

**WEST DUNBARTONSHIRE COUNCIL****Report by the Chief Officer, Housing and Employability****Housing and Communities Committee: 2 February 2022**

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**Subject: West Dunbartonshire Housing Allocation Policy Review****1. Purpose**

- 1.1** This report seeks approval for changes to the Housing Allocations Policy resulting from a full review of the policy that was carried out during 2021 and which was the subject of a formal consultation which ended in Autumn 2021.

**2. Recommendations**

- 2.1** It is recommended that the Housing and Communities Committee:
- (i) Approves the proposed changes to the West Dunbartonshire Council Housing Allocation Policy and updated policy attached as Appendix 1, and ;
  - (ii) Requests that the Chief Officer Housing and Employability ensures the effective implementation of the updated Housing Allocation Policy including an appropriate communications plan.

**3. Background**

- 3.1** Following the introduction of the Housing (Scotland) Act 2014, a review of our Housing Allocations Policy was undertaken and was approved by the Housing and Communities Committee (HACC) in November 2017.
- 3.2** We committed to carry out a further review of the policy in 3 years (by Nov 2020), however the Covid-19 pandemic delayed this work and a report to the HACC in November 2020 proposed some small technical changes to the policy and outlined that a fully reviewed policy would be brought to a future HACC for approval.
- 3.3** The current Allocations Policy was updated to take account of the changes introduced by the 2014 Act. It largely reflects good practice and has not been the focus of large number of complaints. However, a number of issues had been raised including through discussion with tenant representatives which required some aspects of the policy to be reviewed and updated.
- 3.4** This review also provided the opportunity to improve the existing Allocations Policy so that it more adequately meets the aspirations of those in housing need, aligns with our Rapid Rehousing Transition Plan and fully takes account of the Scottish Government best practice guidance published in February 2019.

#### 4. Main Issues

- 4.1 The review process identified several areas where it was felt the policy could be improved and in June 2021 the Housing Improvement Board (HIB) agreed to consult with tenants, housing applicants and wider stakeholders on specific proposals to make changes to the policy.

##### Under-occupation of existing Council properties

- 4.2 **Issue:** Low numbers of existing council tenants who are currently under-occupying properties are applying for a transfer to a smaller property and few of these are actually being rehoused. Points currently being awarded for under-occupancy are not an adequate incentive to encourage more of our existing tenants to downsize and free up properties for larger families in housing need and on the housing list.
- 4.3 **Consultation and feedback:** We asked the following question - How supportive are you of the proposal to award more points to current and future transfer applicants who are under-occupying their properties? Feedback from the consultation showed clear support for this proposal with 73% of respondents being either very supportive or supportive.
- 4.4 **Proposal:** It is therefore being proposed that we increase the points awarded for under occupancy for tenants applying to be rehoused to 20 points for each spare bedroom.
- 4.5 **Benefits:** Increasing the number of transfer applications from households who are currently under-occupying and increasing the number of these households that are rehoused will free up more of the larger properties within our stock, which will enable us to better meet the evidenced need and demand currently on the housing list.

##### Doing more to increase access to housing for young people at risk of homelessness

- 4.6 **Issue:** Youth homelessness is a key challenge and West Dunbartonshire is noted as a “youth homelessness hot spot” within the Scottish Government’s statistics. Young people aged 16 to 24 make up 9.8% of the population in West Dunbartonshire, yet this age group accounted for 32% of all homeless presentations during 2020/21 (compared to a Scottish average figure of just 24%).
- 4.7 **Consultation and feedback:** We asked the following question - How supportive are you of the proposal to create a recognised pathway into housing for young people within our Allocations Policy? Feedback from the consultation showed clear support for this proposal with 64% of respondents being either very supportive or supportive.

**4.8 Proposal:** That young people at risk of homelessness are created as an additional group given a reasonable preference within the Allocations Policy and a certain proportion of available properties is allocated to this group (this would be similar to our provision for Young Care Leavers and the expectation is that they would be sourced from live cases at risk of homelessness and that are engaging with the Council's Housing Options Service). This quota will be reviewed and updated annually as is the case with other groups given reasonable preference within the policy.

**4.9 Benefits:** This would be a key system change in terms of initiatives to tackle youth homelessness and would align to our wider policy objectives outlined in our Local Housing Strategy and Rapid Rehousing Transition Plan. Our Care Leavers Housing Protocol has been cited as an example of best practice winning a COSLA Excellence Award in 2019 and if adopted will fundamentally positively impact in addressing the housing needs of young people. As with young people housed through a homelessness application we will ensure that the Homelessness and Housing Options service provide full resettlement support to young people also housed through this group and this would require to be resourced appropriately.

#### Awarding of Medical Needs and Disability points

**4.10 Issue:** The review of the Allocations Policy carried out looked closely at the issue of those with a medical need and their access to housing. The current approach is providing adequate access to housing for those applicants with a high and medium award, whilst those with a low award get little benefit in terms of being able to access housing. The review also highlighted that some Medical C awards have stipulations or recommendations such as 'applicant would benefit from a garden' or 'applicant would benefit from ground floor housing', however the subsequent points awarded is not adequate to secure this type of housing in a number of situations.

**4.11 Consultation and feedback:** We asked the following question - How supportive are you of the proposal to remove the low medical point category from our Allocations Policy? Feedback from the consultation for this proposal showed that more were supportive than unsupportive with 48% of respondents being either very supportive or supportive and 25% being either unsupportive or very unsupportive.

