first aim of the PSED set out in paragraph 20 above applies to a further protected characteristic of marriage and civil partnership.

22. Having due regard to advancing equality involves:
- Removing or minimising disadvantages suffered by people due to their protected characteristics;
  - Taking steps to meet the needs of people from protected groups where they are different to the needs of other people; and
  - Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.
23. Elected members must consciously consider and have due regard to the three aims of the general equality duty when dealing with the recommendations contained within this report. A completed due regard statement has been produced at Appendix C to assist elected members in this regard.

**Financial Implications [Officer Initials: EP - AWC/DH - SLHD | Date: 23/06/23]**

24. There are no direct or immediate financial implications with the approval and implementation of the Accessible Housing Register policy changes.
25. There is a potential impact on resource requirement within St Leger Housing of Doncaster (SLHD) allocations service on the demand for accompanied viewings involving the SLHD Occupational Therapist, which is a standalone post, as currently all AHR viewings are supported by the Accessible Housing Register Co Ordinator who is an Occupational Therapist within City of Doncaster Council.
26. There will also be a need to review resource implications within the Allocations Team when assessment processes are reviewed and agreed in line with policy changes, as there are currently only two posts within this service including the OT who assess medical housing applications and the implications on these changes are dependent on the alternative assessment processes required.
27. Any future change to resources will need to be subject to further approval processes.

**Human Resources Implications [Officer Initials: AT | Date: 22/06/23]**

28. There are no HR implications.

**Technology Implications [Officer Initials: PW | Date: 19/06/23]**

29. An in-house SQL database (Rapid) is used to maintain the AHR and support the associated processes. Where any changes to the database are needed in relation to the proposed policy changes, a 'Request Change to System' form will need to be completed via i-Serve.

**RISKS AND ASSUMPTIONS**

30. There is potential for legal challenge against any aspect of the policy by an individual or organisation. In terms of the recommendations made the extent and robustness of the consultation is mitigation but is not a guarantee that a challenge will not be made. As accommodation becomes scarcer, the potential for challenge

increases. Legal services have provided advice and guidance through the review as further mitigation against a successful challenge.

## **CONSULTATION**

31. Consultation has been carried out and is detailed in Appendix B.

## **APPENDICES**

**A** Doncaster Council Accessible Housing Register Policy

**B** Consultation Response Report

**C** Due regard statement

## **GLOSSARY OF ACRONYMS AND ABBREVIATIONS**

AHR – Accessible Housing Register

OT – Occupational Therapist

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City of  
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# Accessible Housing Register Policy 2023

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# 1. Introduction

Appropriate housing is crucial in helping people who have difficulty accessing their environments to be more independent, safe, and well.

For some people and their unpaid carers, environmental barriers in the home can have a negative impact on both physical and mental health and lead to other disadvantages in life such as a lack of employment opportunities, reduced community engagement and financial hardship.

Providing suitable accessible homes enables people to go about their daily life safely and more independently with greater choice and control over their lives.

The main aim of the City of Doncaster's Accessible Housing Register (Accessible Housing Register) is to assist people needing more accessible environments to be matched to an adapted home that will be best suited to meet their needs.

The policy allows those with identified needs to apply for appropriate housing and where required access to a functional assessment to identify any more specialist requirements. This is solely for the purpose of allocating significantly adapted properties. All applications for other social housing properties will be made through St Leger Homes Doncaster Home Choice or by contacting Housing Associations direct.

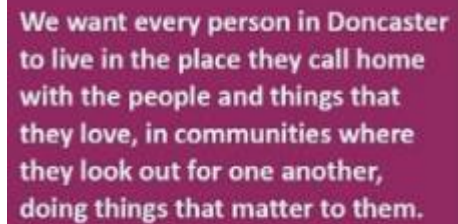
As demand for adapted properties continues to increase this policy sets out how we aim to support people requiring an adapted home at the earliest opportunity

## Definition of an Adapted Property

1.1 For the purpose of this policy, the following definition will apply to the term 'Adapted Property'

**An adapted property is one that contains two or more of the following key features:**

- ✓ Stair Lift
- ✓ Ceiling track hoists
- ✓ Vertical Lift
- ✓ Step Lift
- ✓ Widened doors
- ✓ Significant ramping or Level access to two or more access point
- ✓ Level access shower or wet room
- ✓ Specialist wash dry toilet
- ✓ Environmental controls e.g. temperature sensors, curtain closers and door openers



We want every person in Doncaster to live in the place they call home with the people and things that they love, in communities where they look out for one another, doing things that matter to them.

Adults, Health and Wellbeing  
Doncaster Council

[www.doncaster.gov.uk](http://www.doncaster.gov.uk)

- ✓ Kitchen units – with significant adaptations, for example, lowering or raising work surfaces, variable height surfaces, installation of sinks surfaces with space beneath for use from a wheelchair
- ✓ Ground floor living where a parlour room can be used as a bedroom (minimum space standards) and be fit for purpose
- ✓ Wheelchair accessible properties
- ✓ Car Port – purpose built
- ✓ Purpose built Disabled persons bungalows

*This is a list of examples but is not exhaustive*

**If a property has any of the following features but not two of the above it is not defined as an adapted property:**

- ✓ Grab rails
- ✓ Handrails
- ✓ Stair rails
- ✓ Cubicle or step in or Easy Access Shower
- ✓ Ramping to entrance that doesn't comply to current standards, with no level platform, including wooden ramps
- ✓ Raised sockets
- ✓ Lowered light switches
- ✓ Level access Living Accessible (via a Lift)
- ✓ Ground floor living (e.g. bungalow, ground floor flat, flat with lift access)
- ✓ Off street parking

## **2. Scope**

- 2.1 This policy outlines the purpose, process, criteria and controls of the Doncaster Accessible Housing Register.
- 2.2 It applies to the City of Doncaster Council and those implementing and assessing applicants in conjunction with St Leger Homes of Doncaster who manage homes on behalf of the City of Doncaster Council.

## **3. Aims of the Policy**

This document sets out a clear framework that provides guidance regarding the application and assessment process to identify needs sooner, and to find suitable living accommodation.

This enables people to live a fulfilled life in a suitably accessible property which promotes their safety and independence.

The policy sets out to:

- Provide continuity through consistent referral and assessment procedures

- Clarify the eligibility criteria for accessible housing

## **4. Purpose of the Doncaster Accessible Housing Register**

4.1 The Doncaster Accessible Housing Register purpose is to;

- Reduce delays in discharges from hospital where applicants are unable to return to their previous accommodation.
- Avoid unnecessary spend on adaptations, for example, where adapting a property is not a suitable long-term solution for the housing needs of the applicant.
- Support people to retain choice and control over where they choose to live, for example where people have local support networks, whilst supporting people to make informed decisions based on housing stock.
- Predict future housing demand for adapted properties and accessible homes to inform related strategies and development plans.

## **5. Principles of the Doncaster Accessible Housing Register**

- 5.1 In order to be considered for accessible housing the applicant must be registered with Doncaster Home Choice, the choice-based lettings system operated by St Leger Homes of Doncaster at [www.stlegerhomes.co.uk](http://www.stlegerhomes.co.uk).
- 5.2 Following receipt of the application for housing and request for an assessment for an accessible property, the applicant is sent a medical self-assessment form to complete and return to St Leger Homes of Doncaster.
- 5.3 A medical self-assessment is not required when an applicant is allocated an Occupational Therapist through circumstances such as they are in hospital, or living outside the City of Doncaster. If the applicant's health professional has identified the need to be rehoused they will need to identify what the persons requirements are including:
- ✓ The applicant's medical conditions and medication
  - ✓ The type of property they currently reside in and difficulties experienced in that property
  - ✓ The type of property and adaptations required to meet their assessed medical needs

- ✓ Whether the person would be happy to stay in their own home if it was possible to adapt it.

5.4 The completed self-assessment form identifies:

- Whether the person would be happy to stay in their own home if it was possible to adapt it.
- Provide a copy of a GP patient summary (Which is available free of charge) evidencing the applicant's medical conditions, medication, diagnosed conditions and any ongoing investigations.
- The type of property they currently reside in and difficulties experienced in that property.

5.5 Should the information provided suggest that the applicant has difficulty accessing facilities within their current home.

- ✓ The applicant will be asked to provide further evidence from a health professional if required.
- ✓ The applicant may be asked to attend one of our Clinics, or may be prescribed aids and adaptations through City of Doncaster Council, or St Leger Housing Occupational Therapy services.
- ✓ Where the applicant is an existing Doncaster Council tenant they may be assessed by an Occupational Therapist from St Leger Homes of Doncaster who may conduct a full functional assessment dependent on the evidence provided.
- ✓ Where the applicant is not a Doncaster Council tenant they may be assessed by an Occupational Therapist from Doncaster Council who may conduct a full functional assessment dependent on the evidence provided.
- ✓ Assessments could be by telephone, liaison with other professionals, clinic appointment or a home visit.

5.6 Accessible housing may not always be the best solution for young children with disabilities as an adapted environment may further disable a child by limiting their opportunities to learn the skills to overcome environmental barriers and meet certain developmental milestones and life skills. However there are circumstances in which accessible housing is deemed to be the most appropriate solution for a child with disabilities. Individual circumstances will be assessed, taking in to account the current and future needs of the child and their family by an Occupational Therapist in the Children's Disability Team.

## 6. Assessment

6.1 The Occupational Therapist assessment for the Accessible Housing Register will consider the person's immediate and long-term needs, their carers/ family, current social and environmental situation, medical condition, how they are currently managing and any risks. Proposed requirements and potential solutions will be discussed with the individual.

The Occupational Therapist will explore with the person if their needs can be resolved in their current property with the provision of equipment and/or adaptations and will recommend what is necessary and appropriate to meet the person's needs.

City of Doncaster Council adaptations team will assess if it is technically feasible, reasonable and practicable to carry out the recommendations made by the Occupational Therapy for adaptations to a property.

Where stair lifts, vertical lifts or ceiling track hoists are assessed as a suitable option but not technically feasible, confirmation will be required from a company specialising in supply/fit of said equipment to confirm this decision.

A scheme of Major adaptations will not generally be considered where a person is under occupying a family home, for example where a family home is being occupied by a single or couple - although in certain circumstances it may be agreed to be the only suitable option. Any adaptations would be subject to written permission from the owner/ Landlord.

- 6.2 Assessment of need will establish whether the applicant can resolve their own housing need via adaptation, or where rehousing is the most appropriate outcome.
- 6.3 The applicant's current needs will be assessed within the Doncaster Council's Allocation Policy in terms of registration and eligible bedroom allowance. Any additional housing need will be assessed by St Leger Homes of Doncaster in accordance with Doncaster Council's Housing Allocations Policy.
- 6.4 Following the assessment, the details of eligible applicants are entered on the Accessible Housing Register database to be potentially "matched" to an appropriate property when it becomes available.
- 6.5 Recommendations for eligible properties on the Accessible Housing Register are assessed in terms of level of risk due to medical need, and eligible un- adapted (if applicable) and adapted property type. Confirmation is sent in writing to the applicant from St Leger Homes of Doncaster. This includes assessed property requirements and their band on Doncaster Council Allocation Policy. See section 7 and 8 for more information regarding eligibility and banding.
- 6.6 The applicants on the Accessible Housing Register require adapted properties to meet their assessed needs. Applicants cannot be on both the general housing register and the accessible housing register as this would not be equitable. Applicants will not be considered for un-adapted properties or those requiring substantial further adaptations, unless it is identified by the Housing Solutions Group that their need cannot be met within the current housing stock.

6.7 Applicants on the Accessible Housing Register are not required to place bids on properties advertised by St Leger Homes of Doncaster at [www.stlegerhomes.co.uk](http://www.stlegerhomes.co.uk). The co-ordinator will identify suitable properties that meet the assessed needs reducing risks to the applicant's health, safety and well-being.

6.8 Tenancies for adapted properties allocated via the Accessible Housing Register will be in the sole name of the individual who was assessed as requiring the adapted property.

## 7. Eligibility Criteria/Accessible Housing Register Process

Applicants with an assessed housing need that results from their disability/medical condition will be accepted onto the Accessible Housing Register in accordance with the following conditions:

<p><b>Eligible for Accessible Housing Register – On Priority</b></p>	<ol style="list-style-type: none"> <li>1. Emergency medical priority where the applicant's health and safety is severely affected by their current housing situation and they are at great risk of physical or psychological harm.</li> <li>2. Where the applicant is in hospital awaiting discharge but prevented from returning home as their current home cannot be adapted to meet their needs.</li> <li>3. Where the applicant is suitably housed in an adapted property but have an urgent need to move to be near to carers who provide a substantial amount of support, without which the applicant would be unable to live independently in the community.</li> <li>4. Where conditions in point 1 are met, and an applicant lives in a private sector property and it is not feasible to adapt the property, either because of technical difficulties or prohibitive costs to be undertaken.</li> <li>5. Where conditions in point 1 are met, and an applicant lives in a private sector property and any adaptations would not provide a medium/long term solution, and the applicant would be at risk in the future.</li> <li>6. In all complex situations in points 4-5, these cases may be referred to the Housing Solutions Group, to enable a review of their options to agree an appropriate course of action.</li> <li>7. Where an applicant has been assessed as unintentionally homeless, in priority need (vulnerable as defined in Part VII of the Housing Act 1996) with an assessed need for this type of accommodation.</li> <li>8. Where there are other identified housing needs awarded Platinum or Gold Banding which are not related to a</li> </ol>
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	medical rehousing need with an assessed need for this type of property.
<b>Eligible for Accessible Housing Register - Not On Priority</b>	<ol style="list-style-type: none"> <li>1. Where the applicant is suitably housed in an adapted social housing property but would prefer to move to another area and this can only be achieved by moving to another adapted property.</li> <li>2. Where there are other identified housing needs which are not related to a medical rehousing need, with the exception of applicants who have a desire to move from one adapted property to another.</li> </ol>
<b>Not Eligible for Accessible Housing Register</b>	<ol style="list-style-type: none"> <li>1. Where an applicant's needs are or can be met within their current home e.g. via equipment, adaptations and there are no other identified housing needs e.g. overcrowding.</li> <li>2. Where an applicant's housing needs can be resolved by the applicant.</li> <li>3. Where there is no housing need relating to the applicant's eligible medical condition and impacting upon functional ability.</li> <li>4. Where an owner occupier's needs can be met via adaptations to their property and they refuse adaptations.</li> <li>5. Applicants who own or have a financial interest and/or have transferred ownership of a property but have continuing rights to live there with equity in their property of more than £120,000 will not be registered unless they have an assessed housing need which they are unable to resolve. This is to support access to affordable housing predominantly for older people to access appropriate sheltered housing and reduce demand on Adult Social Care.</li> </ol>
<b>St Leger Homes</b>	St Leger Homes will assess any other identified housing need in accordance with Doncaster Council's Housing Allocations Policy.

