EXECUTIVE BRIEFING - 16 NOVEMBER 2004
EXECUTIVE PUBLIC - 30 NOVEMBER 2004

CHOICE-BASED LETTINGS REVIEW

REPORT OF COUNCILLOR K. CHOPRA

SUMMARY

1.1 This report comments on the findings of ARK Consultancy who have undertaken a review of the Council's Choice-based Lettings System known as "Locata".

2.0 RECOMMENDATIONS

2.1 To note the ARK Report (Appendix I).

2.2 To agree the Recommendations and Action Plan at 7.1.

2.3 To refine and improve the operational structures between Housing Strategy & Services and Hounslow Homes.

2.4 To recommend to Hounslow Homes that they enter into further discussions with the Council on functional split and the establishment of a dedicated Voids Team in Hounslow Homes.

2.5 Members to agree to receive a further report on any restructuring arising.
3.0 BACKGROUND

3.1 The Choice-based Lettings System (Locata) has been fully operational now for all bedroom sizes for the past 18 months. Locata is the brand name of the partnership between the London Boroughs of Ealing, Brent, Harrow, Hillingdon and Hounslow, and three Registered Social Landlords: Ealing Family Housing Association, Paradigm and Paddington Churches.

3.2 It is the largest Choice-based Lettings (CBL) System in the country and complies with all Government guidelines on offering maximum choice to housing applicants. A recent ODPM review of CBLs received a favourable response and the Government re-confirmed that all social housing should be offered through a form of choice-based lettings by the year 2010. With this in mind, a West London partnership was created to move away from the old points scheme to one of choice.

3.3 The current system allows households to express interest in properties that are advertised fortnightly in the Locata magazine. Bids for the property are prioritised; the applicant who has the highest priority within the banding system, and who has waited the longest amount of time, is invited to view the property through a multiple viewing whereby the top three applicants are invited to inspect the property. This ensures that the letting of the property can take place on the day to minimise rent loss.

3.4 It should be recognised that this change to a Choice-based Lettings System (CBL) was a major change to the way Council housing has traditionally been allocated. Historically, applicants were awarded points according to their housing need but they had no indication of their position on a waiting list as this could fluctuate on a daily basis as other households joined the housing queue and scored more points. Households had no idea of where and what type of properties were available and how long they would have to wait. This gave rise to immense frustration amongst clients requiring housing and practitioners who did not know when or if a household may be housed.

3.5 By moving to the CBL approach, for the first time a degree of transparency took place. Households could see what type of properties were becoming available and in what area. By publishing a results page in the Locata magazine, households could see the priority of households being rehoused and also the length of time they waited. Clients could then make informed judgements about the type of property they would be likely to be successful in bidding for.

3.6 It must be remembered that CBL was not designed to increase the number of properties becoming available or alter the type of accommodation being let. What is did do was allow households that would have been housed, the choice of where they live.

3.7 Who is housed by the Council is still governed by the Allocations Plan which is approved by Members. The Allocations Plan sets a percentage rehousing target for each client group by bedroom size. Properties are targeted for either a homeseeker (any applicant who is not a Council tenant) or a transfer (any household who is a tenant of the local authority). Properties are then marked for advert as either H or T or a combination of both. It is the Allocations Plan that determines who is housed not
 Locata itself. Locata is simply a mechanism for allocating property through a CBL system in accordance with the Council's Allocations Plan.

4.0 REVIEW AND METHODOLOGY

4.1 Once CBL had been up and running for a year, it was agreed with Hounslow Homes that a review would be undertaken to assess the impact of CBL on the Council, Hounslow Homes and the community. Expressions of interest to undertake the review were advertised and ARK Consultancy were successful in their bid.

4.2 ARK were charged with reviewing the impact of CBL, to ensure the scheme was legally robust and met the requirements of both the 1996 and 2002 Housing Acts that govern the applying for and allocating of social housing. This would be achieved by interviewing clients and staff, and carrying out desk top reviews of the application, allocation and letting procedures. Particular emphasis was placed on ensuring all sections of the community, including the BME and vulnerable households, have fair access to good quality social housing.

4.3 It must also be remembered that the creation of the CBL partnership ran concurrently with the formation of Hounslow Homes via their ALMO bid, therefore working practices very much mirrored those that were already in existence.

5.0 KEY FINDINGS

5.1 The report made the following key findings which form the basis of the recommendations made.

(1) The requirement for local authorities to provide choice to person seeking housing, is the impetus for Hounslow's membership of the West London Partnership Choice-based Lettings (CBL) scheme. The partnership has successfully piloted the largest CBL system currently in operation and has the capacity to develop the partnership and system software to achieve significant improvements for the customers it serves.

(2) There is a need for Hounslow, working with the partnership, to widen the concept of Choice from being a means whereby some applicants are able to choose where they live to having a range of choices in terms of tenure, landlord and enhanced opportunities to create mutual exchanges.

(3) The review considers there to be a greater need for Hounslow to engage with its customers more frequently and in a range of ways in order to ensure that the CBL system is fully understood and that literature and other means of communication reflect customers' needs.

(4) The structure and split of functions between Hounslow Homes and the Council needs refining in order to establish a clear definition of roles and facilitate better management of void properties. The split proposed will also enable estate management staff to be more pro-active in assisting tenant applicants to achieve a move.
(5) Support to vulnerable applicants must be improved, in particular to elderly applicants seeking sheltered housing. Low bidding levels are contributing to the voids issue and must be addressed.

(6) Support to Black and Ethnic Minority groups also requires improvement, where understanding of the bidding system and lack of available property, particularly for large households, contributes to negative perceptions of the system. The ARK study found there to be no evidence that BME or vulnerable tenants were being disadvantaged by the scheme.

(7) For both vulnerable and BME groups it is suggested that Hounslow builds an effective network of agency contacts with whom it can work in order for specific groups to better understand and manage the CBL system.

(8) The administration of the process needs improvement in terms of reporting mechanisms in relation to voids, lettings and the Allocations Plan. Key performance indicators need to be developed and owned for all stages of the process, and paper information must be improved in order to satisfy audit requirements. This blurring of roles and lack of management information not only makes analysis of problems difficult but also leads to accusations of unfairness and inefficiency based purely on anecdote.

(9) At a strategic level, it is necessary for Hounslow to develop better reporting in order to inform its rehousing strategies, as well as providing useful impact analysis that enables the Council to promote the positive aspects of choice, and respond proactively to any trends that may affect its ability to meet its strategic rehousing responsibilities.

6.0 ARK RECOMMENDATIONS

6.1 These can be placed under the following headings.

(A) Administration of System Procedures and Performance Management Arrangements

<table>
<thead>
<tr>
<th>Recommendation 1: Review current structures for the allocation and letting of property in relation to the function split between the Council and Hounslow Homes.</th>
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<tbody>
<tr>
<td><strong>Comment:</strong> The report recommends that consideration is given to the Hillingdon model for offering properties to view. The administrative task which involves receiving the shortlist for individual properties, verifying the top cases, arranging the accompanied viewing, and sending out the offer letter, is currently undertaken by the CBL Team in the Council. There is a point of view that should the shortlist go directly to the proposed centrally-based Voids/Allocation Team within Hounslow Homes, this could reduce the amount of time it takes for a household to view the accommodation and impact on the void turnaround time in a positive way. The current target to re-let an empty property in 40 days, for a non-sheltered unit, is being achieved. Shifting up this function will have significant implications for the staffing structures of both Hounslow Homes and the Council. It is proposed that more in-depth work is undertaken to look at the cost and IT implications, and that full consultation is</td>
</tr>
</tbody>
</table>
Protection of data conducted with staff. A further report to Members would be required.

**Recommendation 2:**
*Having a centralised Voids/Allocation Team within Hounslow Homes, will reduce training requirements and improve consistency.*

**Comment:**
At the present time, the responsibility for advising on CBL to tenants wishing to transfer is spread through the three management areas of Hounslow Homes, i.e. the East, West and Central areas. This means that at any one time a large number of staff are called upon to offer expert advice on CBL and the bidding process. It is acknowledged that even with extensive training, given the turnaround of staff and the fact that this would not be their main day-to-day function, a consistent level of expertise is unlikely to be attained. A centralised Voids/Allocation Team would enhance the service currently on offer to Hounslow Homes' tenants in terms of rehousing opportunities, as they would be able to build up expertise.

**Recommendation 3:**
*Once revised working practices have been agreed between the Council and Hounslow Homes, a Service Level Agreement is put in place.*

**Comment:**
A Service Level Agreement is currently in place for the allocation of property between the Council and Hounslow Homes. This will be reviewed in light of any changes that are agreed as a result of the ARK review.

(B) Access to Information and Communication Strategy

**Recommendation 4:**
*Applicants’ casefiles/records need to be improved to ensure that the assessment of the case is transparent and is evidenced at every assessment stage.*

**Comment:**
There are existing audit trails for the assessment of priority for rehousing and these ensure that no household can be assessed for a priority for rehousing and also receive an offer of accommodation from the same Officer. A standard proforma for assessment and priority authorisation will be designed and implemented from December 2004.

**Recommendation 5:**
*Improvements are made to the literature available in relation to the BME communities.*

**Comment:**
The explanatory booklet has recently been updated, and is now available in 17 languages as well as on audio file.
Recommendation 6:
*It is recommended that the Locata magazine is maximised to its fullest extent, given its wide circulation, to include other rehousing opportunities.*

Comment:
The long term aim of CBL was that it would be developed as an expanding business that would not only bring in other partners but also other rehousing opportunities. In a recent edition, Leeds City Council took advantage of the wide circulation of the magazine to advertise properties that were available in their area, so as to enhance rehousing opportunities for clients in West London. These properties would be let to households in West London with Leeds City taking nothing in return, i.e. reciprocal housing arrangements.

The Director of Locata has a clear remit from the Locata Board to develop new business, and work is already underway in developing a mutual exchange system.

(C) Policy and Performance Management Implications

Recommendation 7:
*Policy and Procedures relating to CBL need to be produced in a more easy-to-follow format with key performance indicators (KPI) and targets clearly shown.*

Comment:
Even though there are a number of KPIs, i.e. 40-day turnaround time for general purpose housing, these should be reflected throughout the entire letting process from keys received for an empty property to a tenancy date. These will be developed in conjunction with Hounslow Homes.

Recommendation 8:
*Reporting on all stages of the voids/allocation process needs to be enhanced in order to identify trends at the earliest possible stage.*

Comment:
This is acknowledged and mechanisms are already in place to monitor trends on bidders who are by-passed for reason and frequency, and also the monitoring of direct offers. Creating a centralised Voids/Allocation Team within Hounslow Homes, will enable tenants who are non-bidders to be analysed to either offer support in the offer process or look at alternative solutions to their housing problem.

Recommendation 9:
*Systematic reporting to look at rehousing trends in light of CBL.*

- Tenancy sustainment - look at trends over time - does choice have a positive impact?
- The level of non-bidders - are applicants using the system and what happens when they are not?
- Non-bidders within certain applicant categories - does non-bidding affect the delivery of the Allocations Plan?
Refusal rates - are there trends in relation to particular properties/estates and what action is being taken?

Ethnic monitoring - BME groups housed and the quality of property accessed.

Tenant transfers - by banding and type of property accessed.

Comment:
This is acknowledged but it must be remembered that CBL has only been in existence for 18 months. This would indicate some 1,200 properties being re-let within the Council's stock of approximately 15,000 units, representing 8%. It is therefore too soon to identify any realistic trends in relation to the make-up of Council estates prior to CBL. It is proposed that this is developed in the first quarter of 2005, when CBL has been operating for two years and meaningful information can be collated, i.e. regarding the BME community.