**4.12 Proposal:** Whilst feedback showed that more were supportive of the proposal than were unsupportive, it is being proposed following discussion with tenant representatives that this should be implemented as part of a wider review of how we identify and allocate properties based on medical need. No policy change is therefore being recommended at this time but this wider review will be taken forward and recommendations for changes will be made at a future meeting of the Housing and Communities Committee.

#### Social/Relocation Points

- 4.13 Issue:** Our Allocations Policy currently awards Social/Relocation points including Incoming Worker points for applicants experiencing difficulty in travelling to work and living more than 30 miles from their place of work in West Dunbartonshire. Feedback suggests that the current requirement to live more than 30 miles from a place of work, means that many people working in West Dunbartonshire and looking to live in West Dunbartonshire do not qualify for these points but still face difficulties in terms of time and expense travelling to work.
- 4.14 Consultation and feedback:** We asked the following question - How supportive are you of the proposal to remove the radius restriction for anyone who already works in West Dunbartonshire but doesn't live in the area? Feedback from the consultation showed support for this proposal with 47% of respondents being either very supportive or supportive and 21% being unsupportive or very unsupportive.
- 4.15 Proposal:** That the 30 mile qualifying criteria be removed and that all applications from those living outside of West Dunbartonshire are awarded Incoming Worker points.
- 4.16 Benefits:** This would support the wider Council objective of attracting more working people to live within the area, positively boosting the local economy and reducing travel time, costs and carbon impact for those who would benefit from such a change.

#### Points for living in a multi-storey flat

- 4.17 Issue:** The current allocations policy awards points for households who live in a multi storey flat and have children under the age of 16 and wish to move to alternative accommodation. This does not reflect any housing need and suggests that this house type in itself is not suitable for households with children. Given that multi storey flats account for around 14% of our housing stock, that many households with children live in this house type and that multi storey flats continue to be allocated to households with children, it is felt that this is not reasonable and does not align with a needs based policy.
- 4.18 Consultation and feedback:** We asked the following question - How supportive are you of the proposal to stop awarding the 10 points given to families in multi storey flats who wish to move out? Feedback from the consultation showed support for this proposal with 44% of respondents being either very supportive or supportive and 33% being unsupportive or very unsupportive.
- 4.19 Proposal:** That points awarded solely for living in a multi storey flat are removed from the policy. This change would not be applied retrospectively, meaning that this would only apply for new applications and that those applications on our housing list with these points would retain them and would not be adversely affected.

**4.20 Benefits:** Removes the suggestion that this house type in itself is not a reasonable housing option for households with children and is consistent with the development of our High Rise Home Strategy which aims to ensure that this house type is a positive housing destination for our citizens. All households currently living in a multi storey flat and applying for rehousing will continue to have their application assessed and pointed according to the wider policy.

## **5. People Implications**

**5.1** There are no direct people implications from this policy as implementing and meeting the requirements of the policy will be delivered from resources within Housing and Employability funded from the Housing Revenue Account and the ongoing review of these to ensure successful delivery.

## **6. Financial and Procurement Implications**

**6.1** There are no direct financial or procurement implications as a result of this policy.

## **7. Risk Analysis**

**7.1** The reviewed and updated Housing Allocations Policy provides the Council with the opportunity to improve the existing system and more adequately reflect the demand for housing and the need to use flexibilities available to ensure that tenancies are as sustainable as possible.

## **8. Equalities Impact Assessment (EIA)**

**8.1** The updated policy has been subject to a full Equalities Impact Assessment and no significant issues were identified, this is available as a background paper to this report.

## **9. Consultation**

**9.1** The review of the allocations policy was undertaken in close consultation with waiting list applicants, tenants and key internal and external partners.

**9.2** The process included early consultation with waiting list applicants to find out about their knowledge of the Allocations Policy, their awareness of points they had been awarded, their likelihood of being rehoused and the review process we have in place to see if improvements could be made in any of these areas.

**9.3** Staff representing relevant areas of the HSCP were involved in key staff working groups looking at areas of the policy that could be improved and contributing to the development of the proposals consulted on.

**9.4** The formal consultation received 1615 responses (866 from WDC tenants, 465 from waiting list applicants, 216 from WDC residents, 51 from staff and 11 from partner organisations). Feedback from the consultation is outlined above

and shaped the proposed policy changes being recommended. A full summary of the consultation exercise is attached as Appendix 2.

**9.5** An elected member session was held on the 12<sup>th</sup> January, allowing members a further opportunity to comment on the wider review in advance of this paper being presented to the Housing and Communities Committee.

## **10. Strategic Assessment**

**10.1** The Housing Allocations Policy sets out how the Council intends to let its houses. It lays out a hierarchy of need, in order to best allocate a limited supply of housing and has a crucial part to play in promoting sustainable communities, in which people will want to live and work.

**10.2** Having considered the Council's strategic priorities, this report and the subsequent positive outcomes will support all of the Council's key strategic priorities.

**Peter Barry**  
**Chief Officer Housing and Employability**  
**Date: 19 January 2022**

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**Appendices:** Appendix 1 – Draft Allocations Policy  
Appendix 2 – Allocations Policy Review Consultation Summary Document

**Background Papers:** Equalities Impact Assessment

**Wards Affected:** All