## 8. Priority banding

8.1 Priority banding is awarded to an applicant with a medical need to be rehoused, who cannot resolve their own housing needs, where there is an identified risk in their current home and to applicants assessed in Platinum or Gold band with an assessed need for this type of accommodation. Priority banding is maintained until there is a change of circumstances such as successful rehousing.

8.2 One reasonable offer of accommodation will be made to applicants who are in hospital or placed in a temporary care setting from hospital awaiting discharge

but prevented from returning home as their current home cannot be adapted to meet their needs.

- 8.3 Where an applicant has been assessed as unintentionally homeless, in priority need (vulnerable as defined in Part VII of the Housing Act 1996) with an assessed need for this type of accommodation.

All other applicants will be made two reasonable offers of accommodation

If refused their application will be suspended for 6 months and not nominated for a property during this period for further details see section 14 – Refusals and Penalties

Each case will be assessed individually as to the reason for their refusal before a decision is made to suspend an application.

Applicants will be informed in writing and will be given the right to a review. This is consistent with Doncaster Council's Housing Allocations Policy.

## **9. Appeals procedure**

- 9.1 Where an applicant does not meet the eligibility criteria for Accessible Housing Register confirmation is sent to the applicant, outlining the eligibility criteria and signposting to other services for advice and assistance where necessary. The applicant will have a right of appeal against the Accessible Housing Register decision.
- 9.2 The Housing Solutions Group will review appeals against the decision not to include applicants on the Accessible Housing Register. Written confirmation of the outcome will be sent to the applicant.
- 9.3 People who do not meet the criteria for Accessible Housing Register can apply to be reassessed if their circumstances have changed significantly with regards to their medical/ health or environment.

## **10. Bidding and Reviews**

- 10.1 People on Accessible Housing Register are advised of the type of adapted properties they are eligible to secure appropriate to their needs. The applicant will not be eligible for a property type which does not reflect the recommendation made by the assessing Occupational Therapist and puts them at similar or greater risk than their current circumstances.
- 10.2 Should an applicant housed by Accessible Housing Register request a move to a different area and have no identified housing need or risk in their current home they will be added as a non-priority applicant after a qualifying period of 12 months in their current home. They can also consider mutual exchange but



would only be able to proceed if the new property met their identified medical needs for all parties involved in the application.

- 10.3 Regular reviews of the applicants on Accessible Housing Register will be conducted to take account of changes in circumstances and act on feedback from offers made.
- 10.4 If there is limited, or no, housing stock meeting an applicant's assessed needs in their area of choice, we will advise applicants accordingly once all options have been explored. This will give them the opportunity to review their area of choice if necessary. Applicants who choose not to do so will be reducing their chances of being rehoused.

## **11. Matching Properties**

- 11.1 Accessible Housing registrants will be nominated for properties according to clinical need, level of risk and property attributes as ascertained by the Occupational Therapist.
- 11.2 Adapted properties identified to meet the person's needs must be viewed and assessed for suitability and recommendations for any minor adaptations and equipment not already in situ.

## **12. Nominations**

- 12.1 When a Local Authority or Housing Association adapted property becomes vacant, the basic details and property attributes along with photos and a floor plan where available are sent to the Accessible Housing Team for nominations.
- 12.2 The details of the property are entered onto the Access data system and a match is run for people's requirements in line with the features of the property, and will be matched in priority order.
- 12.3 A shortlist is generated as in 11.1 and sent to Doncaster Home Choice and the applicants are contacted in turn and offered a joint viewing of the property a formal offer may be made if the property is suitable. Housing Association properties are sent to the appropriate agency to approach the nominees, and viewing arranged to ensure that they meet assessed needs.

- 12.4 If an applicant declines a property the reasons given are recorded and the case is reviewed where necessary. A note of whether the accommodation offered was suitable will also be made. The next person on the list is then approached. Where an applicant accepts a suitable property they are removed from the Accessible Housing Register when their tenancy commences.
- 12.5 Should any Accessible Housing Register property not have any nominations and those waiting have been exhausted the property would be advertised for general let/bidding through Home Choice.
- 12.6 The turnaround time from nomination request to shortlist submission is 5 working days to minimise void rent loss and to meet Service Level Agreements, this includes ensuring that the property is in good condition for the successful tenant to be allocated.

## **13 Adaptations**

- 13.1 In exceptional circumstances we may undertake adaptations to the current property whilst the applicant is waiting to be rehoused in order to ensure that any risk is minimised.
- 13.2 Should the applicant meet the criteria for adaptations and the property can be adapted, and they are also eligible for Accessible Housing Register, the applicant can remain on the Accessible Housing Register in exceptional circumstances and will be approved through Housing Solutions Group.
- 13.3 Should a suitable property be identified before costs are incurred for adaptations then the applicant should consider moving as a cost effective option and the adaptations cancelled.
- 13.4 Where an owner occupier's needs can be met via adaptations to their property and they refuse adaptations, they will not be added to the Accessible Housing Register.

Applicants who own or have a financial interest and/or have transferred ownership of a property but have continuing rights to live there with equity in their property of more than £120,000 will not be registered unless they have an assessed housing need which they are unable to resolve. This is to support access to affordable housing predominantly for older people to access appropriate sheltered housing and reduce demand on Adult Social Care.

## **14 Refusals and Penalties**

14.1 Applicants will be subject to the terms of City of Doncaster Council's Housing Allocations policy.

14.2 This is;

- Hospital discharges in the platinum band will receive one suitable offer of accommodation,
- Any offer would need to be suitable and reasonable to the patient. Should someone not have their expectations met, then there would be dialogue between the patient, the Hospital and St Leger Homes about any options including other suitable alternative accommodation
- Once this is exhausted, refusal of a reasonable and suitable will result in their application being suspended for 6 months and no further offer being made during this period.
- Homeless applicants in the platinum, gold or silver bands will receive one suitable offer of accommodation, refusal of which will result in their application being suspended for 6 months and no further offer being made during this period. Their priority will also be removed.
- All other applicants will receive two suitable offers before their application is suspended for six months and no further offers will be made during this period.

## Glossary of Terms

**Accessible Housing** accommodation that is purpose built or adapted to meet the needs of disabled people.

**Adaptable housing** accommodation which can be adapted to meet the needs of the applicant.

**Equipment** provision to assist or enable the applicant to carry out activities of daily living including personal hygiene, mobility, toileting, etc.

**Void** empty properties awaiting tenancy.

**Choice based lettings** system of allocating social housing, encouraging choice and control for the applicant in where they want to live.

**Property category** property categorised in terms of type and level of adaptation.

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### Consultation Response Report

What was the consultation about and who was consulted?	The consultation
Over what period did the consultation run?	Public consultation was carried out between 20 January and 13 June 2023 over 19 weeks.
How many responses were received?	<ul style="list-style-type: none"> <li>• 73 responses were received</li> <li>• 38 additional comments</li> </ul>
Where will the results be published?	Results will be published on the council's website <a href="http://www.doncaster.gov.uk">www.doncaster.gov.uk</a> as part of the decision-making process.
How will the results be used?	To inform recommendations of which amendments are adopted in the policy as part of the decision-making process

#### Public Consultation

A full list of comments received during the public consultation is provided in **Appendix D**. This includes those redacted for offensive or personal content. Note: some figures may not sum due to rounding.

#### Tenure Groups

Responses were also profiled by tenure and whether the respondent had an active housing application.

**Q:** Please tell us which of the following groups you belong to (select all that apply)

	All responses (%)	All Responses (Value)
An active Doncaster Council Housing Register applicant	27.93	31
On the Accessible Housing Register	35.14	39
Social Housing Tenant	14.41	16
Private Rented Tenant	10.81	12
Owner Occupier	8.11	9
Lodger	0.00	0
Homeless	0.90	1
Other	1.80	2
No Answer	0.90	1

#### Responses to the Proposed Policy Amendments

##### Amendment 1

We will be changing the definition of an adapted property to only include significantly adapted and accessible properties on the register that are wheelchair accessible have specialist equipment in place or have been specifically adapted.

**Why are we recommending this?** To reduce the number of properties sent to AHR to significantly adapted properties for applicants with more specialist needs. To Increase the number of properties available to everyone else through the bidding process so customers decide what to bid on (For example bungalows or properties with level access bathrooms).

- ✓ We will give additional priority on the bidding shortlist to those with an assessed need for adapted properties before those who do not. Those who do not have a need for a majorly adapted property will be able to bid sooner for a property that equally meets their needs
- ✓ We will speed up the application process for all involved
- ✓ We will be more transparent on the allocations process

**Q: What are your thoughts on amendment 1?**

	Responses (%)	Responses (Value)
Strongly Agree	39.73 %	29
Agree	45.21 %	33
Neutral	2.74 %	2
Strongly Disagree	1.37 %	1
Disagree	2.74 %	2
Did Not Answer	8.22 %	6
Strongly Agree/Agree Total	84.93 %	62
Total Responses		73

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	26.13	0.00	26.13
On the Accessible Housing Register	30.63	0.00	30.63
Social Housing Tenant	12.61	1.80	10.81
Private Rented Tenant	9.01	0.00	9.01
Owner Occupier	6.31	0.00	6.31
Lodger	0.00	0.00	0.00
Homeless	0.90	0.00	0.90
Other	0.90	0.90	0.00

*No additional comments received*

**Amendment 2**

We will Reduce the number of applicants on the AHR to those with specialist needs for

majorly adapted properties, whilst enabling others to bid for properties sooner without the need in most cases for an Occupational Therapy Assessment

**Why are we recommending this?**

- ✓ We will provide specialist support to those that need it, including realistic options
- ✓ We will ensure we are identifying gaps in provision at an early stage to inform new build and acquisition programmes
- ✓ We will empower those with lower needs to find accommodation through the bidding process and see everything they can bid on
- ✓ We will be more transparent on the allocations process

**Q: What are your thoughts on amendment 2?**

	Responses (%)	Total Responses (Value)
Strongly Agree	32.88	24
Agree	41.10	30
Neutral	13.70	10
Disagree	1.37	1
Strongly Disagree	2.74	2
Did Not Answer	8.22	6
Strongly Agree/Agree Total	73.97	54
Total Responses		73

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	22.52	1.80	20.72
On the Accessible Housing Register	27.93	0.00	27.93
Social Housing Tenant	10.81	0.00	10.81
Private Rented Tenant	9.01	0.90	8.11
Owner Occupier	6.31	0.00	6.31
Lodger	0.00	0.00	0.00
Homeless	0.00	0.00	0.00
Other	0.90	0.90	0.00

*No additional comments received*

**Amendment 3:**

We want to simplify the assessment process

### Why are we recommending this?

- ✓ We will only use an Occupational Therapist where a more in-depth and functional assessment of medical needs is required
- ✓ We will clarify the supporting information we require from an applicant to assess their needs to speed up the process
- ✓ We will reduce waiting times for those requiring all levels of adapted properties
- ✓ We will use a risk matrix to determine priority and consistent decision making
- ✓ We will give people the opportunity to manage their own risks and problem solve sooner, by accessing Clinics, Community schemes and in the future online self-assessment.

### Q: What are your thoughts on amendment 3?

	Responses (%)	Responses (Value)
Strongly Agree	35.62	26
Agree	43.84	32
Neutral	8.22	6
Disagree	0.00	0
Strongly Disagree	5.48	4
Did Not Answer	6.85	5
Strongly Agree/Agree Total	79.45	58
Total Responses	73	

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	23.42	1.80	21.62
On the Accessible Housing Register	27.93	1.80	26.13
Social Housing Tenant	11.71	0.90	10.81
Private Rented Tenant	8.11	0.00	8.11
Owner Occupier	7.21	0.00	7.21
Lodger	0.00	0.00	0.00
Homeless	0.90	0.00	0.90
Other	1.80	0.00	1.80

### Amendment 4:

Accessible Housing register will be restricted to those who are unable to resolve their circumstances



**Why are we recommending this?**

- ✓ *To ensure significantly adapted properties which are extremely limited in the Housing Stock are allocated to those who most need it*
- ✓ *We will ensure best use of the limited numbers that become available to relet*
- ✓ *We will help those most in need who do not have any other options*
- ✓ *To ensure older people who need bungalow accommodation with adapted bathing will be assessed through the Housing Allocations Policy*

**Q: What are your thoughts on amendment 4?**

	Responses (%)	Responses (Value)
Strongly Agree	45.21	33
Agree	45.21	33
Neutral	4.11	3
Disagree	0.00	0
Strongly Disagree	1.37	1
Did Not Answer	4.11	3
Strongly Agree/Agree Total	90.41	66
Total Responses	73	

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	25.23	0.90	24.32
On the Accessible Housing Register	31.53	0.90	30.63
Social Housing Tenant	13.51	0.00	13.51
Private Rented Tenant	9.91	0.90	9.01
Owner Occupier	8.11	0.00	8.11
Lodger	0.00	0.00	0.00
Homeless	0.90	0.00	0.90
Other	1.80	0.00	1.80

**Amendment 5:**

Align the number of offers to the Main Housing Allocations Policy

***Why are we recommending this?***

- ✓ *This will ensure a consistent approach to the number of offers of social housing made to applicants after the last Allocations Policy review and has already been consulted on and agreed and supported through the consultation*
- ✓ *This will support applicants through the rehousing process more quickly where they are in a position to be offered accommodation*
- ✓ *Ensure homeless applicants receive one offer in a timely way*
- ✓ *Ensure applicants in the Platinum Band which includes those in hospital unable to return home and needing rehousing as their current property is not viable to be adapted receive one offer in a timely way*
- ✓ *Ensure two offers for all other applicants including those on Accessible Housing Register*
- ✓ *This will ensure all offers are suitable to meet identified needs*

**Q: What are your thoughts on amendment 5?**

	Responses (%)	Total (Value)
Strongly Agree	35.62	26
Agree	38.36	28
Neutral	13.70	10
Disagree	0.00	0
Strongly Disagree	1.37	1
Did Not Answer	10.96	8
Strongly Agree/Agree Total	73.97	54
Total Responses	73	

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	19.82	0.90	18.92
On the Accessible Housing Register	26.13	0.90	25.23
Social Housing Tenant	11.71	0.00	11.71
Private Rented Tenant	7.21	0.00	7.21
Owner Occupier	6.31	0.00	6.31
Lodger	0.00	0.00	0.00
Homeless	0.90	0.00	0.90
Other	0.90	0.00	0.90

**Amendment 6:**

Add the following reason as the highest priority on Accessible Housing Register - Where the

applicant is in hospital/short stay (from hospital) awaiting discharge but prevented from returning home as their current home cannot be adapted to meet their needs or they are homeless and able to live independently

**Why are we recommending this?**

- ✓ The Local Authority has a legal duty to support hospital discharges as per the National policy with the priority pathway being home.
- ✓ This is currently included in the priority category and should be the highest reason, supporting to reduce pressures across the system by providing alternative accommodation to support timely discharge
- ✓ We will prioritise homeless applicants in hospital or short stay residential care where their priority unmet need is housing.