Recommendation 10:
Broadening the concept of Choice to include other forms of tenure.

Comment:
Shared ownership schemes in Hounslow have already been successfully marketed through the Locata magazine.

In addition, Leeds City Council has made properties available at no cost to the West London Partnership as a direct result of the marketing attractions of Locata.

The Locata business plan includes exploring mutual exchange schemes and advertising private sector properties.

(D) Equal Access Issues

Recommendation 11:
There is a need to improve the public relations aspect of Choice as there is a feeling of poor customer service in relation to the information provided, which can be interpreted as misleading given the shortage of social housing available.

Comment:
Even though extensive consultation took place on the introduction of the CBL, the perception is still that if you are not going to be rehoused it is Locata's fault. In reality, if you are unlikely to receive an offer through the Locata CBL system, you had even less chance of being rehoused under the old points system whereby you would have been lowly pointed and reliant upon the Council selecting you for an offer of accommodation which in reality would not happen. Under CBL everyone is free to bid for properties and, by operating a banding system, they have a reasonable expectation as to whether or not they are likely to succeed with their bid. Like any system whereby demand exceeds supply, clients who are happy are those who have been successful through the bidding system, and those who have not feel that the system is working against them.

Focus groups have already taken place since the commissioning of the review, both for the elderly and the BME community. These were received in a positive way and a
further series of focus groups will be set up to run through the rest of 2004 and through 2005. These will encompass all vulnerable groups in the community, and will be run jointly between Housing Strategy & Services, Social Services and/or the voluntary sector.

**Recommendation 12:**
The need for the development of resettlement support for vulnerable clients should be built on.

**Comment:**
The Homeless Persons Unit Resettlement Service already provides support to vulnerable clients which is complemented by a range of housing-related support services that are delivered under the Support People Strategy. The coverage and appropriateness of these services are evaluated through the development of the strategy and the service review process.

**Recommendation 13:**
Greater support to elderly households who require sheltered housing.

**Comment:**
The Older Persons Accommodation Sub-Group which is run jointly between Housing Strategy & Services and Social Services, will look at the systems needed to ensure that older people are aware of the housing options available to them, and have access to the necessary support to facilitate a timely move.

**7.0 ACTION PLAN**

7.1 In order to implement the recommendations of ARK, the following Action Plan has been devised.
### 7.1 Action Plan to Review Recommendations

<table>
<thead>
<tr>
<th>TASK</th>
<th>DETAIL</th>
<th>WHO</th>
<th>TIMESCALE</th>
</tr>
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<tbody>
<tr>
<td>a) Review structure of the application and letting processes</td>
<td>Identify costs of staffing levels in each organisation to reflect a centralised Voids Team. Increased rental income through improvement in void turnaround time.</td>
<td>Housing Services and Hounslow Homes</td>
<td>If structural changes are recommended, timescales will be influenced by formal consultation with staff and their representations re. reorganisation. Indicative target for recommendation and detailed Action Plan - December 2004. Implementation by April 2005.</td>
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<tr>
<td>b) Service Level Agreement for the allocation of property between the Council and Hounslow Homes</td>
<td>To be produced after the conclusion of (a).</td>
<td>Housing Services and Hounslow Homes</td>
<td>Post-restructuring, if agreed.</td>
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<tr>
<td>c) Applicants' priority for rehousing to be transparent</td>
<td>Case files to be clearly documented to reflect authorisation for the priority awarded</td>
<td>Housing Services and Hounslow Homes to arrange joint-training for all staff who manage clients</td>
<td>December 2004</td>
</tr>
<tr>
<td>d) Locata magazine is maximised to its full potential to create re-housing opportunities</td>
<td>Link with the Locata business plan for new business</td>
<td>Housing Services, Director of Locata, West London Partnership</td>
<td>Ongoing link to 2005/06 Locata Business Plan</td>
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<tr>
<td>e) Improve literature, especially to the BME community</td>
<td>CBL explanatory booklet now available in 17 languages. Meet with BME support agencies through the focus groups, to ensure equal access to CBL.</td>
<td>Housing Services, voluntary sector</td>
<td>First focus group - October 2004. Two open days for BME community arranged for November and December 2004.</td>
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<tr>
<td>f) Easy to follow staff procedures for CBL</td>
<td>Set up Key Performance Indicators that can be monitored for the entire allocation/lettings process</td>
<td>Housing Services and Hounslow Homes to agree KPI</td>
<td>March 2005 to reflect new agreed working practices.</td>
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<tr>
<td>TASK</td>
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<td>g) Improved reporting process</td>
<td>Enhanced management information for each void/ allocation function to identify &quot;hot spots&quot;.</td>
<td>Housing Services, Hounslow Homes, IT Division</td>
<td>April 2005 links to (f) above</td>
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<tr>
<td>h) Identify rehousing trends in CBL</td>
<td>Comprehensive analysis of who is being rehoused/ bidding trends impact on BME and elderly communities pre- and post-CBL</td>
<td>Housing Services</td>
<td>Establish data base - March 2005</td>
</tr>
<tr>
<td>i) Improve public perception/awareness of CBL</td>
<td>Focus groups to be arranged to promote/explain CBL</td>
<td>Housing Services, Hounslow Homes, Social Services, voluntary agencies</td>
<td>Quarterly meetings throughout 2005 links to (e), (j) and (k).</td>
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<tr>
<td>j) Support for vulnerable clients</td>
<td>Look at number of vulnerable clients bidding - if not, why? Ensure Social Services and the voluntary sector understand their role in supporting clients in the CBL process</td>
<td>Housing Services, Hounslow Homes, Social Services, voluntary sector</td>
<td>Agree working procedures with Social Services - November 2004</td>
</tr>
<tr>
<td>k) Support to the elderly</td>
<td>Are the elderly using CBL? Identify bidding trends.</td>
<td>Housing Services, Hounslow Homes, Social Services, voluntary sector</td>
<td>First focus group - October 2004. Open day to be arranged in first quarter of 2005.</td>
</tr>
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8.0 CONCLUSION

8.1 This is a far-ranging report which covers all aspects of the allocation and lettings process. The report has identified a number of strengths and weaknesses.

8.2 In the London context of social housing, the West London partnership far exceeds all other schemes operating in London. The CBL via Locata is a fully-operational Choice-based Lettings System giving rehousing opportunities across the West London area, with unlimited potential to expand that role to include opportunities in other parts of the country, a mutual exchange bureau, and also, with agreement, accommodation in the private sector.

8.3 The London Borough of Hammersmith & Fulham have committed to join Locata from July 2005, following the failure of their own choice initiative scheme in 2003. The Royal Borough of Kensington & Chelsea are currently considering joining. In addition, Registered Social Landlords (RSLs) Acton Housing Association, have given a commitment to join in December 2004, and Notting Hill Housing Trust are negotiating membership.

8.4 CBL is the future of social housing and this report gives the Council an excellent opportunity to build on the success of the partnership and be at the forefront of housing initiatives in London.

9.0 IMPACT ANALYSIS

9.1 Under the Race Relations (Amendments) Act 2000, the authority is required to assess the impact of all functions and policies within this Department on race. LBH has extended these impact assessments to include all target groups. Impact assessments will be carried out on all new policies and reviews of policies within this Department. Below are the conclusions drawn from the impact analysis of the Choice-based Lettings Review.

9.2 In light of the ARK recommendations, a focus group has already taken place with the BME community which was well-received.

This was arranged in partnership with the Hounslow Refugee Council and the Heston & Cranford Somali Association, with the meeting being well-attended.

Various issues were raised that could be linked to the lack of social housing in the area, together with the shortage of larger-sized homes.

It was agreed that further focus groups would be held throughout 2005, run in partnership with the voluntary agencies, to ensure the BME community is not disadvantaged.

9.3 Objective One: Promoting Community Leadership and Community Cohesion

Key Priority: More equalities monitoring is needed to ensure that CBL is not discriminating against certain groups within the scheme and contributing to tensions within the community.
9.4 **Objective Two: Improving Communications and Promoting Consultation and Involvement**

Initial consultation was undertaken with vulnerable groups, i.e. the elderly and BME groups, and recommendations have been made as a result of these consultations.

**Key Priority:** The changes recommend training and enlisting the help of community networks to support people through the bidding process. If these are put in place, consultation will need to be undertaken to measure the efficacy of these recommendations.

9.5 **Objective Three: Promoting Equality in Service Delivery**

The review indicates that the service is accessible for all groups.

Central Government is aware, with households having greater control over where they live, of the possibility of undue concentrations of single communities in specific areas. This will be reflected in the monitoring of the ethnic make-up of estates, with statistics reflecting pre- and post-CBL.

Recommendation 9 on page 6 refers, in relation to monitoring rehousing trends as a result of CBL.

**Key Priority:** Development of information in alternative formats. Also see Key Priority above.

9.6 **Objective Four: Promoting Equality of Opportunity in Employment and Training**

The impact analysis indicates that there are no key priorities for this objective.

9.7 **Objective Five: Evaluating the Success of Your Policy/Review for Promoting Equal Opportunities**

Key priorities from Objectives One to Four will identify and redress any gaps that could lead the scheme to have a negative impact on certain groups, i.e. BME, elderly.

9.8 The above priorities will be achieved through actioning the recommendations in the ARK report.

10.0 **COMMENTS OF HOUNSLOW HOMES**

10.1 The ARK report is a welcome step in reviewing the impact of Locata and its potential for the future. The recommendations, including a transfer of some Rehousing functions to Hounslow Homes, are supported and should reduce empty property turnaround time and rent loss. In order to exploit the opportunities afforded by Locata to make the best use of Council housing, Hounslow Homes would welcome a closer working relationship with Locata, for example through Board membership.
11.0 COMMENTS OF ASSISTANT CHIEF EXECUTIVE (FINANCE)

11.1 There are no additional financial implications from the report. The estimated gross
cost of Locata in the current financial year is £84,000 funded from the General Fund,
and £56,000 from the Housing Revenue Account.

12.0 COMMENTS OF HOUSING HEAD OF FINANCE (2641)

12.1 Any additional expenditure that may arise from the implementation of the report's
recommendations will have to be met from within existing Housing budgets.

13.0 COMMENTS OF ASSISTANT CHIEF EXECUTIVE (LEGAL)

13.1 The Assistant Chief Executive (Legal) has been consulted and has no further
comments to make.

14.0 COMMENTS FROM TENANTS/LEASEHOLDERS JOINT CONSULTATIVE
COMMITTEE (4 NOVEMBER 2004)

14.1 The Consultative Committee welcomed the report and supported the key findings and
recommendations arising. They welcomed the agreement to review the functional
split between LBH and Hounslow Homes.

The meeting identified the following:

(i) Disappointed that the review did not consider the current criteria and approach
to banding; the TLJCC would welcome the opportunity to have a full debate on
banding. The concern remains that the current criteria is not transparent or fair.

(ii) Customer care aspects need to be better explored; problems remain with
telephone bidding; the website still has problems; and the magazine is not set out
clearly to aid understanding.

(iii) The TLJCC would also like a further debate (as part of the allocation policy)
on the option of inter-estate transfers for family accommodation and for older tenants
looking to downsize or secure more appropriate accommodation.
<table>
<thead>
<tr>
<th>Contact:</th>
<th>Steve Chalcraft</th>
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<tbody>
<tr>
<td>Telephone:</td>
<td>020-8583-3809</td>
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</table>

**Background papers:**
- ARK Report
- Executive Report - Allocation Plan, March 2004
- ODPM Review - CBL, March 2004
- Void statistics

**This report has been or is due to be considered by:**
- Tenants & Leaseholders' Joint Consultative Committee - 4 November 2004

**This report is relevant to the following wards/areas:**
- ALL
LOCATA REVIEW

LONDON BOROUGH OF HOUNSLOW

ARK CONSULTANCY

FINAL REPORT

CONTENTS
EXECUTIVE SUMMARY

LBH CHOICE BASED LETTINGS REVIEW
FINAL REPORT
OCTOBER 2004
Overview

The requirement for Local Authorities to provide choice to persons seeking housing, is the impetus for Hounslow’s membership of the West London Partnership choice based lettings (cbl) scheme. The partnership has successfully piloted the largest cbl system currently in operation and has the capacity to develop the partnership and system software to achieve significant improvements for the customers it serves.