**Q: What are your thoughts on amendment 6?**

	Responses (%)	Responses (Value)
Strongly Agree	36.99	27
Agree	39.73	29
Neutral	9.59	7
Disagree	0.00	0
Strongly Disagree	1.37	1
Did Not Answer	12.33	9
Strongly Agree/Agree Total	76.71	56
Total Responses		73

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	21.62	0.00	21.62
On the Accessible Housing Register	27.03	0.00	27.03
Social Housing Tenant	10.81	0.90	9.91
Private Rented Tenant	8.11	0.00	8.11
Owner Occupier	5.41	0.00	5.41
Lodger	0.00	0.00	0.00
Homeless	0.90	0.00	0.90
Other	0.90	0.00	0.90

**Amendment 7:**

We will make best use of the significantly adapted properties available to relet, This means that we will be flexible on what type of property different households can have to meet their needs

### Why are we recommending this?

- ✓ *We cannot restrict certain type of properties to certain applicants for example, significantly adapted bungalows to older people when we have other households who need this accommodation who may be at higher risk*
- ✓ *We will ensure significantly adapted properties are used effectively to rehouse applicants with assessed needs for this type of accommodation*
- ✓ *Ensure any allocation will be appropriate, affordable and with support if required and be in accordance with the principles of the main Housing Allocations Policy*

### Q: What are your thoughts on amendment 7?

	Responses (%)	Responses (Value)
Strongly Agree	32.88	24
Agree	46.58	34
Neutral	6.85	5
Disagree	0.00	0
Strongly Disagree	5.48	4
Did Not Answer	8.22	6
Strongly Agree/Agree Total	79.45	58
Total Responses		73

	Strongly Agree/Agree (%)	Disagree/Strongly Disagree (%)	Net Agreement (%)
An active Doncaster Council Housing Register applicant	7.21	0.90	6.31
On the Accessible Housing Register	27.03	0.90	26.13
Social Housing Tenant	9.91	2.70	7.21
Private Rented Tenant	9.01	0.00	9.01
Owner Occupier	7.21	0.00	7.21
Lodger	0.00	0.00	0.00
Homeless	0.90	0.00	0.90
Other	1.80	0.00	1.80

### General Comments

**Q: Is there anything you wish to add or clarify e.g. do you think we have missed something that should be added to Doncaster Council's Accessible Housing Policy? If so, please explain below:**

31 people responded to this question.

Issue	Mentioned
Waiting time for a property	4
Housing Allocation Policy	10
Repairs not being carried out	2
Assessment waiting times	2
Property does not meet needs	4
Waiting for a property is impacting on mental health	1
Lack of transparency regarding the allocation of properties	2
Information sharing/support of the of process and practice guidelines in alternative formats.	1
Doubts about the move <sup>1</sup> to online-assessment	1
Process and practice guidelines	2
Lack of investment in current stock	1
Positive reflection on the proposed changes	2

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# **DUE REGARD STATEMENT**

**Reference No: AWC-F-00001**

**Start Date: 9<sup>th</sup> June 2023**

**Activity: Proposed changes to the Accessible Housing register policy**

**Lead Officer: Liam Thomas**

**Decision Date: 16<sup>th</sup> August 2023**



# ACTIVITY SUMMARY

## INITIAL SUMMARY OF IMPACT

Complete the table below to highlight the impact on protected characteristics. Information on Impact should include the data and information sources that you have used to understand the needs, participation and experiences of each protected group at the start of the due regard process. If there is no impact or you do not yet know the impact then put that in the template. You will complete this exercise again towards the end of the due regard process to show any reduction in impact and provide the decision makers with the final levels of impact.

Age	Neutral
Disability	Very Positive
Care Experience	Neutral
Gender reassignment	Neutral
Homeless & Rough Sleepers	Neutral
Marriage & Civil Partnership	Neutral
Maternity & Pregnancy	Neutral
Poverty	Neutral
Race	Neutral
Religion or Belief	Neutral
Sex	Neutral
Sexual Orientation	Neutral
Veterans & Their Families	Neutral



## ACTIVITY TRACKER

Use this section to track key activities and updates on key milestone. This will evidence what you did, when you did it and the outcome. Any key actions identified need to be added to the action plan and each consultation needs to be recorded in the Consultation Profile. Add extra lines as required

Date	Record of key activity
20 January 2023	Public Consultation started.
13 June 2023	Public Consultation concludes
14 June 2023	Proposed changes to the AHR policy stress tested
19 June 2023 – 23 June 2023	Report and Consultation results shared for feedback and implications
26 June 2023	Report submitted to DLT
28 June 2023	Report amended based on comments from DLT
28 June 2023	Report submitted to ELT
5 July 2023 – 10 July 2023	Report amended based on feedback from ELT
10 July 2023 – 12 July 2023	Report shared with key stakeholders for further feedback and implications.
12 July 2023	Report submitted to Executive Board
19 – 28 July 2023	Report amended based on feedback/comments from Exec Board and shared for final comments
02 August	Report and Dur Regards Statement signed off by AD

# Consultation Profile

As part of your initial assessment you identified evidence/intelligence that supports your assessment of the impact of your proposal on different groups and triggered the need for further information and activity to manage/reduce the impact.

The Consultation Profile will show what consultation(s) you plan to do/ have done to understand the impact of your proposal. It is a living document and should be continually updated as and when required and will inform the content of your Action Plan.

1 <sup>st</sup> CONSULTATION			
<b>Purpose of Consultation;</b>	To consult the public on 7 proposed changes to the Accessible Housing Register	<b>Date of Consultation</b>	20 January – 13 June 2023
<b>Who is the target audience?</b>	A total of 460 people were engaged during the consultation process. The cohort comprised of people currently on the OT and AHR waiting list (260 people) or anyone who engaged in the AHR process over the past 12 months (210 people)		
<b>Proposed Method(s)</b>	Online and paper survey		
<b>Consultation Analysis - What did the consultation tell us?</b>			
<ul style="list-style-type: none"> <li>• A total of 470 surveys were sent to public consultation. 73 responses were received which included an additional 32 comments.</li> <li>• Of those that responded, 27.93 % have an active housing application. 35.14 % are on the AHR, 14.14 % are social tenants, 10.81 % private tenants, 8.11% owner-occupiers, 1% homeless and 1.8% other.</li> <li>• All 7 proposals consulted on received a favourable minimum combined score of Strongly Agree/Agree of over 73% with an aggregate score across all 7 proposed changes of 79.84 %.</li> <li>• An additional 38 free text comments were received, reviewed, and coded to reflect common themes. Any comments of significance were further reviewed in terms of their impact on the people of Doncaster with appropriate mitigations/considerations implemented.</li> <li>• Stress testing of the revamped AHR policy indicated that two thirds of applicants could be supported in finding a suitable property based on their needs [minor adaptations] through. At one point 350 people were awaiting an OT assessment, as of 12/6/23 there are now 10 people on the waiting list.</li> </ul>			

# FINAL IMPACT ASSESSMENT


Complete the section below prior to the final decision report to highlight the final expected impact.

Age	Neutral
Disability	Very Positive
Care Experience	Neutral
Gender reassignment	Neutral
Homeless & Rough Sleepers	Neutral
Marriage & Civil Partnership	Neutral
Maternity & Pregnancy	Neutral
Poverty	Neutral
Race	Neutral
Religion or Belief	Neutral
Sex	Neutral
Sexual Orientation	Neural
Veterans & Their Families	Neutral

# SIGN OFF & APPROVAL FOR PUBLICATION

By signing this statement as complete, you are confirming that:

- 'you' have examined sufficient information across all the protected groups and used that information to show due regard to the three aims of the general duty;
- this has informed the development of the activity and consultation approach;
- this DRS has been to the relevant decision making meeting and the decision has been made;
- this DRS is approved for publication on the City of Doncaster Councils internet page

Assistant Director	 Kate Anderson-Bratt
Date	01.08.23

## MONITOR AND REVIEW

If relevant, please provide information in the text box below on what processes/actions will be put in place to keep this 'activity' under review. For example, will progress be monitored/ reported to a board, scrutiny committee, project board etc. If the 'activity' has a time frame what is the planned review date etc.

- Mobilisation and communications plan is being developed to support the 'go live' date and to mitigate risks identified to those requiring minor adaptations due to the proposed changes to the AHR policy.
- Assisted bidding will be made available as a safety net to support the transition from AHR to general let.
- The impact of implementing the revised AHR policy will be monitored using key data derived from Open Housing and Mosaic data management system as well as monitor and respond to feedback and comments.
- Initial reporting of the implementation of AHR will follow an already established route of governance; AHR Implementation Group reporting to the AHR Board.
- Once implemented, the Housing Solutions Group (an existing group attended by AHWB, SLHD and Strategic Housing) will replace the AHR Implementation Group to monitor and report on the progress of the AHR policy through SMT (Finance & Performance).



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## City of Doncaster Council

### Report

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**Date: 16<sup>th</sup> August 2023**

**To: Mayor and Members of Cabinet**

**Report Title: St Leger Homes Doncaster Management Agreement Review 2023**

<b>Relevant Cabinet Member(s)</b>	<b>Wards Affected</b>	<b>Key Decision?</b>
Cllr Glyn Jones	All	Yes

#### **EXECUTIVE SUMMARY**

1. The purpose of this report is to give consideration and agreement to the renewal of landlord management services to St Leger Homes of Doncaster (SLHD) for the period 1st April 2024 to 31st March 2029.
2. The management agreement between City of Doncaster Council (CDC) and its Arms Length Management Organisation (ALMO), St Leger Homes of Doncaster reached a review point this year. The current management agreement was approved in 2018 for the period April 2014 to March 2024 and was based on a 5-year rolling basis subject to a performance and value for money assessment at the point of review (2023).
3. As such, an internal review has been undertaken to evaluate the existing management agreement to ensure it remains fit for purpose, benchmarking performance and value for money against peer organisations, to establish whether any changes are required to ensure CDC continues to receive value for money, that ALMO performance meets all the standards required, and that tenants are satisfied with the service provision.
4. The 2023 internal review has provided an opportunity to consider SLHD's performance, value for money, what's working well and areas that need improvement, alongside reviewing the best way to respond to the changes in social housing legislation and regulations which have been introduced since 2019, the most recent being the Social Housing Regulation Bill which received assent in July 2023.



5. The outcome of the review has indicated that the agreement is working well, and there is appetite to extend the existing arrangement for a further 5 years from 2024-2029, retaining a review and optional break point in year 3. The Council regards the ALMO as offering the opportunity to respond effectively to the new regulatory and legislative requirements and to make financial efficiencies, working closely with CDC.
6. The review highlighted a number of key areas where CDC require the strengthening of its own management and financial oversight of SLHD, these being:
  - Enhancing the Key Performance Indicators (KPIs) set by the Council;
  - More detailed understanding of the Housemark benchmarking group position to ensure the relative performance of SLHD compared with peer group organisations is clear; and
  - Strengthening CDC's assurance processes to manage, monitor and challenge performance, including financial reporting and general governance, reflecting the focus of the new social housing regulatory inspection regime on councils rather than their ALMOs.

## **EXEMPT REPORT**

7. This report is not Exempt.

## **RECOMMENDATIONS**

8. The report recommends that Mayor and Cabinet:
  - a) Note the findings of the internal review undertaken during 2023.
  - b) Agree to the renewal of the Management Agreement between CDC and SLHD, for a 5-year period from the 1<sup>st</sup> April 2024 – 31<sup>st</sup> March 2029 with a review and optional break point in the contract at year 3.
  - c) Delegate to the Director of Place, in consultation with the Chief Finance Officer, and the Portfolio Holder for Housing & Business, to agree the enhanced oversight measures to be inserted into the Management Agreement. (Strengthened KPI's)

## **WHAT DOES THIS MEAN FOR THE CITIZENS OF DONCASTER?**

9. Access to good quality decent housing is one of the most effective ways we can improve people's wellbeing. A healthy home which is secure, in good repair, warm, comfortable, and free from hazards which could harm our health is one of the foundations for life. By contrast, poor quality housing causes a range of physical and mental health problems, as well as being expensive to heat and causing high carbon emissions. As such the Council needs to ensure that the housing



management functions undertaken by its' ALMO are of good quality; it performs well; represents value for money; meets all the regulatory standards required; and that tenants are satisfied with the service provision.

## **BACKGROUND**

10. St Leger Homes of Doncaster Ltd (SLHD) is the Council's Arms Length Management Organisation (ALMO) established in 2005. SLHD provides housing management function on behalf of the council and as such manages just under 20,000 affordable rented homes on behalf of the Council. It provides services in respect of maintaining and improving homes, tenancy support services for households, supporting people who are homeless into a new home and safeguarding. Decent property standards have been maintained and extensive housing safety improvements implemented. SLHD is a key partner in the Council's move towards a Localities model of service delivery, working closely with other local agencies and partners and with Team Doncaster, to better support residents and communities.
11. During 2023 an internal review has been undertaken to evaluate performance under the existing Management Agreement to ensure it remains fit for purpose. This included carrying out benchmarking analysis of performance against similar social housing providers, reviewing whether any changes are required to ensure CDC continue to receive value for money, that ALMO performance meets all the regulatory and legislative standards required, and that tenants are satisfied with the service provision.
12. Following the review, it is clear that services under the current management agreement are, in general, working well. The benchmarking information provided by Housemark rates SLHD as a low cost and medium to high performing organisation. There are however areas for service improvement identified which will be pursued going forward through the close joint working arrangements between CDC and SLHD. As such it is proposed to extend the existing management arrangement for a further 5 years from 2024-2029, whilst retaining a review and optional break point in year 3. More detailed information regarding the benchmarking exercise undertaken can be found in Appendix A, together with data for 2022/23 from SLHD only, as the full annual benchmarking report for 2022-23 is not yet available from HouseMark.

### **Achievements Since 2019**

13. The most recent published Annual Review by SLHD for 2021-2022 outlines the previous year's performance. Some key highlights from 2021/22 include:
  - Completed 54,971 repairs for customers, with 98.7% completed right first time
  - Carried out 11,268 emergency repairs
  - Supported customers to receive an additional £750,000 of due benefits
  - Prevented 566 households from becoming homeless

- 95.2% of customers said St Leger Homes staff are friendly and approachable
- Spent £24.2m on improving customers' homes
- 71 unemployed local people joined the St Leger Homes World of Work scheme, receiving practical support to gain paid employment
- Completed 100% of gas servicing for their properties, ensuring families continue to be kept warm and safe all year round

14. With regard to best practice standards, SLHD have received the Customer Service Excellence accreditation for 12 years in a row and achieved the 5-Star British Safety Council accreditation for 11 years running, as well as ISO45001 accreditation, the European standard for health and safety, Domestic Abuse Housing Alliance (DAHA) Accreditation, Business in the Community (BITC), and Bewell@work gold standard. SLHD also run employment and education opportunities for tenants through the World of Work academy and local apprentice placements.

### **New Regulatory and Legislative Requirements 2023 – A new key strategic context for Social Housing**

15. New regulatory standards and legislation are being introduced for social housing stemming from the Grenfell fire in 2017. These will strengthen the existing accountability landlords have for providing safe homes, quality services and treating tenants and leaseholders with respect.

16. It crystallises the responsibilities for meeting new regulatory standards which will hold landlords to account for the performance of housing management services. These responsibilities cannot be passed on to an ALMO by a council, and therefore it is CDC who is ultimately responsible for ensuring these standards/requirements are met in Doncaster. Going forward it will be more important than ever that the Council has full assurance that its ALMO is providing accurate information, meeting performance standards and listening to its tenants.

17. The new regulatory requirements include:

- The Social Housing (Regulation) Act, which has just received Royal Assent will put in place a stronger and more proactive regulatory regime to drive up standards in the social housing sector and hold landlords to account for the service they provide to their tenants. This new regime will be implemented from April 2024 but as encouraged by the Regulator for Social Housing (RSH), CDC and SLHD are already working to respond to the elements of the new regime which have been published.
- The 2020 Social Housing White Paper had a number of themes linked by a common thread - that the safety, wellbeing and opinions of social housing residents is paramount and that it is the responsibility of landlords to demonstrate engagement and performance to their

residents. There is a greater emphasis on safety, resident voice, and performance monitoring.

- The RSH is currently consulting on new Consumer Standards backed by a Code of Practice. The new Consumer Standards and Code of Practice are likely to include requirements for landlords to publish policies on tackling domestic abuse, evidence of how they have sought to improve tenant engagement and greater awareness of the complaints process. The RSH will be responsible for enforcing the new standards through a regular inspection cycle as well as reactive investigations where non-compliance with the standards is suspected or identified. Non-compliance with the new standards may result in unlimited fines, and reputation-damaging publication of results.
- Involving tenants will be a key part of a landlord's governance and scrutiny arrangements. Engagement opportunities must be shown to be tailored to residents' needs and interests to support greater involvement.
- Complaint handling by the Housing Ombudsman is to be sped up and simplified so that residents can raise a complaint more quickly directly with the Ombudsman. The Government ran a campaign encouraging social housing tenants to complain where they receive poor service and has also launched a training programme for tenants on how to complain effectively. The Ombudsman will be given powers to take action against landlords who are too slow in handling complaints. The Ombudsman will publish quarterly reports detailing landlords that have failed to handle complaints properly
- A revised Decent Homes Standard ('Decent Homes 2') is currently being devised, which is expected to include energy efficiency requirements in the drive towards carbon net zero and may bring other new criteria into the decency standard.
- New environmental and sustainability requirements are being introduced, which will require additional investment in homes to ensure they meet these new standards.
- The Fire Safety Act 2021 extends the scope of fire risk assessments which need to be carried out for all multi-occupied residential buildings whatever their height, in addition to bringing in a wide range of further building safety measures. (Fire Safety Bill and Building Safety Bill).
- New legislation under Awaab's Law, now embedded in the Social Housing (Regulation) Act, will prescribe new performance targets for responding to and remedying damp, mould, and condensation in social rented homes.

18. In addition to regulatory changes a range of other factors arising out of the Covid-19 pandemic, Brexit, a buoyant employment market, increasing customer expectations, the Doncaster floods, and digital advances have also underpinned operational change and necessitated the need for stronger assurance and

oversight of SLHD and their housing management functions on behalf of the council.

19. Working with CDC, SLHD are putting in place actions to meet the challenges arising from the above issues, some elements of which are:

### **Building Safety and Property Standards**

20. SLHD worked quickly to ensure high rise safety measures were in place – notably ensuring that all high-rise buildings were fitted with sprinklers. The Property Services Team has been reshaped to include a new fit for purpose Health, Safety and Compliance Team improving the approach to building safety across all of the traditional ‘big six’ and now ‘big seven’ areas of property safety compliance (gas, fire, electrical, asbestos, legionella, lifts and damp, mould, condensation). In addition to improved internal process and data management the service has adopted a three lines of defence approach which utilises external inspection and accreditation to provide CDC with additional levels of assurance. CDC established a new Building Safety Group, chaired by the Director of Place, to oversee the response to new building safety requirements and this group is supported by a Building Safety Officer Subgroup. SLHD has also recruited a Head of Building Safety and the Building and Safety Team have since implemented a Resident Engagement Strategy, ensured appropriate fire risk assessment documentation has been completed and is readily available, identified in-scope buildings and registered them with the Building Safety Regulator, the Health and Safety Executive. In addition, all roles and responsibilities named in the Building Safety Act have been agreed and formalised with the Council.
21. SLHD have procured a new asset software platform called C365, to provide a single source of asset compliance data and to develop a golden thread of compliance information. This information collection is still ongoing and building information is being uploaded into the Building Safety Regulator (BSR) portal.
22. This work is supplemented by delivering the replacement of External Wall Insulation (EWI) to five of the in-scope high rise buildings under the Act, as well as undertaking structural surveys and further improving other aspects of fire resilience at these properties.
23. The new requirements around Building Safety are generating additional areas of work and investment in homes, and programmes to address these works are being developed and fitted into the Housing Capital Programme, prioritising works on a risk assessed basis.
24. SLHD are generally performing well in responding to and achieving compliance with new regulations. However, the future still holds plenty of challenges, of which SLHD are aware and preparing for, key highlights of future challenges include:
- Implementation of new Gateways 2 & 3 in the planning, design and building control processes for major refurbishment of in-scope buildings in October 2023. SLHD need to have a robust change management process with clear roles and responsibilities identified internally, whilst also understanding how this affects current and future projects.
  - Updating and digitising key building information required by BSR such as up to date and scaled floor plans.

- Extending EWI evidence gathering for all in-scope buildings to confirm the current compliance position and, if required, to plan for additional works to be carried out.
  - Assess the current risk and use of natural gas via a DSEAR assessment at in-scope high rise buildings with a view to removing and installing alternative.
  - Writing and submitting of building safety cases to the BSR to achieve occupation certification.
  - Reacting and successfully navigating more stringent Regulatory Governance along with mandatory occurrence reporting, thus requiring a robust building safety communication structure and process.
25. All the above activity will continue to be monitored by the Council's Health and Safety Manager and H&S business partner for SLHD, and any significant issues will be raised at the Building Safety Group and brought to the attention of Leadership, where required.
26. Beyond compliance, the approach to delivering the repairs service is in the process of fundamental change. The service remains largely in-house with private contractors providing specialist works and additional capacity where SLHD resources are stretched, or the variable nature of work precludes a regular in-house workforce.
27. In 2021 SLHD commenced its' service improvement drive for 'Repairs Excellence'. This programme aims to modernise the service, drive out inefficiencies and deliver improved services. The first stage was to reduce waste through aborted 'no access' visits. By introducing a system of texting and ringing ahead, St Leger were able to reduce no access visits from approximately 3,500 visits per year, to nearly zero. This has been a fundamental element of St Legers ability to absorb the additional post-Covid demand for repairs without any additional resources. Additional benefits include a near 95% outcome for jobs completed right first time and, crucially, greater transparency and choice for tenants with regard to repairs appointments. It is intended that these changes will improve the satisfaction of tenants with the repairs service.
28. At the start of 2023, St Leger introduced the 'One Repairs Service' by combining reactive and scheduled repairs teams. The impact of these changes is still working through, but notable improvements so far include a reduction of daytime jobs being sent to the out of hours call out service from 30-40 repairs a day at the peak to just 4-5 a day with some days seeing zero jobs being passed over to the emergency repairs service. Post Covid the service was also working with a 'floating list' of repairs. These are repairs which schedulers have been unable to immediately place into operative's diaries. At its peak there were 1,200 floating repairs, today there are none. Some non-urgent scheduled work was paused to enable this transition, however these works are now being analysed and scheduled into diaries on a priority basis.
29. These changes are starting to positively impact on the high level of complaints that were being experienced.

30. Over the past few years recruitment into some technical trades roles has been extremely difficult due to a buoyant employment market. The recruitment picture is constantly changing. However partly in response to such issues, SLHD has developed its' trainee and apprenticeship programme. Looking solely at apprentices, SLHD currently employs 58 apprentices (almost 8% of the total workforce), and the retention rate for trade apprentices over the last 5 years has been 100%.

### **Housing Management Services**

31. Since 2019 there have been a number of policy and community issues which have brought new pressures for housing management services. Key changes impacting on the service include the Social Housing Charter, the introduction of Universal Credit, and the 'cost of living crisis'.

32. As an example, as a result of the transition to Universal Credit SLHD have been required to collect over £17m more rent directly from their tenants. Despite this they still perform well surpassing their target of 2.75% rent arrears for 2022/23. Part of the response St Leger adopted was the introduction of a Tenancy Sustainability team able to offer tenants additional help and support. The team has grown over the past few years and now includes specialists in mental health and addictions. The team has secured financial gains for tenants of over £3.9m, and consistently helps support tenancy sustainability figures in the high 90s%.

33. The Social Housing Charter placed a great emphasis on listening to tenants and shaping service development with the benefit of customer insight. St Leger have responded by reshaping their tenancy engagement service, introducing a new Tenants Voice Strategy, securing accreditation from the Tenants Participation Advisory Service, combining engagement and communication services, and introducing a new umbrella 'One Voice' Forum to act as a conduit between all SLHD tenant engagement channels and the SLHD Executive Team and Board.

34. The Covid-19 pandemic produced a significant increase in demand for homelessness support and SLHD and CDC have been working closely together to boost the additional Government resources temporarily available in these areas. In addition, CDC invested circa £1m as a one-off injection in new staff resources into the Housing Options service to address increased demand and reduce future demand by improving effectiveness in preventing homelessness. Prior to this surge in capacity the service took over from CDC the handling of the out of hours service. Other subsequent structural changes included positioning St Leger Lettings within the homelessness service and increasing resources in this area with the result that homelessness duties are now often dealt with by placing people in appropriate private rented sector properties. Better joint working with the Complex Lives team has been achieved in part by positioning housing staff in the Complex Lives service. These changes have seen a marked reduction in the need to use B&B type accommodation and significant improvements in the availability of advice.

35. The Social Housing Charter, national and local concerns about Anti-Social Behaviour, along with the Council's new A.S.B strategy and developments in the Doncaster Localities model have been behind plans to reshape the housing management service further. These changes will see the introduction of a rolling programme of 'Keeping in Touch' tenancy visits, the creation of a new dedicated A.S.B team, more responsive work visiting tenants when they require help rather than expecting them to visit their landlord.

### **Corporate and Support Services**

36. SLHD have introduced a number of significant digital improvements including: the successful installation of a service-wide housing management IT system which replaced 4 other older systems and the successful introduction of automated calling systems in rent collection and customer support. Other software advances include the installation of Compliance 365 to provide real time data for all building safety compliance areas, adopting a new H&S risk management system; RiskHub. Finally, later this year SLHD will launch a new web site.

37. SLHD have strengthened their Business Assurance team with the introduction of a new Governance Service Manager post, this post is leading the preparation and coordination of the joint approach by SLHD and CDC towards the new housing inspection regime which will go live from April 2024.

### **Future Performance Improvement Measures**

38. Currently SLHD are performance managed against 18 Key Performance Indicators (KPIs), and over 100 other monthly Performance Indicators across all service areas. A robust performance monitoring structure is in place, with meetings taking place regularly between the Council and SLHD. It is anticipated the revised Management Agreement will contain more detailed measures to strengthen the existing KPIs which reflect changes in the social housing regulatory regime.

39. The existing KPIs are as follows:

- % of Current rent arrears against annual debit
- Void rent loss % of rent loss
- Average days to re-let standard properties
- Number of households placed in B&B accommodation
- % of settled accommodation at Prevention stage
- Number of Stage 1 and Stage 2 complaints per 1,000 properties
- % complaints responded to within timescale
- Number of tenancies sustained post support
- Number of repairs first visit complete
- Gas servicing: % of properties with a valid gas certificate
- Days lost through sickness
- Percentage of local expenditure – revenue and capital
- Number of ASB cases per 1,000 properties

- Number of tenants in training, education or employment
- Tenant satisfaction levels overall %
- Percentage of homes maintaining decent standard
- Tenant satisfaction with property condition
- Energy efficiency – target achieve EPC Level C by 2030

40. Future key pieces of work will include:

- key actions to improve customer satisfaction rates.
- key actions to improve the outcomes for tenants from SLHD’s work on tackling ASB.
- Void performance - the provision of more information on fluctuations in void performance into the regular reporting mechanisms.
- Evaluation of the outcomes from the Homelessness Journey to Excellence programme and additional investment to be clear on what has been achieved in terms of increasing the levels of preventions of homelessness, how those achievements can be sustained as the CDC additional funding ends and what still remains to be tackled.
- A new Joint CDC/SLHD Value for Money Task Group to be established Autumn 2023.

41. CDC and SLHD have adopted a proactive approach to raising social housing standards and driving improvements in operational practice and efficiency. This approach cuts across all of SLHD operations. In most instances these additional requirements have been met at no additional cost to the management fee of SLHD, and during this period SLHD has continued to deliver the CDC financial savings agreed.