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The structure and split of functions between Hounslow Homes and the Council needs refining in order to establish a clear definition of roles and facilitate better management of void properties. The split proposed will also enable estate management staff to be more pro-active in assisting tenant applicants to achieve a move.

Support to vulnerable applicants must be improved, in particular to elderly applicants seeking sheltered housing. Low bidding levels are contributing to the voids issue and must be addressed.

Support to Black and Ethnic Minority groups also requires improvement, where understanding of the bidding system and lack of available property, particularly for large households, contributes to negative perceptions of the system.

For both vulnerable and B & ME groups it is suggested that Hounslow builds an effective network of agency contacts with whom it can work in order for specific groups to better understand and manage the cbl system.

The administration of the process needs improvement in terms of reporting mechanisms in relation to voids, lettings and the allocation plan. Key performance indicators need to be developed and owned for all stages of the process and paper information must be improved in order to satisfy audit requirements. This blurring of roles and lack of management information not only makes analysis of problems difficult but also leads to accusations of unfairness and inefficiency based purely on anecdote.

At a strategic level, it is necessary for Hounslow to develop better reporting in order to inform its rehousing strategies, as well as providing useful impact analysis that enables the Council to promote the positive aspects of choice, as well as respond pro-actively to any trends that may affect its ability to meet its strategic rehousing responsibilities.
INTRODUCTION

The London Borough of Hounslow is a founder member of the West London Partnership, which forms the management board of the Locata Choice Based Lettings System.

Locata was launched in April 2002. Initially, Hounslow piloted the system for one bedroom accommodation only but has been letting all of its property via the Locata system since January 2003.

Following a year of full operation, Hounslow wishes to review the impact of choice based lettings in relation to the following areas:

- the efficiency of letting properties and the means of minimising voids periods
- the level of customer satisfaction
- ensuring policies and procedures meet Housing Act and Audit requirements and achieve both Government and Council Guidance
- ensuring that all sections of the community, including vulnerable households, have fair access to good quality social housing via the choice-based lettings system

METHODOLOGY

The review has been undertaken using the following methodology:

- face to face interviews with relevant staff within the Council rehousing department and Hounslow Homes
- telephone interviews with relevant Council Members
- telephone interviews with tenant representatives
- desktop review of relevant policy and procedure internal to Hounslow Council and Hounslow homes
- desktop review of relevant Locata policy and procedure
- desktop review of relevant legislation and best practice
- analysis of relevant Key Performance Information internal to Hounslow Council and Hounslow Homes, as well as comparative data from the Locata system and West London Partners
- telephone interviews with members of the West London Partnership
- telephone and one to one questionnaire based interviews with a range of applicants and recently housed tenants
- an audit of applicant files
- attendance at a joint Council and Almo staff meeting
- attendance at a Tenant Joint Consultative Committee meeting
- facilitating a B&ME and older persons' focus group
SECTION II

BACKGROUND

The 2000 Housing Green Paper announced the intention to test the ability of Local Authorities to provide choice for applicants applying for housing. In Autumn of that year 27 pilots were announced, including Locata. The Government’s intention regarding choice was confirmed by its announcement that all Local Authorities must offer applicants choice by 2010 and set down a requirement within the Homelessness Act 2002 for Local Authorities to provide information within their rehousing policies on options for choice.

The West London Partnership’s Locata choice based lettings system was the largest of the pilots and is now, along with 25 of the original pilots, a permanently established system.

This review has been commissioned at the same time as the ODPM review of the pilots has been published. Some of the emerging themes from the ODPM review, which give context to this report, are outlined below:

- the numbers of households that registered for housing increased in almost all pilot areas, in some cases dramatically. There were significant increases in working and B&ME households
- the weakest area was the provision of support to vulnerable households
- significant was the concern of the impact of CBL on void performance. The pilots have shown an improvement in voids performance, with, at worst a steady state
- the review could not make recommendations in relation to community stability but considers that this will emerge in the medium term
- positive customer feedback, who viewed the systems as more transparent and simple and perceived them to be offering choice
- all Local Authorities are positive about commitment to the various systems post the pilot period

Other members of the West London Partnership have also been reviewing and developing their rehousing strategies.

Hillingdon has undertaken a review of the introduction of choice based lettings. This has recommended that Hillingdon remains a partner of the West London Partnership and concludes that:

- Locata offers the greatest level of choice to applicants in terms of the bidding process and cross borough bidding
- no other scheme offers the same regional grouping

The report recommends a detailed action plan, much of which requires further development of the Locata ICT, and is reliant upon effective joint working within the Partnership in order to achieve the action plan.
More recently Brent has established its project – ‘Making and Managing the Sustainable Community’ – the aim of which is to ‘enhance the services and choices enjoyed by its customers’.

The project will complete in January 2005 and, in particular, will

- determine a model for the best use of temporary housing and support for residents within temporary housing
- test the feasibility for a common housing register and common needs assessment
- develop protocols for building and maintaining sustainable communities
- measure and target under-occupation

Again, this provides an opportunity for the Partnership to work together to establish and learn from best practice in relation to responding innovatively to broadening choice and maximising use of housing stock.

In common with other members of the Partnership, Hounslow’s housing stock is managed and maintained by an Arms Length Management Organisation (ALMO). This has required a split of the lettings function between the Council and the ALMO with a consequent impact on the need for effective liaison and management of the working relationship. It also raises questions in relation to the influence the ALMOS have in terms of the future development of choice based lettings in relation to the Locata Management Board. These issues are explored further within the review report.

In response to the review, Hounslow Homes has made a detailed submission. Key elements of the submission are referenced within the relevant sections of the report.
SECTION III

REHOUSING

Operational Structure and Responsibilities

The Rehousing Department of Hounslow Council is responsible for the lettings function in terms of managing waiting lists and letting all property in accordance with the Council’s Allocation Plan.

The Council is responsible for assessing all non-Hounslow tenant applicants seeking housing.

When an applicant presents for rehousing, either in person or as a result of having completed an application form and sent it to the Council, the initial inputting is undertaken by a Customer Information Officer using the Council’s Ohms housing software.

Assessments of these applications are then undertaken either by Housing Needs Officers or Homeless Assessment officers. The priority assessments are undertaken using the Locata priority banding and the homelessness assessment using Hounslow’s ‘Allocations Scheme’.

Key to the rehousing function are the Resettlement Team, providing support to vulnerable clients (see Section X page 24) and the Temporary Accommodation team to whom the majority of applicants are referred if the Council has a duty to house.

The team responsible for managing the lettings function is the Choice Team, comprising 6 Choice Officers, one Senior Choice Officer and a Team Leader. This team structure reflects recent structural changes brought about as a result of the introduction of choice based lettings. 2 additional members of staff have been employed in order to effectively manage the choice based lettings system. In addition, the new structure has been influenced by general structural changes within the rehousing section, to deliver improved business objectives.

Once cases have been assessed and loaded onto the Ohms system, the Locata system will upload the information on a daily basis to ensure that the Hounslow waiting list is up to date.

Although the Choice Team is not directly involved in assessing cases, they will check to ensure that assessments have been undertaken correctly and that applicants have been placed within the appropriate band.

The Choice Team is also responsible for visiting all cases within Bands A and B, as well as all applicants aged over 50, regardless of Band.

Each Choice Officer has a specialist portfolio, e.g. sheltered applicants, applicants leaving care as well as being responsible for specific decant programmes. For decants, the Choice Officers will ensure bands are changed in accordance with the phasing of the build scheme and the need to move. They will also provide support to decants for bidding and make a direct offer if no bids have been made within the time available.
For sheltered vacancies, a list is maintained identifying where applicants have requested a specific scheme and a direct offer will be made to that applicant of a vacancy where no bids are received. Direct offers are also made where hard to let sheltered vacancies also receive no bids via the Locata scheme.

The Choice Team manage the key elements of the lettings process as follows:

- managing the advertisement of all void properties once notified that they are available for letting – this includes ensuring the details contained within the Locata magazine advertisement are accurate and sufficiently descriptive
- determining which property is available to which applicant for bidding purposes – this is managed in line with the allocation plan to ensure that the percentage quotas for homeless/waiting list/tenant transfers are achieved
- managing shortlists to ensure bidders are eligible for the property for which they have bid
- requesting verification information on applicants who have bid for properties
- sending offer letters to successful bidders
- arranging multiple viewings with estate based staff
- making direct offers to sheltered applicants
- ensuring details are received of reasons for refusal of a property
- inputting tenancy start dates and creating rent accounts for new tenants
- closing shortlists
- training new staff within rehousing
HOUNSLOW HOMES

Operational and Structural Responsibilities

Hounslow Homes is one of the first of eight ALMOs established in the UK, responsible for managing and maintaining Hounslow Council’s stock of 15,000 homes.

The housing is managed via three area offices: West, Central and East areas. Each area employs staff responsible for the lettings process as follows

<table>
<thead>
<tr>
<th>Area</th>
<th>Customer Information Officers</th>
<th>Rent/tenancy Management Officers</th>
<th>Neighbourhood Estate Managers</th>
</tr>
</thead>
<tbody>
<tr>
<td>West</td>
<td>8 x</td>
<td>7 x</td>
<td></td>
</tr>
<tr>
<td>Central</td>
<td>7 x</td>
<td>7 x</td>
<td>4 x</td>
</tr>
<tr>
<td>East</td>
<td>8 x</td>
<td>5 x</td>
<td>4 x</td>
</tr>
</tbody>
</table>

Although the structure for delivering housing management and related services to tenants has changed significantly with the establishment of the ALMO, the split of lettings functions between rehousing and housing management staff has not changed significantly from what was in place prior to the ALMO’s existence.

Customer Information Officers

- process all transfer applications
- provide transfer applicants with all ‘user information’ for Locata
- assess transfer applicant band
- confirm banding to tenant
- ‘flag’ void on system when tenant gives notice
- raise void inspections when keys received
- undertake sign ups – Central area and Ivybridge neighbourhood only

Rent/Tenancy Management Officers and Neighbourhood Estate Managers

- check transfer application forms – not in all areas
- respond to any household discrepancies resulting from application form
- co-ordinate medical cases via Medical Officer
- visit all sheltered tenant applicants
- monitor all voids on patch
- undertake verification visits, either as routine or as requested by the Choice Team when an offer is imminent
- undertake accompanied viewings and confirm outcome
In addition to locally based staff, the ALMO has two central posts – one co-ordinating the allocations process and the other co-ordinating the voids process. Their roles are summarised as follows:

**Allocations Co-ordinator**

- central liaison role between ALMO and Hounslow Rehousing Team
- source of information and training support in relation to Locata function
- manages complaints and mediation process
- monitoring of performance in relation to verification of A and B banded transfer cases
- monitoring of performance in relation to accompanied viewings
- monitoring of bidding for management transfers
- monitoring progress for decants and seeking authorisation for decants requiring direct offers

**Voids Co-ordinator**

- overall monitoring of voids process via estate management and voids inspection staff
- inputting of all property details
- developing policy and procedure related to voids management
SECTION V

PROCEDURES GOVERNING THE LETTINGS PROCESS

The main document underpinning the lettings process for Hounslow Council is the ‘LBH Allocation Scheme’. This identifies:

- eligibility to join the Housing Register
- the assessment process
- the banding process, with a detailed appendix as to how to band individual cases
- the verification process
- property advertising
- bidding
- selection
- offers
- direct lettings
- appeals

This document effectively sets out the ‘rules’ applying to the letting of housing within LBH but supplemented by some procedural guidance.