### **Key Priorities for SLHD**

42. Over the next five years six priorities have been identified in CDC’s Housing Strategy 2020-2025 and SLHD Corporate Plan:

- Maximising Safety - Building safety, staff and resident safety and compliance.
- Making best use of the existing affordable homes they manage.
- Supporting existing and prospective tenants’ wellbeing, including those with specific vulnerabilities, and working hard to make a positive difference to reduce poverty, domestic violence and improve safeguarding. At the same time, seeking to provide more opportunities for tenants through the World of Work scheme, promoting ambition and economic prosperity.
- Ensuring the best Value for Money, delivering benefits for tenants and the Council.
- Listening to, and acting on, the needs and concerns of our customers.
- Ensuring neighbourhoods are safe and pleasant places to live and in which people feel proud to live, and working proactively with Team



Doncaster partners through the Localities working framework to better co-ordinate activity and investment in our local communities.

43. Once a decision has been made to renew the Management Agreement the current document will be thoroughly reviewed and updated to ensure it encapsulates all key current issues, priorities, and ways of working. The new Agreement will then be signed prior to the end of March 2024.
44. During the remainder of 2023-24 CDC and SLHD will be working closely together on further preparation for the new social housing regulatory environment which will come into force from April 2024. This work includes an independent critical friend assessment of current service provision and performance outcomes against the Regulator for Social Housing's proposed new Consumer Standards and Tenant Satisfaction Measures which will commence in September 2023. This work will include further briefings for the Council's Executive Leadership Team and Executive Board, and reports to Cabinet should any be required.

## **OPTIONS CONSIDERED**

The following options have been considered:

### **45. Option 1: Renew the Management Agreement between CDC and SLHD (Recommended)**

Maintain the current arrangement and agree to a further 5-year extension for SLHD for the period April 2024 to March 2029 with a review and optional break point in Year 3.

### **46. Option 2: Bring all or part of the housing related functions that SLHD delivers back into CDC.**

Not recommended as evidence from the internal review undertaken demonstrates the service being delivered is value for money and meets the Councils' requirements.

### **47. Option 3: Commission another provider to deliver the housing related functions on behalf of CDC.**

Not recommended as evidence from the internal review demonstrates the service being delivered is value for money and meets the councils' requirements.

## **REASONS FOR RECOMMENDED OPTION**

48. SLHD has been in operation within Doncaster since 2005. They have previously been independently assessed and regularly internally reviewed to ensure that the services provided continue to be value for money and meet the needs of their tenants. SLHD recognise their challenges and have been flexible in their approach to ongoing delivery. They have adjusted their structure, systems and operating arrangements to ensure good levels of service are offered to our residents.



49. Benchmarking data provided by Housemark indicates that SLHD are a low-cost organisation delivering good services. Under the direction of CDC, the rent levels are the lowest in South Yorkshire and the ninth lowest in the country. The drive to improve value for money and service delivery will continue, to ensure Housing Revenue Account resources are used in the most effective way to benefit tenants and to respond to new service challenges.







50. Continuing with the ALMO allows CDC to maintain a strong focus on supporting social housing tenants and ensures that skilled housing management staff are retained in the borough. The potential net gains from in-sourcing housing management functions back into the Council appear minimal in circumstances where the Council and its ALMO are working to a shared agenda of service improvement, with a continued focus on improving value for money and better supporting our local residents and communities to thrive

51. It is on this basis that, given the level of service provided currently, coupled with performance of Doncaster specific performance metrics, the contract should be extended beyond March 2024 for a further five years with a review and optional contract break point at Year 3. CDC arrangements should be strengthened to ensure that SLHD deliver operational excellence through ongoing resident engagement and good governance structure and oversight.

## IMPACT ON THE COUNCIL'S KEY OUTCOMES

52.

Great 8 Priority	Positive Overall	Mix of Positive & Negative	Trade-offs to consider – Negative overall	Neutral or No implications
 <b>Tackling Climate Change</b>	✓			
Comments:				
 <b>Developing the skills to thrive in life and in work</b>	✓			
Comments:				

 <b>Making Doncaster the best place to do business and create good jobs</b>	✓			
Comments:				
 <b>Building opportunities for healthier, happier and longer lives for all</b>	✓			
Comments:				
 <b>Creating safer, stronger, greener and cleaner communities where everyone belongs</b>	✓			
Comments:				
 <b>Nurturing a child and family-friendly borough</b>	✓			
Comments:				
 <b>Building Transport and digital connections fit for the future</b>	✓			
Comments:				
 <b>Promoting the borough and its cultural, sporting, and heritage opportunities</b>	✓			
Comments:				

<b>Fair &amp; Inclusive</b>	✓			
Comments:				

### 53. Legal Implications [Officer Initials: NJD Date: 20<sup>th</sup> July 2023]

Section 1 of the Localism Act 2011 provides the Council with a general power of competence, allowing the Council to do anything that individuals generally may do. Section 111 of the Local Government Act 1972 gives the Council the power to purchase goods and services.

In accordance Section 27 of the Housing Act 1985, the Council in 2005 transferred its housing management functions to SLHD, who carry out those functions on behalf of the Council.

The Council is the able to renew the arrangement with SLHD as SLHD is referred to as a Teckal company for the purposes of the Public Contracts Regulations 2015 as so the arrangement is permitted in accordance with regulation 12 as the Council is the sole shareholder of SLHD and exercises controls over the operation of SLHD via the SLHD's memorandum and articles of association and there is no direct private capital participation.

SLHD provides its services to the Council in line with the requirements set out in the Management Agreement.

The Management Agreement was previously updated to better meet the needs of the service, and as there are new regulatory and legislative requirements placed on the council, enhanced oversight measures will be put in place.

Legal will provide further advice and assistance as the matter progresses.

### 54. Financial Implications [Officer Initials: MS | Date: 19 July 2023]

St Leger Homes' management fee forms a significant part of the Housing Revenue Account (HRA) budget. In 2023/24 the management fee is £36.687m out of the £65.933m expenditure budget within the HRA.

The management fee is expected to rise to £37.473m in 2024/25, £38.210m in 2025/26 and £38.957m in 2026/27. The increases largely relate to inflation but efficiency savings of £0.333m per annum have also been included.

The HRA budget (including St Leger Homes' management fee) is approved at full Council each year. The process leading up to approval includes reviewing assumptions (such as inflation) and identifying the efficiencies required to meet the annual targets.

## **55. Human Resources Implications [Officer Initials: AC | Date: 20 July 2023]**

There are no direct HR implications to the proposal to renew the management agreement between CDC and SLHD.

## **56. Technology Implications [Officer Initials: PW | Date: 21/07/23]**

There are no specific technology implications in relation to this report. Digital & ICT have a service level agreement (SLA) in place with SLHD for the provision of technology services and support.

## **RISKS AND ASSUMPTIONS**

57. Well established ways of working together provide a strong framework for responding to the challenges affecting social housing including the new regulatory regime. Whilst the full implications and the requirements of the new regulatory environment are still to be confirmed, and this lack of clarity produces risk, the proposals to strengthen CDC assurance processes, and the review point in year 3 of the new agreement, will mitigate these risks.

## **CONSULTATION**

58. Consultation has been undertaken with the Mayor, Cabinet Member for Housing and Business, Directors, and Elected Members. Consultation has also been undertaken with SLHD's One Voice Forum on 15<sup>th</sup> June 2023, and Members engagement through Overview & Scrutiny held on 20<sup>th</sup> July 2023.

## **BACKGROUND PAPERS**

59. SLHD Performance and Value for Money were considered at Cabinet 1<sup>st</sup> March 2023 under the report entitled 'St. Leger Homes of Doncaster Limited (SLHD) performance and delivery update Quarter 3 ended 31 December 2022 (2022/23) and Value For Money Statement (VFM) for the year ending 31 March 2022 (2021/22)'.

## **GLOSSARY OF ACRONYMS AND ABBREVIATIONS**

ALMO – Arms Length Management Organisation

KPI – Key Performance Indicator

RSH – Regulator of Social Housing

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Cost / Perf	Service area	Performance Indicator Description	21/22 Outturn	21/22 Peer Median	21/22 Peer Quartile	20/21 Peer Quartile	22/23 Outturn
Cost	Corporate	Staff turnover in the year %	9.60%	11.80%	Q1	Q1	
Performance	Corporate	Satisfaction overall (STAR)	84.8%	78.0%	Q1	no data	81.3%
Performance	Corporate	Landlord is easy to deal with % (STAR)	85.4%	72.0%	Q1	no data	83.3%
Performance	Corporate	Treats tenants fairly and with respect % (STAR)	90.9%	84.1%	Q1	no data	85.8%
Cost	Cyclical Maintenance	Total CPP	£141	£292	Q1	Q1	
Performance	Cyclical Maintenance	Gas servicing - % valid certificate	100.0%	100.0%	Q1	Q1	100.0%
Performance	Cyclical Maintenance	% gas safety checks by annivers date	100.0%	99.9%	Q1	Q1	100.0%
Performance	Lettings	Dwellings vacant unavailable to let %	0.04%	0.52%	Q1	Q1	0.02%
Performance	Lettings	Void rent loss % of rent loss	0.81%	1.67%	Q1	Q1	0.67%
Cost	Major Works	Total CPP	£971	£1,468	Q1	Q2	
Performance	Major Works	Quality of your home (STAR)	86.5%	75.7%	Q1	no data	75.7%
Performance	Major Works	Home is safe and secure % (STAR)	92.8%	80.4%	Q1	no data	86.6%
Performance	Major Works	% of dwellings that are non-decent	0.01%	0.39%	Q1	Q1	0.31%
Cost	Rent arrears & collection	Total CPP	£92	£120	Q1	Q2	
Performance	Rent arrears & collection	Percentage of Rent collected %	100.41%	99.37%	Q1	Q2	97.44%
Cost	Resident Involvement	Total CPP	£19	£41	Q1	Q2	
Cost	Resident Involvement	Direct employees per 1000 props	0.33	0.64	Q1	Q2	
Performance	Resident Involvement	Views taken into account % (STAR)	74.9%	59.9%	Q1	no data	73.2%
Performance	Resident Involvement	Make views known % (STAR)	81.6%	65.4%	Q1	no data	74.3%
Performance	Responsive repairs	Satisfaction repairs service (STAR)	86.3%	74.2%	Q1	no data	80.3%
Cost	Total Housing M'ment	Total CPP	£325	£424	Q1	Q1	
Cost	Community investment	Total CPP	£33	£33	Q2	Q3	
Cost	Corporate	Finance Costs CPP	£42	£63	Q2	Q2	
Cost	Corporate	Direct revenue costs - finance costs %	2.30%	2.60%	Q2	Q2	
Cost	Corporate	Total Overheads CPP	£390	£413	Q2	Q2	
Cost	Corporate	Central Overheads CPP	£131	£158	Q2	Q2	
Cost	Corporate	IT & Comms CPP	£110	£117	Q2	Q3	
Performance	Corporate	Days lost through sickness per FTE	11.9	11.9	Q2	Q2	11.7
Cost	Estate Services	Direct employees per 1000 props	0.81	0.94	Q2	Q2	
Cost	Estate Services	Total CPP	£137	£151	Q2	Q2	
Performance	Estate Services	Satisfaction with n'hood (STAR)	79.9%	79.3%	Q2	no data	72.8%
Cost	Lettings	Total CPP	£41	£61	Q2	Q2	
Cost	Lettings	Direct employees per 1000 props	0.84	0.92	Q2	Q2	
Performance	Lettings	Average re-let time (major works) days	87.2	87.2	Q2	Q2	81.3
Performance	Lettings	Average re-let time (all re-lets) days	46.2	53.4	Q2	Q2	39.2
Performance	Lettings	Average re-let time in days (standard)	33.7	42.4	Q2	Q2	26.7
Performance	Lettings	Dwellings vacant & available to let %	0.47%	0.80%	Q2	Q2	0.71%
Performance	Major Works	Average SAP rating	70.5	70.8	Q2	Q3	70.7
Cost	Rent arrears & collection	Direct employees per 1000 props	1.81	1.84	Q2	Q2	
Performance	Rent arrears & collection	Current rent arrears %	2.53%	3.30%	Q2	Q2	2.71%
Performance	Resident Involvement	RI in consultation groups %	8.00%	4.20%	Q2	Q3	n/a 22/23
Cost	Responsive repairs	Total CPP	£623	£631	Q2	Q3	
Performance	Responsive repairs	Appointments kept % of apps made	97.20%	97.10%	Q2	Q1	96.67%
Performance	Responsive repairs	Emergency repairs as % of all resp repairs	17.30%	30.30%	Q2	Q1	36.95%
Performance	Responsive repairs	Repairs completed at the first visit %	92.90%	90.90%	Q2	Q3	94.80%
Cost	Tenancy Management	Total CPP	£110	£137	Q2	Q2	
Cost	Tenancy Management	Direct employees per 1000 props	1.96	1.98	Q2	Q2	
Performance	Tenancy Management	Average days to respond to complaints	10	10.6	Q2	Q2	n/a 22/23
Performance	Tenancy Management	Tenancy turnover	5.91%	6.28%	Q2	Q3	6.01%
Cost	Total Housing M'ment	Direct employees per 1000 props	5.98	6.12	Q2	Q2	
Cost	Void repairs	Average cost of void repair £	£3,106	£3,378	Q2	Q2	
Cost	Void repairs	Total CPP	£223	£280	Q2	Q2	

Cost / Perf	Service area	Performance Indicator Description	21/22	21/22 Peer	21/22	20/21	22/23
			Outturn	Median	Peer	Peer	
					Quartile	Quartile	
Cost	Anti Social Behaviour	Total CPP	£64	£58	Q3	Q2	
Cost	Anti Social Behaviour	Direct employees per 1000 props	1.05	0.88	Q3	Q3	
Performance	Anti Social Behaviour	ASB cases per 1,000 properties	77	58	Q3	Q4	72
Cost	Community investment	Direct employees per 1000 props	0.59	0.51	Q3	Q4	
Performance	Community investment	Residents undertaking training or education	30	116	Q3	Q2	58
Performance	Community investment	Residents supported into employment	51	54	Q3	Q3	39
Performance	Community investment	Households provided with money advice	955	957	Q3	Q2	328
Cost	Corporate	Direct revenue costs - total overheads %	21.40%	19.20%	Q3	Q3	
Cost	Corporate	HR CPP	£54	£40	Q3	Q2	
Cost	Corporate	Overheads as % of Revenue costs	21.40%	19.20%	Q3	Q3	
Cost	Corporate	Direct revenue costs - IT&comms costs %	6.00%	5.50%	Q3	Q3	
Cost	Corporate	Premises costs CPP	£52	£44	Q3	Q3	
Cost	Corporate	Direct revenue costs - premises costs %	2.90%	1.80%	Q3	Q3	
Performance	Rent arrears & collection	% of rent paid by HB	37.10%	35.40%	Q3	Q3	34.69%
Performance	Rent arrears & collection	Former tenant arrears %	1.83%	1.58%	Q3	Q3	1.60%
Performance	Rent arrears & collection	UC tenants in arrears %	57.64%	55.02%	Q3	Q3	59.62%
Performance	Rent arrears & collection	Non- UC tenants in arrears%	20.46%	18.65%	Q3	Q3	19.78%
Performance	Responsive repairs	Average cost of responsive repair £	£156	£152	Q3	Q2	
Cost	Responsive repairs	Ave. responsive repairs per prop.	3.3	3.2	Q3	Q4	3.7
Performance	Tenancy Management	% of complaints responded to target	66.30%	79.30%	Q3	Q3	70.89%
Performance	Anti Social Behaviour	Satisfaction with case handling %	54.50%	69.20%	Q4	no data	59.00%
Performance	Anti Social Behaviour	Satisfaction with case outcome %	49.40%	70.20%	Q4	no data	56.70%
Cost	Corporate	Direct revenue costs - HR %	3.00%	1.90%	Q4	Q4	
Cost	Corporate	Direct revenue costs - central o'heads%	7.20%	7.10%	Q4	Q3	
Cost	Corporate	Overheads as % of turnover	16.40%	10.70%	Q4	Q4	
Cost	Cyclical Maintenance	Direct employees per 1000 props	2.57	0.82	Q4	Q4	
Cost	Major Works	Direct employees per 1000 props	6.37	0.04	Q4	Q4	
Performance	Rent arrears & collection	Write offs %	0.70%	0.37%	Q4	Q1	0.52%
Cost	Responsive repairs	Direct employees per 1000 props	8.3	4.5	Q4	Q3	
Performance	Tenancy Management	Evictions	0.08%	0.04%	Q4	no data	0.12%
Cost	Void repairs	Direct employees per 1000 props	3.61	1.62	Q4	Q4	



# **ST LEGER HOMES OF DONCASTER LIMITED**

## **VALUE FOR MONEY (VFM)**

### **STATEMENT**

#### **FINANCIAL YEAR ENDED**

**31 MARCH 2022**

*“Providing homes in neighbourhoods that people are proud to live in”*

*Our strategic objectives :*

- 1 Ensure all our homes are modern, decent and energy efficient;*
- 2 Support our tenants to lead successful and fulfilling lives;*
- 3 Be a nationally recognised housing services provider; and*
- 4 Deliver the aims of Doncaster Growing Together through innovation and partnership.*

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**Appendix A : Benchmarking Quartiles by service area**

## 1. Executive Summary

- 1.1. The most simple definition of VFM is “**getting your money’s worth**”. It is not necessarily about buying the cheapest, it is about getting the most out (performance) from what you put in (cost).
- 1.2. It is about ensuring our customers obtain maximum benefit from the resources available. St Leger Homes of Doncaster (St Leger) therefore defines VFM as: “**Achieving the best balance between service cost and the benefit to the customer and business**”.
- 1.3. There are many other definitions for VFM – academic and informal – two of which are relevant here; “getting more for the same” and “the same for less”.
- 1.4. Both phrases should be considered throughout this statement as there are examples in 2021/22, but aren’t easy to quantify. Inputs for 2021/22 were generally the same, or less in some areas, as in 2020/21, but comparing outputs is not straightforward due to Covid constraints.
- 1.5. Operationally, 2021/22 was about returning to pre pandemic core services, to develop and implement a new integrated housing management system, further rollout of Universal Credit (UC), Building Safer Futures consultation and social housing White Paper requirements.
- 1.6. Doncaster has the lowest rents within South Yorkshire, and 9<sup>th</sup> lowest of all Housing Revenue Accounts (HRAs), which drives our management fee income and therefore provides many budget challenges to the services we strive to deliver.
- 1.7. Performance against a suite of challenging targets was again good or improving in a number of areas. Staffing levels have largely stayed the same and we again operated within budgets. The statement expands on this by looking at cost and performance by service and how these compare with other organisations (benchmarking).
- 1.8. Benchmarking is a key element of assessing VFM. For 2021/22, this was positive overall with more cost and performance indicators in the upper quartiles (above median). We also have improved VFM dashboards when benchmarked with our peers (20 organisations – ALMOs, Metropolitan Boroughs and Unitary Authorities) and also all housing providers nationally (90 organisations). (see Section 10 below).
- 1.9. This benchmarking work shows that **St Leger is a low cost, high performing organisation**.
- 1.10. It also shows the areas of good performance and also some areas for improvement or further investigation, which will be followed up and acted on. **Appendix A** details 80+ cost and performance indicators and how we compare with our peers.
- 1.11. ‘Social Value’ as a concept has had an increasing profile in recent years and actions appear in the 2022 updated VFM strategy. We have always considered social value in the form of social accounts and annual social statements. The latter has been included as an appendix to the VFM statement and the increased social work ongoing or planned will be included within VFM statements. Our Social Statement for 2021/22 is attached at **Appendix B**.

## 2. VFM environment

- 2.1. St Leger has again followed the Regulator for Social Housing framework in producing this document. The VFM Standard states that a registered housing provider must clearly articulate its strategic objectives and have an approach agreed by board to achieving VFM in meeting these objectives. <https://www.gov.uk/guidance/regulatory-standards>
- 2.2. St Leger is income led, receiving management fees to manage and maintain Doncaster Council’s (DC) housing related assets; around 20,000 homes, 100 shops, 2,000 garages and sites and some Housing Revenue Account (HRA) land, and a number of other key housing services. It is therefore imperative that St Leger achieves VFM in all of its activities.

- 2.3. Annual management fee incomes for 2021/22 only increased in relation to specific cost of living awards, pay scale increments, pension cost increases, growth/specifically approved elements, and therefore robust budgetary control was required and achieved in the year.
- 2.4. 2021/22 was the third year of the five year corporate plan and everything we do is linked to its four objectives:
- 1 Ensure all our homes are modern, decent and energy efficient;**
  - 2 Support our tenants to lead successful and fulfilling lives;**
  - 3 Be a nationally recognised housing services provider; and**
  - 4 Deliver the aims of Doncaster Growing Together through innovation and partnership.**
- 2.5. A balanced scorecard of priorities and targets were developed for each strategic objective and agreed with Doncaster Council (DC) to reflect plans and risks. Each of the above objectives has performance measures which are detailed below.
- 2.6. An Annual Development Plan (ADP) and a suite of annual Key Performance Indicator (KPIs) for the year is also approved, based on our strategic objectives and Mayoral priorities. Key themes for 2021/22 were :
- building and fire safety regulations;
  - digital transformation;
  - agile working;
  - tenancy sustainability;
  - allocation policies;
  - improving communications with tenants and residents;
  - stock condition information, investment and making best use of DC's assets;
  - improving customer access and engagement;
  - delivering the Environmental strategy;
  - an efficient and effective repairs and maintenance service;
  - reducing and preventing homelessness;
  - reducing the number of empty properties; and
  - a positive health, safety and wellbeing culture.
- 2.7. Our VFM strategy has been in place since 2018 and is being updated in 2022. The existing strategy contains six objectives :
- **Culture** : maximise staff involvement in VFM and embed a VFM culture;
  - **Customers** : maximise customers, leaseholders and stakeholders' VFM engagement;
  - **Comparison** : expand the performance management framework and benchmarking;
  - **Communication** : improve the quality, range and use of VFM reporting;
  - **Commercial**: ensure best use of all assets for which St Leger is responsible; and
  - **Collaboration** : strengthen the role of Support Services to the business.
- 2.8. The updated strategy for 2022 has revised but very similar objectives :
- **Commercially aware**: enable DC to make best use of all assets which SLHD manage;
  - **Customers** : maximise customers, leaseholders and stakeholders' VFM engagement;
  - **Culture** : maximise staff involvement in VFM and embed a VFM culture; and
  - **Collaboration** : be an efficient and effective provider of, or contributor to, services to residents and stakeholders of the borough
- 2.9. We validate our performance with employee and customer surveys and we actively benchmark our services with other organisations. As in previous years, the main method of benchmarking is through our membership of Housemark (see Section 10 below), but we also carry out more tailored benchmarking with specific organisations.

## **COSTS AND PERFORMANCE**

### **3. Operations**

- 3.1. Core services were delivered fully during 2021/22, following the Covid19 disruptions and restrictions in both 2019/20 and 2020/21. A number of areas had been adversely affected by the disruptions and 2021/22 focussed on returning performance to pre-pandemic levels.
- 3.2. The main project in the year was the continued, company-wide implementation of a new integrated housing management ICT system, with Phase 2 going live in October 2021 after the first phase going live in November 2020. The successful implementation means the new system will mean more efficient and effective ways of working and improved services to customers.

### **4. Company performance - Costs**

- 4.1. As stated above, annual management fee incomes for 2021/22 only increased in relation to specific cost of living awards, pay scale increments, pension cost increases, and growth/specifically approved elements. Therefore robust budgetary control was required, and achieved, in the year.
- 4.2. Detailed budget reports are presented monthly to EMT and quarterly to Board or Audit Committee, containing explanations of variances to budget, key risks and actions taken and commentary from Heads of Service as budget holders.
- 4.3. Comparing 2021/22 spend levels with the previous year is not easy as the majority of Quarter 1 (April to June) in 2020/21, plus several other periods in that year, were in various states of lockdown, reducing outputs.
- 4.4. At the highest level employee numbers (WTEs) for both years were virtually the same, and with a small increase in agency numbers in 2021/22, so inputs in terms of employee resources were broadly the same.
- 4.5. So at this highest level, increased activity (outputs) in 2021/22 will indicate VFM and this was the case in most areas. The commentary in the various sections below expands on this.

### **5. Company performance - Key Performance Indicators (KPIs) and Service Standard**

- 5.1. A suite of challenging targets were set as KPIs. These are reported monthly, quarterly or annually to numerous groups, including Heads of Service, EMT, Committees, Board and to DC, and on our website. In addition weekly schedules of a selection of KPIs are published to all employees, the Board and to DC.
- 5.2. The table below summarises whether or not the KPIs were met, with comparatives.

	<b>21/22</b>	20/21	19/20
Green (meeting target)	<b>7</b>	8	10
Amber (within tolerance)	<b>4</b>	2	4
Red (not meeting target)	<b>5</b>	7	4
No target (homelessness)	<b>3</b>	0	0
Total	<b>19</b>	17	18

- 5.3. Although some targets were not met, 13 of the 19 indicators had improved or maintained on the performance from the previous year.
- 5.4. The detailed KPIs are reported and commented on within the separate corporate objectives sections they relate to below, whether targets were met and with comparatives from previous years.

## CORPORATE OBJECTIVES

### 6. OBJECTIVE 1 : ALL OUR HOMES ARE MODERN, DECENT AND ENERGY EFFICIENT

- 6.1. The objective has a number of cross cutting measures, including
- Percentage of homes maintaining Decent Homes standard
  - Repairs completed at first visit
  - Gas servicing percentage of properties attended
  - Number of properties managed
  - Level of tenant satisfaction with property condition
  - Energy efficiency of properties

6.2. The table below summarises the **related KPIs** for 2021/22 and comparatives :

KPI	KPI description	Trend	21/22 Outturn	21/22 Target	20/21 Outturn	19/20 Outturn
9	Repairs – First visit complete	↓	90.2%	92.0%	90.9%	90.2%
10	Gas servicing - % of properties attended	↔	100.0%	100.0%	100.0%	100.0%
16	Homes meeting Decent Standard	↔	99.99%	100.00%	99.99%	100.00%
17	Tenant satisfaction with property condition	↓	86.5%	89.0%	89.4%	89.4%
18	Energy efficiency of properties	↑	70.3%	68.0%	64.7%	n/a

Keys :

Target met/exceeded	Within tolerance	Target not met
---------------------	------------------	----------------

- ↑ Improving trend
- ↓ Deteriorating trend
- ↔ Unchanged performance

#### Achievements in year

- 6.3. St Leger managed and maintained DC's housing and related stock also effectively managed £18.5m of DC's £24.2m capital programme, and £9m of this was delivered by the St Leger in-house tradesteam. These were higher than in 2020/21 but from similar levels of resource.
- 6.4. Operational performance was strong with all KPIs either meeting or within tolerance of targets. Significant in roads were made in addressing backlogs arising for the Covid disrupted services from 2020/21.
- 6.5. Investment in the housing stock continued to sustain and further enhance decency works already carried out. The programme included an external improvement scheme, heating conversions and upgrades, estate works and structural repairs.
- 6.6. The year again saw continued investment in building safety compliance works.
- 6.7. As well as our programme of capital works we carried out responsive repair work and cyclical testing of heating and electrics to ensure the continued maintenance of our housing stock. We also continued our External Wall Insulation (EWI) programme in the year and secured external funding towards this. We operated a 24/7 contact service.
- 6.8. A Repairs Excellence Project commenced at the end of 2021/22 aimed at identifying and implementing efficiencies in all repairs processes. This will generate operational improvements and cash savings going forward.
- 6.9. A stock condition surveying programme also commenced in 2021/22 and results will be used as part of the long term investment planning, leading to improved decency and energy efficiency performance of housing stock.

## 7. **OBJECTIVE 2 : OUR TENANTS LIVE SUCCESSFUL AND FULFILLING LIVES**

7.1. The objective has a number of cross cutting measures, including :

- Number of tenants involved
- Improvements made due to tenant involvement
- Tenancies sustained
- Rent arrears
- Percentage of ASB cases resolved
- Tenant satisfaction levels
- Number of tenants and residents helped into training and employment

7.2. The table below summarises the **related KPIs** for 2021/22 and comparatives :

KPI	KPI description	Trend	21/22 Outturn	21/22 Target	20/21 Outturn	19/20 Outturn
1	Current rent arrears % against annual rent	↑	2.55%	3.00%	2.75%	2.79%
8	Tenancies sustained post support	↑	98.3%	90.0%	97.3%	93.8%
13	Anti-Social Behaviour % of resolved cases	↑	97.6%	95.0%	95.2%	95.6%
15	Tenant satisfaction overall	↓	84.8%	89.0%	87.0%	87.0%

### **Customer Service Standards**

7.3. To complement our corporate KPIs, St Leger has developed Service Standards with our customers. These take into account our Corporate Plan, KPIs and the Regulator's Consumer Standard, to ensure our customers are clear about the levels of service they can expect from us and we are clear about what we need to deliver.