In addition to the above, the following detailed procedural documents have been developed:

- advertising voids in ‘Locata Home’ – registering new applicants
- verification process
- RSL nomination procedure –
- sheltered housing
- acceptance of offers –
- trading places payments

Staff within the Choice Team have access to a Locata guidance manual to ensure accurate use of the Locata software.

Within the area offices, there is a detailed procedure manual that for all housing management-related activities, including the letting of homes. This does not currently reflect the choice-based lettings function but is in the process of being updated.

The voids procedure for Hounslow Homes has recently been updated to reflect the choice-based lettings requirements and is currently in final draft form.
QUALITY AND PERFORMANCE MONITORING

There are two key areas for quality and performance monitoring in relation to the lettings process:

- void turnaround time and the impact on rent loss for the ALMO
- the lettings process as it relates to applicants eligible for housing by LBH

Voids

The ODPM’s review of the 27 choice based pilots confirms a significant focus by both Local Authorities and RSLs on void management and concerns regarding the impact that choice based lettings would have on this as a key area of performance. The report finds that in the majority of cases the introduction of choice based lettings has resulted in a reduction in void turn around times or, at least, a steady state.

In contrast to these findings, Hounslow Homes’ voids performance has deteriorated and the submission from Hounslow Homes to this review states:

- the introduction of choice based lettings has increased the void turnaround time
- rent loss as a result of void properties has increased from 0.7% to 1.5% of rental income

Voids performance for the past three years to date, shows the following trends:

01.04.01 – 31.03.02 – 37.58 days average
01.04.02 – 31.03.03 – 42.18 days average
01.04.03 – 29.02.04 – 68.00 days average

The following shows Hounslow’s current performance in comparison to other members of the West London Partnership:

<table>
<thead>
<tr>
<th>Member</th>
<th>Void Turnaround</th>
<th>Void Target</th>
<th>Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ealing</td>
<td>42 days</td>
<td></td>
<td>tenancy end to tenancy start</td>
</tr>
<tr>
<td>Brent</td>
<td>33 days*</td>
<td>30 by 2006</td>
<td>ditto</td>
</tr>
<tr>
<td>Harrow</td>
<td>39 days</td>
<td></td>
<td>keys in to keys out</td>
</tr>
<tr>
<td>Hillingdon</td>
<td>32.75 days</td>
<td>32 days</td>
<td>tenancy end to tenancy start</td>
</tr>
<tr>
<td>Hounslow</td>
<td>68 days**</td>
<td>35 days</td>
<td>tenancy end to tenancy start</td>
</tr>
</tbody>
</table>

*This does not include any sheltered housing voids, as Brent have stock transferred all sheltered to RSLs

**It is important to note that Hounslow’s performance is trending downwards, with a turnaround figure for February of 49.26 days.
In addition to the internal monitoring and comparisons within the West London Consortium, there are monitoring reports produced by Locata that give an indication as to elements of the void performance. For example:

**Locata Reports - Letting Intervals**

<table>
<thead>
<tr>
<th>Partner</th>
<th>BRE</th>
<th>EAL</th>
<th>EFHA</th>
<th>HAR</th>
<th>HIL</th>
<th>HOU</th>
<th>PCHA</th>
<th>PHA</th>
<th>All Partners</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bidding Closed</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Offer Status</td>
<td>11.9</td>
<td>13.2</td>
<td>14.5</td>
<td>11.4</td>
<td>11.8</td>
<td>13.7</td>
<td>14.4</td>
<td>14</td>
<td>12.8</td>
</tr>
<tr>
<td>Final Offer</td>
<td>21.9</td>
<td>12.9</td>
<td>20.5</td>
<td>14.5</td>
<td>9.4</td>
<td>23.8</td>
<td>22.7</td>
<td>40.8</td>
<td>17.1</td>
</tr>
<tr>
<td>Offer Accepted</td>
<td>30.7</td>
<td>25.1</td>
<td>26.1</td>
<td>47.1</td>
<td>28.2</td>
<td>24.4</td>
<td>40.2</td>
<td>25</td>
<td>29.7</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>65</strong></td>
<td><strong>51</strong></td>
<td><strong>61.2</strong></td>
<td><strong>73</strong></td>
<td><strong>49</strong></td>
<td><strong>77.2</strong></td>
<td><strong>80</strong></td>
<td><strong>59.6</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Offer Process</strong></td>
<td>33.8</td>
<td>26.1</td>
<td>35</td>
<td>25.9</td>
<td>21.2</td>
<td>37.5</td>
<td>37.1</td>
<td>54.8</td>
<td>29.9</td>
</tr>
</tbody>
</table>

The above analysis identifies the time taken from close of bidding to an offer being accepted. This report reflects the partners’ performance from the inception of Locata to date. ‘Offer accepted’ is not a reliable timescale because some members interpret this as being the time that the tenancy commences and therefore extend the period measured.

However, if the time between initial offer status to final offer is measured, Hounslow’s performance is the slowest when compared to its Local Authority partners only.

From the closure of bidding to putting a property under offer the following tasks require completion:

- receipt of the confirmation that the property is ready for viewing
- interrogation of the shortlist and removal of any applicants who are ineligible for the property under offer
- verification of the applicants eligible for an offer

From offer status to final offer, the following tasks require completion:

- arrangement and undertaking of accompanied viewings
- confirmation of acceptance
- confirmation of tenancy start date

This report, reflects the period when Hounslow did not make multiple offers, which will have significantly lengthened the time between ‘offer status’ and ‘final offer’. Despite this, it should still be used an indicator of potential areas of weakness in performance and the basis for interrogation of those areas in order to effect improvements.

The voids procedure is governed by a range of performance indicators, as follows:
### The Lettings Process

There are a range of performance indicators that govern the lettings process as follows:

<table>
<thead>
<tr>
<th>KEY STAGE</th>
<th>PERFORMANCE INDICATOR</th>
</tr>
</thead>
<tbody>
<tr>
<td>applicant verifications</td>
<td>within 48 hours of request for H/Low applicants, 72 hours for partners</td>
</tr>
<tr>
<td>make offers</td>
<td>within 2 working days of receipt of shortlists</td>
</tr>
<tr>
<td>outcome of accompanied viewings</td>
<td>within 2 working days or immediately if applicant accepts</td>
</tr>
<tr>
<td>clear shortlists</td>
<td>within 3 days of receipt of fortnightly lists</td>
</tr>
</tbody>
</table>

### Process Management

The management of the voids and lettings processes is heavily reliant upon joint working between Hounslow Homes and the Choice Team.

In recognition of this a joint action plan for the improvement of voids and related issues has been agreed by Hounslow Homes and the Council, focusing on the following key objectives:

- enforcing the four week notice period – this includes giving consideration to offering tenants incentives to give notice
- ensuring properties are advertised at pre-void stage
- revising the target times for completion of void repairs and investigating the feasibility of undertaking some repairs with tenant in situ
- more effective use of adapted properties
- improve working practices as they relate to use of Locata
- revision of procedures to increase lettings in sheltered housing
- improve working relationships between rehousing and the ALMO

The process, relevant KPIs and reports currently generated is outlined below:

<table>
<thead>
<tr>
<th>TASK</th>
<th>RESPONSIBLE OFFICER</th>
<th>HOW NOTIFIED</th>
<th>TO WHOM</th>
<th>KPI</th>
<th>HOW REPORTED</th>
</tr>
</thead>
<tbody>
<tr>
<td>provisional void notification</td>
<td>CIO</td>
<td>Ohms –</td>
<td>Choice Team run report on daily basis</td>
<td>within 24 hours of notification</td>
<td>Infomaker report identifies void</td>
</tr>
<tr>
<td>property advertised</td>
<td>Choice Team</td>
<td>Locata software</td>
<td>Locata</td>
<td>by Mon prior to Locata Home print.</td>
<td>Infomaker report</td>
</tr>
<tr>
<td>void works instructed</td>
<td>CIO</td>
<td>Ohms</td>
<td>Voids Team</td>
<td>as soon as ten terminated or void notified</td>
<td>Not</td>
</tr>
<tr>
<td>void inspection undertaken</td>
<td>Voids Team</td>
<td>Ohms</td>
<td>Estate Manager</td>
<td>within 24 or 72 hours</td>
<td>Ohms</td>
</tr>
<tr>
<td>property details confirmed</td>
<td>Voids co-ordinator</td>
<td>Property details are confirmed at various stages — full details may be available when a provisional void is ready to advertise, or may be confirmed later.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>void works undertaken</td>
<td>Voids Team</td>
<td>Ohms</td>
<td>Estate Manager</td>
<td>7 or 14 days</td>
<td>Ohms</td>
</tr>
<tr>
<td>void completed</td>
<td>Voids Team</td>
<td>Ohms</td>
<td>Estate Manager</td>
<td>production of hab cert by 12 noon following works completion</td>
<td>Ohms</td>
</tr>
<tr>
<td>shortlist received</td>
<td>Choice Team</td>
<td>Locata</td>
<td>Choice Team</td>
<td></td>
<td></td>
</tr>
<tr>
<td>verification requested</td>
<td>Choice Team</td>
<td>e-mail</td>
<td>EM/H.less/Temp</td>
<td>no</td>
<td>not</td>
</tr>
<tr>
<td>verification confirmed</td>
<td>Homeless/ Estate Managers</td>
<td>e-mail</td>
<td>Choice Team</td>
<td>within 48 hours of request</td>
<td>not</td>
</tr>
</tbody>
</table>
### Task Management

<table>
<thead>
<tr>
<th>Task</th>
<th>Responsible Officer</th>
<th>How Notified</th>
<th>To Whom</th>
<th>KPI</th>
<th>How Reported</th>
</tr>
</thead>
<tbody>
<tr>
<td>accompanied viewing arranged</td>
<td>Choice Team</td>
<td>e-mail</td>
<td>Estate Managers</td>
<td>no</td>
<td>not</td>
</tr>
<tr>
<td>refusal/acceptance notified</td>
<td>Estate Manager</td>
<td>e-mail</td>
<td>Choice Team</td>
<td>within 24/48 hours of viewing</td>
<td>not</td>
</tr>
<tr>
<td>tenancy sign up notified</td>
<td>Estate Manager/CIO</td>
<td>Ohms</td>
<td>Choice Team</td>
<td>run report from Ohms</td>
<td></td>
</tr>
<tr>
<td>tenancy start date confirmed</td>
<td>Choice Team</td>
<td>e-mail</td>
<td>Choice Team request from Estate Manager</td>
<td></td>
<td></td>
</tr>
<tr>
<td>tenancy start date input and rent account set up</td>
<td>Choice Team</td>
<td>Ohms</td>
<td>Estate Manager</td>
<td>no</td>
<td>Ohms</td>
</tr>
<tr>
<td>shortlist closed</td>
<td>Choice Team</td>
<td>Locata</td>
<td>Locata</td>
<td>within 3 days of receipt of lists</td>
<td>Locata</td>
</tr>
</tbody>
</table>

As well as the joint action plan, the management of the process is based on a range of reports confirming the void performance at overall and at local level. However, there are a number of weaknesses in relation to the performance and process management as follows:

- not all tasks within the process have KPIs attributed to them
- although there are reports within the monthly ‘Task Force’ publication that can monitor elements of the process, the overall information is not easy to find and lost within the detail of the overall report

The above process ‘map’ also shows the split of the voids/lettings function between Hounslow Homes and Choice Team staff. The liaison between the two departments is crucial in terms of impacting upon the speed of letting property and needs to be fully supported by effective ICT in order to function. There are key stages within the process that are managed outside of the Ohms system, i.e. by using e-mail. For example, appointments are made using e-mail, rather than electronic diaries, thus building potential delays when estate management staff may be unavailable or have conflicting priorities.
Auditing the Process

As part of the review, a small number of applicant files have been reviewed in order to audit the key stages of the lettings process and identify how well information is maintained in relation to the progression of an application. Details of the outcome of this exercise are appended to this report at 2.
DIRECT OFFERS

Within the protocols governing the letting of property, there are a limited number of scenarios where lettings are made outside of the bidding process and an offer is made directly to an applicant. These are:

- management transfers of tenants where urgent rehousing is required – such transfers are subject to approval by the Housing Director
- homeless households within temporary accommodation where the lease between Hounslow and the landlord is coming to an end and the applicant has not bid successfully
- sheltered housing lets where an applicant has requested a specific scheme or no bids have been made for a vacancy

Hounslow Homes’ submissions to this review states:

- the system has little to offer elderly or vulnerable tenants
- it is inappropriate for management transfers

Management Transfers

From 1.04.03 to 31.03.04, 54 management transfers applicants were rehoused, representing 20% of all transfers rehoused. Although there are no reports identifying how many of these were direct offers, the Hounslow Homes submission states …"I receive many requests for a direct offer for these clients because they have run out of time or because their needs have become more severe and they are unsuccessful in the bidding process”.

In addition, there are problems for management transfers who often do not bid for the right size property, e.g. an overcrowded family is only entitled to bid for equivalent size property on the basis that their transfer assessment is based on management transfer criteria and not overcrowding.

Sheltered and Vulnerable Tenants

The implications of the choice based system for vulnerable tenants is explored further in Section X, page 24.

However, direct offers are made outside of the choice based system at present, principally in order to respond to the voids problem. However, elderly applicants can be identified for direct offers at the assessment stage, if it is considered that they cannot manage the bidding process.

At present the number of direct offers made outside of the choice system is not systematically monitored and, therefore, the level of such activity is unknown in the context of overall lettings.

SECTION VIII
Are Hounslow Meeting Their Rehousing Objectives?

Hounslow’s Allocation Plan sets out its targets for housing different applicant groups and tenants in line with its housing strategies and within the context of its legal obligations as a Local Authority.

The allocations plan is based on projections for rehousing applicants/homeless and transfers within a range of property sizes.

The allocation plan and its performance for 2003/04 can be summarised as follows:

<table>
<thead>
<tr>
<th>Rehousing Group</th>
<th>Bedsit/1bed target</th>
<th>Outcome</th>
<th>Outcome</th>
<th>2 bed target</th>
<th>Outcome</th>
<th>3+bed target</th>
<th>Outcome</th>
<th>Total Outcome</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicants</td>
<td>181</td>
<td>77</td>
<td>52</td>
<td>32</td>
<td>35</td>
<td>9</td>
<td>12</td>
<td>124 g/n 52 shel 176</td>
</tr>
<tr>
<td>Homeless</td>
<td>155</td>
<td>182</td>
<td>28</td>
<td>257</td>
<td>279</td>
<td>112</td>
<td>89</td>
<td>550g/n 28 shel 578</td>
</tr>
<tr>
<td>Transfers</td>
<td>181</td>
<td>60</td>
<td>62</td>
<td>107</td>
<td>83</td>
<td>66</td>
<td>70</td>
<td>213 g/n 62 shel 275</td>
</tr>
<tr>
<td>Total lettings</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>1029</td>
</tr>
</tbody>
</table>

The percentage split of lettings compared to the allocation plan target was as follows:

<table>
<thead>
<tr>
<th>Rehousing Group</th>
<th>Sheltered</th>
<th>Bedsit/1bed</th>
<th>A/P target</th>
<th>2 bed target</th>
<th>A/P target</th>
<th>3+ bed target</th>
<th>A/P target</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicants</td>
<td>37%</td>
<td>24%</td>
<td>35%</td>
<td>8%</td>
<td>8%</td>
<td>7%</td>
<td>5%</td>
</tr>
<tr>
<td>Homeless</td>
<td>20%</td>
<td>57%</td>
<td>30%</td>
<td>70%</td>
<td>65%</td>
<td>52%</td>
<td>60%</td>
</tr>
<tr>
<td>Transfers</td>
<td>44%</td>
<td>19%</td>
<td>35%</td>
<td>21%</td>
<td>27%</td>
<td>41%</td>
<td>35%</td>
</tr>
</tbody>
</table>

If the sheltered and bedsit/one bed categories are combined they compare to the allocation plan target as follows:

Applicants: 28% compared to a target of 35%
Homeless: 46% compared to a target of 30%
Transfers: 26% compared to a target of 35%

The overall achievements in percentage split, compared to the original allocations plan were as follows:

<table>
<thead>
<tr>
<th>Rehousing Group</th>
<th>Allocation Plan %ge of all lets</th>
<th>Outcome %ge of all lets</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applicants</td>
<td>20%</td>
<td>17%</td>
</tr>
<tr>
<td>Homeless</td>
<td>47%</td>
<td>56%</td>
</tr>
<tr>
<td>Transfers</td>
<td>32%</td>
<td>27%</td>
</tr>
</tbody>
</table>

As stated above, transfers and applicants fell short of their targets in 1beds. Transfers also fell short of their 2 bed target by 6% but gained 6% on their 3 bed target.

Overall, it would appear that the introduction of choice based lettings has not prevented Hounslow achieving, with some small measure of discrepancy, its objectives in relation to the allocation plan. However, in assessing the impact of choice, the following factors need clarification:

1. Is the percentage split of accommodation between the different rehousing groups based on known demand levels from within those groups? Demand would identify the most significant size requirements for each group, as well as the type of property being sought.

2. The most significant mismatch between allocation target and actual take up is in relation to bedsit/one bed accommodation where homeless exceeded their quota by 16%. Applicants and transfers fell short of their quotas by 11% and 13% respectively. However, these figures are not a true reflection of demand for these units as they are combined with the sheltered accommodation for which there are no applicant quotas set.

3. Where a target is not achieved, is this because a specific rehousing group is not bidding or that allocation of property for specific bidders is not managed pro-actively to ensure that targets are met?

Sheltered Housing

The allocation plan confirms that ‘letting of sheltered housing remains a significant issue’.

The voids performance in relation to sheltered vacancies has deteriorated and Hounslow Homes is of the view that this is as a direct cause of the introduction of choice based lettings.

Difficulties with sheltered lettings is an experience shared by most local authorities and RSLs. The number of potential applicants has also been reduced by the imposition by Supporting People of 60 years being the minimum age eligibility for sheltered. In recognition of the change in demand for sheltered housing, the allocations plan makes reference to closure of schemes as part of its strategy in relation to reducing the number of units and removing less desirable properties from its portfolio.

In assessing whether the choice based lettings system is enabling Hounslow to meet its allocation objectives in relation to sheltered housing, the following factors need further consideration:

1. The demand for sheltered housing is principally from applicants and transfers – what is the level of demand compared to likely supply?
2. If the above is known, the allocation plan should separate out its anticipated lettings to sheltered housing from its general needs accommodation and identify where any shortfalls or gains arise within the bidding/letting process.

Issues relating to sheltered applicants are considered further within Section X, page 24 of this report.

Tenant Transfers

Hounslow Homes’ submission to this review raises a number of issues in relation to tenant transfers and the impact of choice based lettings. In relation to the allocation plan, Hounslow Homes also comment on the increased pressure on transfers as a result of the Local Authority’s decision to amend the allocation quotas.

The choice based lettings system is not therefore the cause of reduced numbers of homes being made to transfers. However, because the Council is promoting choice, any reduction in available stock for any applicant group will inevitably reduce that choice.

Use of ICT to support the allocation plan

In assessing whether choice based lettings is supporting Hounslow in delivering its allocation objectives it is difficult to make pre-choice comparisons, other than in a very general context.

The Locata software has the capacity to generate a wide range of reports that can be used to underpin the allocation plan and answer some of the issues that have been raised within this section of the review.

In addition, the reporting capability can be used to identify trends over time – both positive and negative – and enable the Council to plan and respond accordingly.

At present there is no systematic reporting being used to support the allocation plan.

SECTION IX

STRUCTURES AND INTERFACE – THE ISSUES

Hounslow Homes’ submission to this review raises the following key points in relation to structures and interface with rehousing and the Locata Board:

- the split of functions has given HH additional liaison, management and bureaucracy costs
- process simplification needs to be considered
- consideration should be given to delegating the full voids/lettings process to HH
- the ALMO needs to have a voice on the Locata board
- there is a perception that other Locata members do not submit all properties to the system
In considering the above, a comparison has been made with the other Local Authority partners within the West London Partnership, as follows:

<table>
<thead>
<tr>
<th>Partner</th>
<th>ALMO</th>
<th>Rehousing Function</th>
<th>ALMO function</th>
<th>Issues</th>
<th>ALMO and Locata</th>
</tr>
</thead>
<tbody>
<tr>
<td>Hillingdon</td>
<td>Yes</td>
<td>Assess and load all applicants including transfers. Undertake all verifications.</td>
<td>ALMO manage all shortlists from creation to letting</td>
<td>Neighbourhood split makes liaison difficult would prefer central ALMO team</td>
<td>No links directly to Locata. Monthly internal liaison meetings only.</td>
</tr>
<tr>
<td>Harrow</td>
<td>Imminent</td>
<td>although currently centralised will split function as per Hillingdon post ALMO</td>
<td>as above post ALMO</td>
<td>Working to reduce voids post a BV Review but do not believe cbl impacted negatively on void performance.</td>
<td>No direct links planned but have worked hard to ensure communications work well.</td>
</tr>
<tr>
<td>Ealing</td>
<td>Transitional Year</td>
<td>assessment of homeless and applicants, manage shortlists</td>
<td>assess tenant transfers, manage voids, property details, accompanied viewings.</td>
<td>Some void problems but not linked to cbl. Interim structure for one year. Will review. Automatic banding.</td>
<td>Current Director of Housing will be ALMO Director but unlikely to retain position on Locata Board.</td>
</tr>
<tr>
<td>Partner</td>
<td>ALMO</td>
<td>Rehousing Function</td>
<td>ALMO function</td>
<td>Issues</td>
<td>ALMO and Locata</td>
</tr>
<tr>
<td>---------</td>
<td>------</td>
<td>--------------------</td>
<td>---------------</td>
<td>--------</td>
<td>----------------</td>
</tr>
<tr>
<td>Brent</td>
<td>Yes</td>
<td>Assessment of all waiting list/homeless cases. Assessment of all transfer cases and approval of recommendations, e.g. management transfers. Placing of ads; arranging viewings; undertaking all verifications.</td>
<td>3 void management officers – 1 per area office. Coordinate voids function and do all viewings and sign ups. Have set viewing days. Estate Management staff verify initial transfer applications and make recommendations as necessary.</td>
<td>Have moved from generic to specialist void staff as liaison and arrangement of viewings was problematic when spread across large number of staff.</td>
<td>No plans for ALMO to have direct links with Locata.</td>
</tr>
</tbody>
</table>

Comparisons show that there are differences in the way in which the lettings function is split between Rehousing and ALMOs. The Hillingdon model is premised on containing the management of voids within the ALMO and a similar approach has been adopted by Harrow. Ealing’s structure is interim as part of the transitional period during which the ALMO will be fully established. Brent’s is similar to Hounslow’s but they are ultimately responsible for all assessments and viewings/void management is undertaken by specialist staff.