7.4. The standards are reviewed periodically and approved by EMT and Board. Performance against the standards is monitored by EMT and Performance and Improvement Committee on a quarterly basis, with actions generated to improve performance.

7.5. For 2021/22, there were 15 measures across seven standards, covering the following areas for customers:-

- Helpful, friendly and polite staff and contractors;
- Being treated with respect and decency;
- Feeling safe in their home;
- Knowledgeable staff dealing with enquiries efficiently and effectively;
- Easy to contact us by their preferred method;
- Convenient appointments; and
- Getting the service right.

7.6. The table below summarises our performance for the past five years :

Service standards	21/22	20/21	19/20	18/19
Compliant with target	6	7	8	8
Within target tolerance	3	1	3	2
Not compliant with target	6	3	2	3
Total	15	11	13	13

7.7. The areas where we weren't meeting target were:

- Increasing the number of tenants in the Get Involved Group (GIG);
- Resolve/respond to enquiries, compliments and complaints within 10 working days; and
- Answering calls within 20 seconds.

7.8. Our Service Standards will be reviewed again in 2023/24 in light of the introduction of new Tenant Satisfaction Measures under the Social Housing White Paper requirements.

## Satisfaction surveys

- 7.9. The main customer survey is an annual Survey of Tenants and Residents (STAR). Results from the July 2021 survey are summarised below. Results of all providers across the country also fell, and St Leger remains in the upper quartiles compared to our peers and nationally for the main core questions. (see benchmarking section below)

Core satisfaction survey question	2021/22	2019/20	2017/18	2016/17	2015/16	2014/15
Overall satisfaction	<b>84.8%</b>	87.0%	88.8%	91.0%	91.8%	90.9%
Quality of your home	<b>86.5%</b>	89.4%	89.2%	92.7%	93.2%	92.1%
Neighbourhood as a place to live	<b>79.9%</b>	81.2%	81.3%	89.9%	90.8%	91.4%
Rent provides value for money	<b>n/a</b>	94.2%	92.8%	93.6%	93.4%	92.2%
Repairs and maintenance	<b>86.3%</b>	90.1%	85.9%	89.4%	89.5%	88.8%
Listens to views and acts on them	<b>74.9%</b>	83.1%	83.5%	85.8%	86.8%	85.9%

## **Achievements in year**

- 7.10. Customers will be the ultimate beneficiaries from all VFM work. St Leger is committed to providing suitable homes, maintaining independence, tackling social and financial exclusion and empowering people to have a better quality of life
- 7.11. Operational performance was strong with all KPIs either meeting or within tolerances of targets, and from similar levels of resource from the previous year.
- 7.12. 2021/22 was another difficult year as we continued to address numerous challenges, where we saw approximately 25% more tenants on UC this year than last, the continued implementation of a new housing management IT system and the majority of staff working mainly from home for most of the year due to Covid19.
- 7.13. Full roll-out of UC continued in 2021/22, now affecting nearly 8,000 St Leger Homes tenants and equating to over £24million of income per annum. For 2021/22, we collected nearly £2million more rent in UC than the previous financial year.
- 7.14. It is pleasing to report that current rent arrears performance out-turned at 2.55% against the year-end target of 3.00%, and is the lowest level since March 2017 (2.44%). The five year period since then has seen UC roll out fully across the borough, Brexit and the Covid19 pandemic, with the latter bringing with it many restrictions
- 7.15. The Board approved a new Customer Voice strategy (previously Customer Involvement) to further strengthen our outcome focussed customer involvement structure. We have undertaken a full review of tenant engagement operations and work in our neighbourhoods continued extensively in the year.
- 7.16. Considerable focus on voids was again applied in the year to improve turn around and re-let times. This improved slowly throughout the year (and continues in 2022/23). We aim to ensure properties are empty for as short a period as possible as this has a positive impact on neighbourhoods, reducing anti-social behaviour (ASB) and crime, as well as having a positive impact on rental income



## 8. **OBJECTIVE 3 : BE A NATIONALLY RECOGNIED PROVIDER OF HOUSING SERVICES**

- 8.1. The objective has a number of cross cutting measures, including
- Number of standard void re-let days
  - Percentage of complaints upheld against interactions
  - Staff sickness absence levels
  - Proportion of invoices paid on-time
  - Rent loss from empty properties
  - Compliance with ISO45001 health and safety management system
  - Health & Safety outcomes
  - Our performance against comparable organisations (**Benchmarking \***)

8.2. **\* Benchmarking is a key element of meeting this objective and assessing VFM, so a separate section appears at Section 10 below, summarising the extensive work undertaken in this area.**

8.3. The table below summarises the **related KPIs** for 2021/22 and comparatives :

KPI	KPI description	Trend	21/22 Outturn	21/22 Target	20/21 Outturn	19/20 Outturn
2	Void rent loss % of annual rent	↑	0.79%	0.50%	1.00%	0.59%
3	Average no. of days to re-let a property	↑	33.7	20.0	46.1	22.7
7	Complaints upheld as a % of interactions	↓	0.13%	0.07%	0.07%	0.06%
11	Days lost through sickness per FTE	↓	11.9	7.9	6.6	8.22
20	Employee satisfaction SLHD as an employer	n/a	83%	80%	n/a	n/a
21	Recommending SLHD to family and friends - Tenant survey Net Promoter Score	n/a	47	25	n/a	n/a
22	Recommending SLHD to family and friends – Employee survey Net Promoter Score	n/a	-7	25	n/a	n/a

### **Achievements in year**

#### KPIs

- 8.4. Voids performance was worse than target throughout the year for both void rent loss and re-let times, as we continue to recover from the impact of Covid restrictions from the previous year. However, performance improved as the year progressed and a number of indicators were above median when benchmarked. Improving performance continued into 2022/23 as we aim to get to pre-pandemic levels.
- 8.5. Complaint levels increased significantly during the year and this received increased focus as the year progressed to understand the reasons why and to take appropriate action.

#### People

- 8.6. We achieved reaccreditation for the Government Standard for Customer Service Excellence (CSE) for the twelfth year running - awarded for demonstrating focus on the needs and preferences of their customers.
- 8.7. St Leger's main offices re-opened in mid 2021/22 and an agile working project enabled office based staff to move to a mix of home and office working. Agile working has led to reduced use/need of premises, which will mean savings on rent and utilities going forward, plus travel time and cost for employees and improving our carbon footprint.
- 8.8. The results from three more employee pulse surveys, which focussed on employee wellbeing, were used to inform St Leger's agile working approach and lead the implementation of policy change and associated guidance and learning, and facilitate plans to embed the new ways of working.

- 8.9. There were further realignments in the year and also strengthening of certain teams, all of which improved or will improve operational efficiency.
- 8.10. St Leger Homes again achieved the maximum five star rating in the British Safety Council's Occupational Health and Safety Audit scheme for the last eleven years and retained accreditation to the international ISO45001 health and safety standard during 2021/22.
- 8.11. Following achievement of the Silver level in the Public Health Bewell@Work Award in 2019/20, we continued our wellbeing activity throughout 2021/22 and working towards achieving Gold.
- 8.12. The number of RIDDOR reportable injuries reduced in the year and a full evaluation of health and safety performance is provided to Board on a regular basis.
- 8.13. St Leger Homes has a strong safeguarding culture and are a member of both the Adult & Children Safeguarding Boards and play an important role with strategic partners across Doncaster.
- 8.14. In addition, we increased activity as members of other partnership panels and boards, including the Health and Wellbeing Board, the Doncaster Integrated Care Partnership Board and also the Multi-Agency Risk Management Arrangements Conference (MARAC).
- 8.15. Considerable work took place in 2021/22 to enable SLHD to become an accredited member of the Domestic Abuse Housing Alliance ( DAHA).

### Systems

- 8.16. The main systems project was the new integrated housing management ICT system, with Phase 2 going live in October 2021 after the first phase going live in November 2020. The successful implementation means the new system will mean more efficient and effective ways of working and improve services to customers.
- 8.17. The new system rationalises a number of separate systems to give a much more comprehensive and efficient single view of a tenant and will also deliver cost savings around software licencing.
- 8.18. There has also been investment in other software and also in server architecture and equipment for agile working, all of which will generate operational efficiencies.
- 8.19. The Business Intelligence Tool ('Qlik') continued to be developed in the year and interrogates core systems, providing timely and accurate performance information to Managers across the business.

### Procurement

- 8.20. St Leger's Procurement arrangements were merged with DC's late in the year to give operational and purchasing synergies.
- 8.21. Industry standard Schedule of Rate (SORs) from the National Housing Federation (NHF) were implemented in 2021/22 and ensure our in-house works are charged appropriately, enable effective performance monitoring and allow accurate benchmarking with external suppliers to ensure VFM is achieved with suppliers.
- 8.22. 'Social Value' assessments, which were introduced in 2020/21, ensure 10% of all contract assessments are based on the social value of the contract. These consider factors such jobs created, carbon footprint, community groups and local expenditure, and Targets/Outputs/Measures (TOMs) are built in to every contract.

## **9. OBJECTIVE 4 : THROUGH INNOVATION AND PARTNERSHIP WORKING WE WILL DELIVER THE AIMS OF DONCASTER GROWING TOGETHER**

- 9.1. The objective has a number of cross cutting measures, including
- Number of households in “bed and breakfast”
  - Number of homelessness acceptances
  - Number of homelessness preventions
  - Proportion of our expenditure spent in Doncaster
  - Recognition for our contribution to a growing and successful Doncaster
  - Public sector apprenticeship target
  - Contribution to partnerships
  - Customer Involvement evaluation
  - World of Work participation rates and outcomes

9.2. The table below summarises the related KPIs for 2021/22 and comparatives :

KPI	KPI description	Trend	21/22 Outturn	21/22 Target	20/21 Outturn	19/20 Outturn
4	Households placed in B&B accommodation	↑	787	n/a	831	84
5	Full Duty homelessness acceptances	↑	384	n/a	398	228
6	Homeless preventions	↓	566	n/a	604	965
12	Percentage of local expenditure	↑	73%	70%	71%	n/a
14a	Tenants & residents undertaking training	↔	30	56	30	53
14b	Tenants & residents into employment	↑	51	25	28	31

### Achievements in year

- 9.3. The three homelessness related KPIs didn't have targets in the past two years due to the influences of Covid, but 2021/22 saw improved performance in two of the KPIs and similar levels in the third. The other three KPIs related to this Corporate Objective showed improved or maintained performance.
- 9.4. We recognise that we maximise our effectiveness through joint working, and have increased, effective partnerships with numerous partnering organisations, in particular DC, DWP, CAB, and Community First Credit Union and Doncaster Financial Inclusion Group (FIG) to deliver solutions to our tenants. We also work closely with 24 Tenants and Residents Associations (TARAs).
- 9.5. St Leger has a proactive approach to anti-social behaviour and we continued to work effectively with our partners via the Doncaster Safer Partnership.
- 9.6. We attended monthly Neighbourhood Action Groups and Case Identification Meetings across the borough. As well as low level enforcement and support we successfully carried out enforcement sanctions on Notice of Seeking Possessions (Secure Tenancies), Notice of Possession Proceedings (Introductory Tenancies), Injunctions, Demoted Tenancy Orders, Evictions and Closure Orders.
- 9.7. Addressing homelessness is one of the key priorities of Doncaster Growing Together, and therefore within our Corporate Plan, ADP and SDPs. We work very closely with the Complex Lives (CL) Alliance, including DC, NHS and Children's Services, to support vulnerable Doncaster residents.
- 9.8. Successful bids to Government in recent years for funding initiatives such as the Protect and Vaccinate Fund, Rapid Rehousing Pathway, Vulnerable Renters Fund and Rough Sleeper Initiative, secured funding in 2021/22 and this provided much needed resources and capacity to the service in their work towards addressing homelessness in Doncaster.
- 9.9. Our Tenants and Residents Improvement Panel (TRIP) undertake a number of tasks and reviews each year to inform service improvements. TRIP play a key role in our work on consultation, customer engagement, mystery shopping and reality checking.

### 10. BENCHMARKING – how we compare with others

- 10.1. We actively benchmark our services, because a key element of being able to evidence VFM is how we compare with other organisations.
- 10.2. The main method of benchmarking is through our membership of Housemark. One outcome is the grading our costs and performance into four bands “quartiles”, ie Quartile 1 for top performers or lowest cost, etc. We submit performance information quarterly and more comprehensive performance information on annual basis, together with detailed financial analysis (see below).
- 10.3. We also carry out more tailored benchmarking with specific organisations, where appropriate. This was limited in 2021/22 but some benchmarking was undertaken involving:
  - Universal Credit (UC) – working with the DWP national policy team;
  - Income Management (IM) – participation in a regional (northern) benchmarking group;
  - Income Management (IM) – talking to other organisations to review systems;
  - Part of the National Early Adopter programme for High Rise Buildings (HRRB);
  - Participated in a regional health, safety and compliance benchmarking group; and
  - Member of a national Former Tenant Arrears forum.

## HOUSEMARK

- 10.4. The benchmarking information from Housemark for 2021/22 compares our performance to a peer group of around 20 ALMOs, Metropolitan Boroughs, Unitary authorities and similar organisations, and also around 90 housing providers nationally.
- 10.5. All benchmarking results must consider that differences exist between housing providers – size, geography, demographic, timing, etc. - and should serve as an introduction for further investigation and detailed discussions.
- 10.6. In summary, benchmarking information for 2021/22 shows our strongest performance to date, indicating that we are **a low cost, high performing organisation**.
- 10.7. This is summarised below and further details of benchmarked cost and performance indicators are attached at **Appendix A**.

### Housemark - VFM 'dashboard'

- 10.8. At an overview level, VFM 'dashboards' can be produced by plotting a selection of cost and performance indicators in a 2x2 matrix to show how an organisation compares with its peer group, geographically or nationally, for core service areas.
- 10.9. The aim is to have as many indicators as possible in the low cost, high performance green area and as few as possible in the high cost, poor performance red area (see below).
- 10.10. The dashboard is intended to give a VFM snapshot and generate further investigation. The tables below shows the cost and performance indicators selected with the dashboards for 2021/22 and comparatives for 2020/21, for both our Peer Group and Nationally.