There is a strong view across the West London Partnership that representation at the Locata Board should be limited to the Local Authorities in whom the rehousing function is vested.

**Hounslow’s Structure**

As previously stated, the current split of functions between rehousing and Hounslow Homes is little changed from that prior to the establishment of the ALMO.

However, the choice based lettings system has imposed additional layers of activity that were not present in the previous allocations system, including:

- the requirement to have up to date property details that can translate to a meaningful advertisement
- the requirement to advertise all vacancies on a 2 week cycle and build that cycle into the voids and lettings process
- the potential for providing assistance to applicants with the bidding process
- multiple and accompanied viewings

In addition to the above, there has obviously been the requirement to train all relevant staff in a new system.
The Hounslow Homes structure is a mixture of generic front line staff providing customer information and tenancy management (excluding ASB) services and specialist co-ordinating staff.

In managing the choice based lettings scheme, functions are split across a wide range of staff. In particular, there are 23 Customer Information Officers able to make applicant assessments within the ALMO alone in addition to the officers within the rehousing department who undertake assessments for waiting list and homeless applicants.

In addition, the process map set out within Section VI provides a fairly complex structural approach to the division of functional responsibility between rehousing and Hounslow Homes (see page 15/16).

All these factors require the structure to rely heavily on effective liaison and monitoring of the various functions within the voids/lettings process and the potential for performance outcomes and responsibilities to lack clarity.
SECTION X

INCLUSIVITY

Vulnerability

The ODPM’s review of the choice based lettings pilots has identified support to vulnerable applicants as being an area of weakness.

Within the Locata scheme, there is a list of vulnerable applicant categories into which the individual member categories are mapped. The Locata software is able to produce reports relating to vulnerable applicants on the basis of information provided by the partners. However, because of internal ICT difficulties currently experienced by Hounslow, these categories cannot be provided to Locata and therefore reports are not available for this review.

Hounslow’s vulnerable categories are as follows:

- elderly
- people with physical disabilities requiring mobility housing
- recovering mentally ill
- people with learning difficulties
- people with drug and alcohol problems
- children leaving care
- victims of domestic violence
- victims of racial harassment
- ex-offenders
- people requiring supported housing

The Rehousing Department provides the following support to vulnerable applicants:

The Resettlement Team

This team can receive vulnerable applicants via three routes:

1. as direct referrals from a range of agencies providing support to vulnerable applicants seeking housing
2. providing duty cover within the reception and dealing with potentially vulnerable applicants applying in person for housing
3. by taking referrals undergoing assessment within the rehousing team

The resettlement team will:

- assess the applicant’s ability to live independently and refer for supported housing if not
- provide support for bidding
- check is applicants are not bidding
- manage offers – these are passed direct to the resettlement team to liaise with the applicant but can also veto offer if deemed unsuitable
- provide support to applicant for 3-6 months post tenancy commencement

Home Visits

All housing applicants over the age of 50 are visited at home in order to determine their level of need and to check that they understand the bidding process.

Assessment Training

Staff responsible for assessing cases are trained to identify where an applicant may require assistance as a vulnerable applicant.

Medical Assessment

Any applicant identifying medical need will automatically be assessed via the Medical Officer. This process is always managed by a senior member of staff within the Choice Team

Elderly

The recently appointed Senior Choice Officer will provide support to older applicants during the assessment process and will invite non-bidders to attend a meeting to discuss any problems. The applicant will be referred to an advocate if it is considered that this is necessary.

Access to Information

Copies of the Locata magazine are automatically sent to applicants within Bands A and B. Copies are not automatically sent to vulnerable applicants.

Although Hounslow does not have any specific facilities for improved access to information, Locata, with the support of the partnership are developing:

- a freesheet for applicants who are visually impaired
- a signing video for deaf applicants
- creating a web-based scheme guide via ‘Narrator’ software for visually impaired
- developing a makaton service on the web and in hard copy for applicants with learning difficulties

Advocates

Discussions with Hounslow’s Supporting People Co-ordinator have identified a range of views in relation to choice based lettings being raised by support providers within the Borough. A short questionnaire (appendix 2) sent to the providers contracted under Supporting People, as well as the Social Services Older People’s Team. 6 questionnaires were returned and one respondent provided a general response. The client groups on whose behalf the responses were made were: elderly, single homeless, learning difficulties and mental health. The clients groups were mainly moving on from
supported accommodation, with 2 groups living in temporary accommodation and 1 homeless at home. The following is a summary of the responses given:

- most advocates found the bidding system straightforward – only one expressed difficulty
- most clients need assistance with bidding
- positive that client can choose where to live but expectations often unrealistic and have to change where prepared to live because need to move on
- on respondent believes the system gives false hopes to applicants and offers no more than the points based system
- bidding process slows down move-on and prevents supported scheme creating sufficient turnover
- can successfully plan a move because have greater knowledge of property, rent, landlord, etc.
- difficulty in obtaining booklet
- clients with high priority bidding too early in relation to completing support plan and moving on before ready
- frail elderly need support and find timescale for bidding difficult

There will clearly be a limit to the number of referrals that can be managed via the resettlement team and, therefore, Hounslow has put in place some mechanisms that will capture other vulnerable applicants who are not picked up by the resettlement team.

Providing support to vulnerable applicants is resource intensive and it is therefore important that Hounslow has a well developed relationship with a range of relevant agencies, able to provide advocacy support to assist vulnerable applicants.

In order to measure the effectiveness of the structures in place, there is a need to ensure that the Locata system can identify the number and range of vulnerable applicants and run regular reports that, at the very simplest level, identify the bidding activity of such applicants. Interrogation of the list held in relation to applicants banded ‘elderly sheltered’, shows that of 141 applicants listed, 85 have never made a bid. Lack of comprehensive information regarding Hounslow vulnerable applicants generally prevents similar interrogation of other vulnerable groups.
B & ME Groups

The ODPM Review of Pilots identified B & ME households as being a significant group whose applications for housing have increased as a result of choice based lettings.

There is a commitment within the allocation plan to undertake an analysis of the impact of choice based lettings on equality via statistical analysis and consultation with equality and community groups.

Hounslow’s Homeless Strategy indicates that in 2001-02 60% of homeless applications were made by B & ME households set against a total estimated B&ME population within Hounslow of 35.4%

Locata generated reports reflect the percentage of applicants within the cbl system, roughly in line with the B&ME population, as confirmed above.

A Locata generated report, appended to this review at No. 5, shows the breakdown of applicants by ethnic category, set against the various stages within the lettings process. In summary, the following observations can be made:

<table>
<thead>
<tr>
<th></th>
<th>Total on List</th>
<th>Offered</th>
<th>Housed</th>
<th>Live</th>
</tr>
</thead>
<tbody>
<tr>
<td>White (Br/Irish/Other)</td>
<td>45.9%</td>
<td>54.54% (+8.64)</td>
<td>45.34% (-0.56)</td>
<td>50.21%</td>
</tr>
<tr>
<td>All Other, excluding Not Stated</td>
<td>40.21%</td>
<td>39.4% (-0.81)</td>
<td>37.49% (-2.72)</td>
<td>45.20%</td>
</tr>
</tbody>
</table>

‘Total on list’ identifies all categories of applicant at a particular point in time, whether they have been housed, offered, or are still waiting as ‘live’ cases.

The above analysis suggests that white households are bidding more frequently, as reflected by the percentage of offers made, compared to the number of households housed. If the level of offers as reflected in this ‘snapshot’ feeds into the housed percentages, this would show an imbalance in relation to the distribution of housing between the different ethnic groups. Because this report reflects a particular point in time, it is necessary to refer to it on a regularly (monthly) basis in order to identify trends over time.

Locata can generate reports in relation to banding. More useful, would be regular reports to identify the type of property accessed relative to the ethnic category of applicants.

In order to assist groups for whom English is not their first language, Locata provides translations of the basic scheme guide and the confirmation letter to applicants contains a paragraph indicating that translations are available on request.

Hounslow Council does not provide any translated documents relating to the rehousing function but does provide translation facilities within its offices, as well as via language line.
SECTION XI

THE CUSTOMER VIEW

Applicants

In order to gain some feedback from users of the choice based lettings system, the review brief required feedback to be obtained from 30 applicants, including vulnerable applicants. Feedback was sought via telephone using the questionnaire appended to this report at 3. In addition, a focus group was set up to which 7 applicants known to the resettlement team were invited.

Discussions have also been held with 2 tenant representatives, as well attending a Tenants’ Joint Consultative Committee.

Obtaining feedback via the telephone questionnaire has proved very time-consuming, particularly as the information held on telephone contact is often out of date.

Only one applicant attended the focus group.

The breakdown of applicants who have given feedback is as follows:

<table>
<thead>
<tr>
<th>Applicant</th>
<th>Number Interviewed</th>
<th>Number of Vulnerable</th>
<th>Housed</th>
<th>Still on List</th>
</tr>
</thead>
<tbody>
<tr>
<td>Waiting List</td>
<td>10</td>
<td>4</td>
<td></td>
<td>6</td>
</tr>
<tr>
<td>Homeless</td>
<td>8</td>
<td>1</td>
<td>1</td>
<td>6</td>
</tr>
<tr>
<td>Transfer</td>
<td>4</td>
<td></td>
<td>1</td>
<td>3</td>
</tr>
</tbody>
</table>

The key issues emerging from the applicant interviews are:

- all those awaiting housing are bidding except one applicant who is very clear about where they wish to move to and will not bid until the ‘right’ property is advertised
- only one person did not know which band they are in
- although most people knew their banding, they did not necessarily understand it
- concerns that medical banding is not fair – one applicant with severely disabled husband had fought hard to have priority increased
- range of bidding methods but postal and telephone are most popular
- one elderly applicant had very little understanding of the system and had only made one bid and not received a home visit
- one applicant uses the web to track her bids
- concerns about information given when following up status of application, including:
  - being told where they are on the list
  - informed that can only refuse for a good reason
  - if you do not bid it goes against you
Tenant Representatives

Appendix 4 to this report is a submission from Hounslow Federation Tenants and Residents Association that identifies their current concerns with regard to the choice based lettings system.

Whilst it is acknowledged that lack of supply relative to the high demand for property is a significant factor, there is clearly concern that choice as a concept has raised tenants’ expectations unrealistically.

Again, concern is expressed with regard to customer service and the advice given in relation to the choice based lettings scheme.

Feedback from the Tenant’s Joint Consultative Committee attended by the consultant included:

- concern about the perceived fairness of the system, both in terms of how the band was set and whether partner boroughs were using unfair means to withhold properties from the Locata magazine
- a lack of understanding as to how the system works
- complaints about the customer interface, e.g. letters being sent out unsigned, spoken to badly by Hounslow staff
- the short shelf life of the magazine was questioned
- difficulty of getting feedback as to where applicants are and what is happening in the system
- elderly applicants perceived as a particular problem that is not being addressed

Hounslow Homes on behalf of its Tenants

Hounslow Homes submission to this review concludes that:

- the system offers little to tenants wishing to transfer
- the system builds unrealistic hopes and the literature is misleading
- enquiries about transfers have increased since choice introduced
- the tenant movement in Hounslow has expressed concerns about the system

Members

Telephone interviews have taken place with two members, who made the following comments.

- the banding needs review to take account of time waiting as a transfer
- period of occupation prior to applying for a transfer should be taken account of as this disadvantages tenants
- less people coming to members with complaints
- difficult to know where people are on the list, cannot give an idea of how quickly will be housed – no hands on relation ship with the system
- supply and demand is a ‘state secret’
- choice is good
- should people be allowed to say ‘no’ indefinitely?
Focus Groups

To supplement the telephone interviews, as well as the information provided by advocates (See Section X), two focus groups were held - one for B&ME applicants and tenants and one for older applicants and tenants.

B&ME Focus Group

The focus group was attended by 13 people, as follows:

- 2 tenants
- 1 applicant who had just received an offer of housing
- 6 applicants who are still bidding
- 2 community development officers employed by Hounslow Homes
- 1 representative from the Hounslow Refugee Council
- 1 representative from Heston and Cranford Somali Association

The main issues arising from the meeting were as follows:

Applying for Housing

- applicants who did not speak English were offered translation services when requested
- some applicants experienced lack of help from front-line staff in terms of cultural sensitivity
- needed further explanation to understand assessment

Bidding

- size of household is a barrier
- Hounslow Homes representative believes that larger households are disadvantaged by the choice system
- find bidding difficult at first but with community/family support are bidding regularly
- postal voting is the most popular
- believe telephone bidding to be expensive – 50p per minute and often have to hold on
- time delay in receiving coupons when more needed
- two applicants had their banding changed to a lower band without explanation

Offers

- property described was not what the applicant wanted
- one applicant had been offered a property as a management transfer but on viewing it was designated for a disabled household and offer withdrawn
- applicants suggested that they were being pressurised to take an offer and felt that not doing so would reduce their chances of being shortlisted – one applicant had
accepted a flat on the basis that she would immediately apply for a transfer elsewhere
• management transfer bidding for other than ‘like for like’ felt she was disadvantaged in terms of shortlisting as a result

Being Housed

• one tenant had refused property viewed and continued to bid and is happy with the home she now has, but still felt there had been pressure to take the property that she refused

General

• the majority of attendees at the focus group were from the Somali community
• Hounslow Homes employs Community Development Workers to provide support to tenants but no formal links with the Council in order to provide support to applicants
• no formal or clear lines of communication between community representatives and Hounslow Council
• examples of lack of or very slow response to problems being raised on behalf of applicants
• a perception that there is a lack of cultural sensitivity displayed by front-line staff
• management transfers being required to bid for ‘like for like’ seen as counter productive

Older Persons Focus Group

The focus group was attended by 5 people as follows:

• one elderly leaseholder wishing to transfer to rented accommodation
• one tenant wishing to move to lower floor or sheltered accommodation
• three private tenants needing one bedroom accommodation

The main issues arising from the meeting are as follows:

Applying

• home visits where made to applicants were viewed positively
• one applicant had not received a home visit
• transfer applicant waited from January to August in order to have banding status confirmed
• one applicant was confused about re-registration process and no longer knew what band they are in
• one applicant, although bidding, did not know what band they were in

Bidding

• a range of methods used – coupons, text and telephone
• one applicant did not know about coupons
• one applicant could not use telephone because of hearing difficulties
• one applicant had been contacted as she had not been bidding and had commenced bidding again

Offers

• one applicant had refused an offer because the rent advertised was less than that for the property – possibly because of the service charge
• some applicants were bidding cross borough
• one applicant wanted to relocate to sheltered elsewhere in the country but had not been given the option of using HOMES
• a sense that sheltered being sold hard

General

• tenant experienced difficulties in speaking to local staff about problems
SECTION XII

CONCLUSIONS

The conclusions have been set out in response to the outputs sought from this review.

The Efficiency of the Lettings System

There are important differences of opinion between the Council and Hounslow Homes that are highlighted as part of this review and whose resolution, in whole or part, must form the basis of the recommendations made.

Both Hounslow Homes and Rehousing Department are settling into new structures and ways of working and some joint working has emerged that has produced positive outcomes in relation to the shared management of the lettings process.

The voids performance is improving but is still out of line with peers and the negative impact that choice appears to have created is not in common with the findings of the other pilots.

It is vital that improved performance in relation to voids is maintained but this is made difficult by the problems encountered with sheltered housing lettings.

Direct offers are inevitable but there is pressure to increase these and potentially undermine the whole ethos of the choice system. Offers outside of the system must be maintained as exceptions and other means sought in order to meet the needs of specific groups within the applicant categories.

Policy and procedure to support the lettings function is not well developed, nor is there a sense of joint development of such policy and procedure to ensure that the shared function is reflected in working documents. In particular, areas where the system can be seen to have been bypassed are not regularly reported or monitored, e.g. direct lettings and bypassing bidders in line with policy.

Key performance indicators are not evident at all stages of the lettings process and ICT reporting is insufficiently developed to ensure that all activities can be captured within a single management report. There is still too much reliance upon manual recording of activities and much of the reporting is reactive, rather than pro-active as a result.

The lettings function within the ALMO is spread across a wide range of staff, with a mixture of generic and specialist roles. The voids and lettings co-ordinators do not have any line management function and therefore can only inform rather than direct the process.
Customer Satisfaction

This is mixed and analysis does not suggest that any specific applicant group is more or less satisfied with the choice system. Account must also be taken here of the small sample of applicants interviewed.

Nevertheless, there are consistent concerns about ‘front end’ information that is provided when applicants make enquiries about the progress or status of their application.

Concern has also been expressed about the potential negative impact on tenant transfers by the transition from points to banding and the fact that time waiting in overcrowded conditions has not been taken account of.

Another concern is the ‘image’ created by the Locata magazine and its potential to give the impression that more properties are available than is actually the case. The bidding feedback contained in the magazine is also considered misleading, rather than informative. This is of particular concern to tenant applicants who have seen their choice eroded by a diminution of the number of properties made available within the allocation plan.

Overall, the promotion of choice needs to be considered in a wider context. Supply and demand issues remain a constant problem and it will not be possible to meet applicants’ needs in terms of choice, particularly those in lower bands. It is therefore important to expand choice and not simply see it within the narrow definition of where and what type of property. Choice should embrace different tenures and different means of resolving a housing problem, e.g. via mutual exchange.

Audit Satisfaction

The existing structures have created separate responsibilities for assessment, approval and allocation.

A limited audit of files was not positive in terms of the quality of information recorded.

Delivering the Council’s Allocation Policy

Taken overall, the choice based system appears to be meeting the Council’s allocation objectives but it is difficult to make historic comparisons other than at a macro level.

There are no systematic reports that provide greater detail for the allocation plan, either in relation to how the specific allocation quotas are derived in relation to policy requirements and the various waiting list categories nor in relation to how specific groups are fairing under the choice system.

Tenants are seen overall to fair less well within the allocation plan. However, it is not evident that this is as a result of the choice system, rather as a result of the allocation policy which is pressurised in relation to the need to meet the needs of homeless households. The allocations policy does not focus on developments within
the Locata system that could assist tenants and balance out the negative messages of reduced allocations.

**Housing Act Compliance and Government Guidance**

Membership of the West London Partnership has provided very positive outcomes for Hounslow in relation to developing and sustaining the largest choice based lettings system.

The partnership not only complies with Government requirements in relation to offering choice but also supports the sub-regional funding structures that are now in place.

It is not clear whether the partnership has tested its lettings function against the ‘Camden’ judgement in the context of ‘reasonable preference for homeless households’.

**Equality Issues**

There are a number of structures and initiatives in place that provide a range of levels of support to vulnerable applicants. In particular, the resettlement team functions very well and provides a high level of service.

Although a member of the Choice Team takes responsibility for sheltered housing lettings, this has tended to be driven by the voids problem, rather than the applicants’ needs. It is acknowledged that this area is being further developed but there is a lack of systematic follow up and support to elderly applicants.

Concerns have been raised by advocates for vulnerable applicants and it is not clear how well the network of relationships with such groups has been developed, both to maximise their support with advocacy as well as foster better understanding of the system.

B&ME monitoring is not undertaken systematically and there is no standard approach to the translation of documents.

The experiences as expressed during the B&ME focus group suggest that further development of support services is required to ensure that it is given as a matter of course, rather than when requested by the individual. As well as the practical support required in relation to language, there is also a need for better training in cultural awareness to ensure that front-line services respond appropriate to individual needs.

Communication issues with B&ME groups were not viewed favourably by the attendees at the B&ME focus group, with long delays or no response being received to queries.

Lack of formal networks with B&ME community representatives prevent effective working and broader community understanding and knowledge of the cbl system.
The developments within the wider partnership of Locata services for the visually impaired and other vulnerable groups are excellent and an example of best practice within the choice arena.

**Training of Staff**

Training of staff is undertaken internally, both by members of the rehousing team and the allocations co-ordinator within Hounslow Homes. Cascade training is also used where officers train other colleagues.

The main issue for training is the high number of staff involved in the lettings process and the impact of staff turnover.

The lack of comprehensive and simple to understand procedures does not ensure that training is supplemented with ongoing reference that can ensure consistent standards of service delivery.

As stated above, there is potentially a need to improve cultural awareness training.

**Value for Money**

Although the brief for this review did not require an assessment of value for money, this does need to be considered at least at a qualitative level.

Choice based lettings has inevitably given rise to additional direct costs, including:

- increase in staff numbers in the rehousing team
- membership of Locata and contribution to development costs

In addition, Hounslow Homes suggest that indirect costs have emerged as a result of an increase in voids loss, which is considered to have arisen as a result of the introduction of cbl.

This must be seen in the context of the Government’s requirements that choice be offered to applicants by 2010 and therefore, all Council will experience at the very least, research and development costs in setting up an appropriate system of choice.

Value for money in relation to choice based lettings can be derived from the partnership that underpins the Locata system, whereby the alliance developed with other West London Councils mirrors the Government’s sub-regional approach to funding and housing development generally.

The development of the relationship, both in terms of joint working and the Locata system, can give tenants a greater opportunity for choice, for example, by accessing a potentially powerful mutual exchange bureau, as well as having options to bid across the West London areas covered by the partnership.

Joint working will also bring opportunities for the partners to share experiences and develop opportunities in a cost effective way, taking advantage of economies of scale and removing the need for each partner to ‘reinvent the wheel’ when new initiatives are developed.
SECTION XIII

RECOMMENDATIONS

1. The current structure for managing the voids and lettings process is complex and does not enable clear functional breaks to divide responsibility and performance outcomes.

The structure is also made more complex by the inability to manage the entire voids and lettings process via a software package that is also able to track performance against KPIs and produce reports that can identify clearly where weaknesses are occurring within the system.

Lack of well developed and easy to manage policy and procedure also mitigate against managing a function across two business areas.

It is understood that the Council is not prepared to consider, at this stage, transferring the whole of the rehousing function to the ALMO and this review does not recommend such a step as necessary. However, it is recommended to review the structure and consider a split of functions that more readily divides the responsibilities for lettings and voids. It is suggested that the Hillingdon model is considered, whereby the Choice Team is responsible for all assessments and verifications (including tenant transfers), as well as loading information on to the Locata software. Hounslow Homes would then manage all shortlists from inception to tenancy start. This would enable the voids management function to be better controlled by Hounslow Homes as well as provide a better audit trail in terms of the split of functions.

In addition, it is recommended that Hounslow Homes give consideration to managing the revised split of function within a specialist team who have expert knowledge of the choice based lettings system in terms of managing shortlists and are able to manage the voids process across all neighbourhoods.

2. To underpin any revision of the split of functions, a Service Level Agreement should be put in place between the Council and Hounslow Homes reflecting the parties’ responsibilities and performance requirements. A draft has been developed and should be worked up jointly based on any changes resulting from this review.

3. By introducing a split of function, as above, this will also address some of the other issues raised within the review:

- the number of staff involved in the assessment process will reduce and therefore reduce training requirements and improve consistency and expertise within this area of work
- estate management staff would be able to provide more advocacy support to their tenants without fear of conflicting interests. This would be of particular advantage in relation to management transfers in terms of the limited time available for bidding and hopefully ensure that bids are made for appropriate properties
4. Policy and procedure relating to the choice based lettings system needs to be developed more quickly and produced in easy to follow formats, with key performance indicators and targets clearly shown and applied to all significant stages of the processes involved. Using a joint working approach, involving representatives of all parties involved in the rehousing process is recommended.