**PEER GROUP VFM DASHBOARDS**

Key	Service	Cost indicator	Performance indicator
1	Responsive repairs	CPP * of responsive repairs	STAR satisfaction with repairs service
2	Void repairs and lettings	CPP of void repairs	Void rent loss %
3	Rent arrears & collection	CPP of rent arrears & collection	Current arrears %
4	Tenancy Management	CPP of tenancy management	STAR satisfaction with service overall
5	Customer involvement	CPP of customer involvement	STAR satisfaction with views being listened and acted
6	Customer services	CPP of housing management	Average days to respond to complaints
7	Neighbourhood m'ment	CPP of estate services	STAR satisfaction with neighbourhood as place to live
8	Community investment	CPP of community investment	Residents supported into employment

\* CPP = Cost Per Property

**Peer group 2021/22 - 20 ALMOs, Metropolitan Boroughs and Unitary authorities**



**Peer group 2020/21 - 25 ALMOs, Metropolitan Boroughs and Unitary authorities**



Key	Service	Cost indicator	Performance indicator
1	Responsive repairs	CPP * of responsive repairs	STAR satisfaction with repairs service
2	Void repairs and lettings	CPP of void repairs	Void rent loss %
3	Rent arrears & collection	CPP of rent arrears & collection	Current arrears %
4	Tenancy Management	CPP of tenancy management	STAR satisfaction with service overall
5	Customer involvement	CPP of customer involvement	STAR satisfaction with views being listened and acted
6	Customer services	CPP of housing management	Average days to respond to complaints
7	Neighbourhood m'ment	CPP of estate services	STAR satisfaction with neighbourhood as place to live
8	Community investment	CPP of community investment	Residents supported into employment

\* CPP = Cost Per Property

**Nationally 2021/22 – approx. 90 housing providers**



**Nationally 2020/21 – approx. 120 housing providers**



## Housemark - Cost and Performance indicator quartile summaries

10.11. The tables below show the banding of our quartile positions for all cost and all performance indicators submitted for the last three years. Over the past five years, small majorities of our Cost (~60%) and Performance (~60%) indicators are in Quartiles 1 and 2:

<b>COST</b>	<b>21/22</b>		20/21		19/20	
	no.	%	no.	%	no.	%
Quartile 1	6	15	2	6	9	28
Quartile 2 / Median	17	43	19	56	10	31
Quartile 3	10	25	8	24	7	22
Quartile 4	7	17	5	14	6	19
Totals	40	100	34	100	32	100

<b>PERFORMANCE</b>	<b>21/22</b>		20/21		19/20	
	no.	%	no.	%	no.	%
Quartile 1	14	33	9	28	15	47
Quartile 2 / Median	14	33	8	27	7	22
Quartile 3	11	25	10	30	6	19
Quartile 4	4	9	5	15	4	12
Totals	43	100	34	100	32	100

10.12. All Quartile 3 and 4 indicators will again be reviewed to understand why these positions were achieved and put actions in place to move us into the higher quartiles.

### Housemark - Optimising service costs

10.13. Total expenditure is analysed into Housemark service areas to give headline and detailed costs per service. The table below summarises our headline **costs per property (CPP)** together with comparatives and peer and national group benchmarks from Housemark.

Cost Category	18/19 Outturn CPP £	19/20 Outturn CPP £	20/21 Outturn CPP £	21/22 Outturn CPP £	Peer Median CPP £	Peer Quartile	National Quartile
<u>Repairs</u>							
Major Works	1,815	1,134	1,101	971	1,469	↑Q1	↑Q1
Cyclical Maintenance	129	127	138	141	312	Q1	Q1
Responsive Repairs	571	571	583	622	631	↑Q2	Q2
Void Works	200	193	214	223	280	Q2	Q2
<u>Housing</u>							
Rent arrears collection	76	78	88	92	120	↑Q1	Q1
Resident Involvement	14	16	19	19	41	↑Q1	Q1
Tenancy Management	89	90	104	110	137	Q2	Q2
Lettings	30	36	39	41	61	Q2	Q1
Anti Social Behaviour	56	58	62	64	58	↓Q3	↓Q3
Estate Services	115	128	130	137	179	Q2	Q2
Housing – total	380	406	442	463	596	Q2	Q1
<b>Total Cost Per Property</b>	3,095	2,431	2,478	2,420	2,774		

Overheads are allocated by Housemark into each service categories

↑ ↓ arrows indicate any quartile movements compared to 2020/21

## **11. Plans for 2022/23 onwards**

- 11.1. Operationally, as with 2021/22, one of St Leger's main plans for 2022/23 onwards is to conclude the implementation and embed the new integrated housing management system, and deliver its projected efficiency savings. This new system is central to VFM gains going forward. It replaces a number of separate systems to give one view of a customer and therefore much more efficient processes for employees, service benefits for our customers, and will change the way everyone works across the company.
- 11.2. Financially, DC have set St Leger a £1m budget savings target over a three year period, commencing in 2022/23. Operating within reduced budgets will force process improvements and efficiencies, and maintaining the high performance levels and meeting targets will further evidence VFM.
- 11.3. The cost of living crisis – utilities, fuel, inflation, interest rates – will provide numerous challenges over the next couple of years. This will impact on SLHD costs and performance, and also for tenants as they try to manage their budgets.
- 11.4. Progression of the Social Housing White Paper provides additional challenges, not least the regulatory framework, part of which is the VFM standard, and also the recently published Tenancy Satisfaction Measures, and all of the requirements have been built in to plans from 2022/23 onwards.
- 11.5. The employee performance monitoring framework introduced in 2021/22 will continue to be developed along with a wider performance management framework that will monitor progress against a range of measures, including KPIs, PIs, budgets and governance actions (risk, internal audit).
- 11.6. Strategically, work has or will commence in 2022/23 on reviewing and updating the VFM strategy, done in November 2022, and also the Corporate Plan, which is due for renewal by March 2024.
- 11.7. In summary, the main priorities for 2022/23 are :
  - embed the new integrated housing management system;
  - develop the performance management framework and culture;
  - improve performance where targets are consistently not being met – primarily around voids, sickness and complaints;
  - deliver the required budget savings; and
  - develop the workforce.

## **12. Summary**

- 12.1. The 2021/22 financial year was a return to normality after the disruptions of 2020/21. Demand on all services was high and we had a higher number of vacant posts than anticipated. Performance overall was good, or with improving trends in most areas, and all were managed within a challenging budget. Staffing levels and budgets have stayed the same or reduced, except where there had been agreed cost or inflationary increases with DC.
- 12.2. Good progress was made with implementing the integrated housing management system and addressed the actions from building safer futures and social housing white paper requirements.
- 12.3. We continue to be a low cost, high performing organisation compared to other housing providers. This places us in a strong starting point going into 2022/23 as performance wise, our levels are generally equivalent or better than most, but again there are areas where our costs and performance could be improved, and our plans will improve our VFM performance.



**Housemark - Quartile position table – UPPER QUARTILES 1 and 2**

**APPENDIX A**

Service area	Indicator Description	21/22 Outturn	21/22 Peer Median	21/22 Peer Quartile	20/21 Peer Quartile
Corporate	Staff turnover in the year %	9.6%	11.8%	Q1	Q1
Corporate	Satisfaction overall (STAR)	84.8%	78.0%	Q1	no data
Corporate	Landlord is easy to deal with % (STAR)	85.4%	72.0%	Q1	no data
Corporate	Treats tenants fairly and with respect % (STAR)	90.9%	84.1%	Q1	no data
Cyclical Maintenance	Total CPP	£141	£292	Q1	Q1
Cyclical Maintenance	Gas servicing - % valid certificate	100.00%	99.99%	Q1	Q1
Cyclical Maintenance	% gas safety checks by annivers date	100.00%	99.88%	Q1	Q1
Lettings	Dwellings vacant unavailable to let %	0.04%	0.52%	Q1	Q1
Lettings	Void rent loss % of rent loss	0.81%	1.67%	Q1	Q1
Major Works	Total CPP	£971	£1,468	Q1	Q2
Major Works	Quality of your home (STAR)	86.5%	75.7%	Q1	no data
Major Works	Home is safe and secure % (STAR)	92.8%	80.4%	Q1	no data
Major Works	% of dwellings that are non-decent	0.01%	0.4%	Q1	Q1
Rent arrears & collection	Total CPP	£92	£120	Q1	Q2
Rent arrears & collection	Percentage of Rent collected %	100.41%	99.37%	Q1	Q2
Resident Involvement	Total CPP	£19	£41	Q1	Q2
Resident Involvement	Direct employees per 1000 props	0.33	0.64	Q1	Q2
Resident Involvement	Views taken into account % (STAR)	74.9%	59.9%	Q1	no data
Resident Involvement	Make views known % (STAR)	81.6%	65.4%	Q1	no data
Responsive repairs	Satisfaction repairs service (STAR)	86.3%	74.2%	Q1	no data
Total Housing M'ment	Total CPP	£325	£424	Q1	Q1
Community investment	Total CPP	£33	£33	Q2	Q3
Corporate	Finance Costs CPP	£42	£63	Q2	Q2
Corporate	Direct revenue costs - finance costs %	2.3%	2.6%	Q2	Q2
Corporate	Total Overheads CPP	£390	£413	Q2	Q2
Corporate	Central Overheads CPP	£131	£158	Q2	Q2
Corporate	IT & Comms CPP	£110	£117	Q2	Q3
Corporate	Days lost through sickness per FTE	11.9	11.9	Q2	Q2
Estate Services	Direct employees per 1000 props	0.81	0.94	Q2	Q2
Estate Services	Total CPP	£137	£151	Q2	Q2
Estate Services	Satisfaction with n'hood (STAR)	79.9%	79.3%	Q2	no data
Lettings	Total CPP	£41	£61	Q2	Q2
Lettings	Direct employees per 1000 props	0.84	0.92	Q2	Q2
Lettings	Average re-let time (major works) days	87.2	87.2	Q2	Q2
Lettings	Average re-let time (all re-lets) days	46.2	53.4	Q2	Q2
Lettings	Average re-let time in days (standard)	33.7	42.4	Q2	Q2
Lettings	Dwellings vacant & available to let %	0.47%	0.80%	Q2	Q2
Major Works	Average SAP rating	70.5	70.8	Q2	Q3
Rent arrears & collection	Direct employees per 1000 props	1.81	1.84	Q2	Q2
Rent arrears & collection	Current rent arrears %	2.53%	3.30%	Q2	Q2
Resident Involvement	RI in consultation groups %	8.0%	4.2%	Q2	Q3
Responsive repairs	Total CPP	£623	£631	Q2	Q3
Responsive repairs	Appointments kept % of apps made	97.2%	97.1%	Q2	Q1
Responsive repairs	Emergency repairs as % of all resp repairs	17.3%	30.3%	Q2	Q1
Responsive repairs	Repairs completed at the first visit %	92.9%	90.9%	Q2	Q3
Tenancy Management	Total CPP	£110	£137	Q2	Q2
Tenancy Management	Direct employees per 1000 props	1.96	1.98	Q2	Q2
Tenancy Management	Average days to respond to complaints	10.0	10.6	Q2	Q2
Tenancy Management	Tenancy turnover	5.91%	6.28%	Q2	Q3
Total Housing M'ment	Direct employees per 1000 props	5.98	6.12	Q2	Q2
Void repairs	Average cost of void repair £	£3,106	£3,378	Q2	Q2
Void repairs	Total CPP	£223	£280	Q2	Q2

**Housemark - Quartile position table – QUARTILES 3 and 4**

**APPENDIX A**

Service area	Indicator Description	21/22	21/22	21/22	20/21
		Outturn	Peer Median	Peer Quartile	Peer Quartile
Anti Social Behaviour	Total CPP	£64	£58	Q3	Q2
Anti Social Behaviour	Direct employees per 1000 props	1.05	0.88	Q3	Q3
Anti Social Behaviour	ASB cases per 1,000 properties	77	58	Q3	Q4
Community investment	Direct employees per 1000 props	0.59	0.51	Q3	Q4
Community investment	Residents undertaking training or education	30	116	Q3	Q2
Community investment	Residents supported into employment	51	54	Q3	Q3
Community investment	Households provided with money advice	955	957	Q3	Q2
Corporate	Direct revenue costs - total overheads %	21.4%	19.2%	Q3	Q3
Corporate	HR CPP	£54	£40	Q3	Q2
Corporate	Overheads as % of Revenue costs	21.4%	19.2%	Q3	Q3
Corporate	Direct revenue costs - IT&comms costs %	6.0%	5.5%	Q3	Q3
Corporate	Premises costs CPP	£52	£44	Q3	Q3
Corporate	Direct revenue costs - premises costs %	2.9%	1.8%	Q3	Q3
Rent arrears & collection	% of rent paid by HB	37.1%	35.4%	Q3	Q3
Rent arrears & collection	Former tenant arrears %	1.83%	1.58%	Q3	Q3
Rent arrears & collection	UC tenants in arrears %	57.64%	55.02%	Q3	Q3
Rent arrears & collection	Non- UC tenants in arrears%	20.46%	18.65%	Q3	Q3
Responsive repairs	Average cost of responsive repair £	£156	£152	Q3	Q2
Responsive repairs	Ave. responsive repairs per prop.	3.3	3.2	Q3	Q4
Tenancy Management	% of complaints responded to target	66.3%	79.3%	Q3	Q3
Anti Social Behaviour	Satisfaction with case handling %	54.5%	69.2%	Q4	no data
Anti Social Behaviour	Satisfaction with case outcome %	49.4%	70.2%	Q4	no data
Corporate	Direct revenue costs - HR %	3.0%	1.9%	Q4	Q4
Corporate	Direct revenue costs - central o'heads%	7.2%	7.1%	Q4	Q3
Corporate	Overheads as % of turnover	16.4%	10.7%	Q4	Q4
Cyclical Maintenance	Direct employees per 1000 props	2.57	0.82	Q4	Q4
Major Works	Direct employees per 1000 props	6.37	0.04	Q4	Q4
Rent arrears & collection	Write offs %	0.70%	0.37%	Q4	Q1
Responsive repairs	Direct employees per 1000 props	8.3	4.5	Q4	Q3
Tenancy Management	Evictions	0.08%	0.04%	Q4	no data
Void repairs	Direct employees per 1000 props	3.61	1.62	Q4	Q4