5. Similarly, there must be better developed reporting of all stages of the voids/ process in order to better identify trends, problems and responsibilities for action.

Systematic reporting must be developed in relation to key areas of the rehousing process, particularly where exceptions are made to the standard process, e.g.

- bidders bypassed – reasons and frequency (this is now implemented)
- directs offers – reasons, frequency and trends (now implemented)
- non-bidders – on a category basis, e.g. management transfers, elderly, vulnerable, with designated officers required to make contact and agree an action plan with the applicant

6. Applicant records need to be improved. Evidence needs to be available to show how assessments have been made and each stage of the lettings process needs to be charted throughout an applicant’s file. Some standard pro formas are being developed but this needs to be reviewed urgently to ensure that records are meaningful.

7. There is a general need to improve the public relations aspect of choice. Perceptions of poor customer service and misleading literature need to be responded to positively.

It is suggested that regular focus group meetings are held with invited applicants to discuss the literature that is supplied and get feedback on areas where greater clarity is needed. As an example, the bidding analysis provided in the Locata magazine is intended to create a transparent picture of ‘who got what’ but when a high banded applicant who appears to have only been waiting for two weeks is successful, this gives rise to confusion which cannot be adequately explained within the publication.

In addition, tenants can be trained to undertake mystery shopping exercises in order to provide regular feedback on the standard of customer services provided by the Council.

8. Significantly, the concept of choice needs to be broadened. Hounslow must exploit its membership of the West London Partnership and be seen actively to pursue developments and opportunities that can provide greater choice for all applicants, but specifically those who receive the smallest allocations of available housing. This would include:

- successfully developing relationships with private landlords in order to offer alternative tenures to applicants – this is an area where the pilots have found it difficult to engage but there are examples of good practice that can be accessed
- using the Locata magazine to publicise other tenures, such as shared ownership, market rents, keyworker accommodation
- developing the combined Partnership registers to create a West London mutual exchange bureau

Positive development of the choice based system, coupled with effective public relations management will do much to mitigate against applicant frustrations and perceptions, particularly as over time there will be a significant number of applicants who have bid and still not accessed a home of their choice.

9. Systematic reporting must be put in place to support the development and delivery of the Council's allocation plan. The Locata reporting facility has the capacity to create a wide range of reports and it is suggested that the following be considered:

- tenancy sustainment – look at trends over time – does choice have a positive impact?
- the level of non-bidders – are applicants using the system and what happens when they do not
- non-bidders within certain applicant categories – does non-bidding affect the delivery of the allocation plan?
- refusal rates – are there trends in relation to particular properties/estates and what action being taken?
- ethnic monitoring – B&ME groups housed and the quality of property accessed
- tenant transfers – by banding and type of property accessed

10. The effective development of resettlement support for vulnerable tenants should be built on in order to maximise the opportunities for support for such applicants.

It is recommended that a network of potential support agencies be actively developed in order to maximise opportunities for advocacy to applicants not seen by the resettlement team.

11. At present there is a member of the Choice Team responsibility for sheltered housing. This involves making direct offers to applicants which, although expedient, undermines the ethos of the choice based lettings system.

As part of the Council's overall strategy in relation to sheltered housing, sheltered applicants must be more systematically supported in order to maximise bidding and thus make inroads into the problems with letting sheltered vacancies. A significant number of sheltered applicants have never bid and the reasons for this need to be investigated and managed in a way that suits the needs of this client group.

12. As well as providing more systematic reporting as to the letting of homes to B&ME communities (see recommendation 9) it is recommended that improvements are made to the range of literature available in other languages as it relates to the choice based lettings process.

In addition, as with vulnerable applicants, there is a need to develop more formal links with community support agencies in order to better inform advocates as to the working of the cbl system. Developing opportunities to use such agencies to act as referral bodies for applicants and assist with the bidding process and problem resolution should be seen as a priority.
## APPENDIX 1

Audit of Applicant Files

Files were audited in order to confirm evidence of the following elements of the lettings process:

<table>
<thead>
<tr>
<th>Case</th>
<th>Application Form</th>
<th>Confirmation of band and how assessed</th>
<th>Identity of assessor</th>
<th>Medical assessment or other supporting information if relevant</th>
<th>Confirmation to applicant of banding and preliminary info</th>
<th>Home Visit if relevant</th>
<th>Offers</th>
<th>Verification confirm and who</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>yes, very detailed</td>
<td>no – this is sent by Locata with no copy to Hounslow</td>
<td>no</td>
<td>direct offer but no indication as to why</td>
<td>no</td>
</tr>
<tr>
<td>2</td>
<td>yes - sheltered</td>
<td>no</td>
<td>no</td>
<td>n/a</td>
<td>as above</td>
<td>yes</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>3</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>n/a</td>
<td>as above</td>
<td>n/a</td>
<td>yes</td>
<td>yes – too identify or verification</td>
</tr>
<tr>
<td>4</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>n/a</td>
<td>as above</td>
<td>n/a</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>5</td>
<td>yes</td>
<td>no – pre-dates banding and no indication as to how determined</td>
<td>no</td>
<td>n/a</td>
<td>as above</td>
<td>yes</td>
<td>yes</td>
<td>no</td>
</tr>
<tr>
<td>6</td>
<td>yes</td>
<td>no</td>
<td>no</td>
<td>yes</td>
<td>confirmation of banding sent by Hounslow because a medical case</td>
<td>yes</td>
<td>yes</td>
<td>no</td>
</tr>
</tbody>
</table>

In general the files did not clearly document the process from application to being housed.

In particular, there is no means of checking how a banding assessment was determined and by whom, nor is there any means of knowing how a pointed applicant’s case was transferred to a band.

Medical and other supporting documentation is thorough.
A direct offer was made to one applicant but no explanation as to why and no clear authority on the file.

Not all files contained verification requests as this is not a standard requirement. However, where one was requested it was not completed within the target time and had no means of identifying who had carried out the verification visit.

Not all files contained refusal information presumably because applicants had accepted their first offer post bidding. However, the files do not give any information post the offer letter to confirm that the applicant has accepted.

The letters being sent to applicants are various in their layout and wording. It is understood that these are in the process of being updated. However, it is of concern to see letters stating ‘if you fail to contact us by this date, the offer will be withdrawn and it will count against you’.

We are informed that this is blanked out on the top copy of the letter but is not good practice and needs to be amended as soon as possible.

Tick box pro-formas that can support documenting the process would assist and can be signed off by the relevant responsible officers. This could also confirm whether Locata has sent out the confirmation of banding and initial information to the applicant – this information is presumably held on the Locata system.
APPENDIX 2

HOUNSLOW – REVIEW OF CHOICE BASED LETTINGS

VULNERABLE CLIENTS

<table>
<thead>
<tr>
<th>QUESTION</th>
<th>RESPONSE</th>
</tr>
</thead>
<tbody>
<tr>
<td>What client group do you work for?</td>
<td>Mental Health</td>
</tr>
<tr>
<td></td>
<td>Learning Difficulties</td>
</tr>
<tr>
<td></td>
<td>Single Homeless</td>
</tr>
<tr>
<td></td>
<td>Elderly</td>
</tr>
<tr>
<td></td>
<td>Other, please specify</td>
</tr>
<tr>
<td>Are any of the clients with whom you work awaiting rehousing by Hounslow LA?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td>If yes, are they…..</td>
<td>Moving on from supported accom?</td>
</tr>
<tr>
<td></td>
<td>Accepted as homeless and living in temp accommodation?</td>
</tr>
<tr>
<td></td>
<td>Other, please specify</td>
</tr>
<tr>
<td>Can your clients bid for properties without assistance?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td>If requiring assistance, do you, as advocate find the system for bidding straightforward?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td>If no, please explain problems.</td>
<td></td>
</tr>
<tr>
<td>If clients have bid successfully, are they happy with the outcome?</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>No</td>
</tr>
<tr>
<td>If no, please expand,</td>
<td></td>
</tr>
<tr>
<td>Generally, please comment on the choice based lettings system and any positive/negative implications for your clients</td>
<td></td>
</tr>
</tbody>
</table>
Many thanks for assisting with this review.

Name:
Job Title:
**Category of Applicant**

**Where residing presently**

**Reason for applying for housing**

**How long waiting – either as applicant or until housed**

**Vulnerable? – confirm vulnerability**

**Size of Household**

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
</tr>
</thead>
<tbody>
<tr>
<td>Who did you apply to/where did you apply for housing/rehousing?</td>
<td></td>
</tr>
<tr>
<td>How did you know who/where to apply to/contact?</td>
<td></td>
</tr>
<tr>
<td>Did you complete an application form with/without assistance?</td>
<td></td>
</tr>
<tr>
<td>If assisted, by whom</td>
<td></td>
</tr>
<tr>
<td>Did the Local Authority explain the basis on which your application would be assessed?</td>
<td>Yes/no and detail, e.g. level of understanding/problems and how these were resolved:</td>
</tr>
<tr>
<td>Did the Local Authority explain how you would be offered a new home?</td>
<td>As above:</td>
</tr>
<tr>
<td>Question</td>
<td>Response</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Were/are you happy with the assessment of your priority?</td>
<td></td>
</tr>
<tr>
<td>If not happy, what did you do and what was the outcome?</td>
<td></td>
</tr>
<tr>
<td>Are you happy with the outcome?</td>
<td></td>
</tr>
<tr>
<td>Do you understand why your application was banded at this level?</td>
<td></td>
</tr>
<tr>
<td>Do you know how to bid for property? Where do they get info on what is</td>
<td>Yes – who explained? If not, why not.</td>
</tr>
<tr>
<td>available?</td>
<td></td>
</tr>
<tr>
<td>Have you made any bids for a new home?</td>
<td>How many and method.</td>
</tr>
<tr>
<td>Did you bid beyond the Borough and why?</td>
<td></td>
</tr>
<tr>
<td>If a bid/bids has been made, what was the outcome?</td>
<td>Probe in terms of failed bids and impact on applicant.</td>
</tr>
<tr>
<td>Do you think the bidding process is straightforward?</td>
<td>Probe if the applicant was assisted with bidding.</td>
</tr>
<tr>
<td>If not, what would make it easier for you?</td>
<td></td>
</tr>
<tr>
<td>If you haven’t made any bids, why not.</td>
<td>In particular identify problems with the system.</td>
</tr>
<tr>
<td>Has anybody contacted you to check that you have bid/will be bidding?</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Response</td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>If successful bid, were you assisted with viewing?</td>
<td>testing efficiency?</td>
</tr>
<tr>
<td>Were there any problems with the viewing?</td>
<td></td>
</tr>
<tr>
<td>If you were offered the property, how long after viewing?</td>
<td>Probe if a problem.</td>
</tr>
<tr>
<td>Are you happy with the outcome?</td>
<td>i.e. is property what and where they wanted, if a compromise, explain.</td>
</tr>
<tr>
<td>Do you contact anybody in order to check the status/progress of your application?</td>
<td></td>
</tr>
<tr>
<td>Do you think the information provided about properties is sufficient in order to make a choice?</td>
<td></td>
</tr>
<tr>
<td>Do you think staff understand the system and explain things well enough to applicants?</td>
<td></td>
</tr>
<tr>
<td>Do you have any concerns about the system?</td>
<td>probe for tenant applicants any comparisons with Locata –v- previous transfer system?</td>
</tr>
<tr>
<td>What do you think is good about the system?</td>
<td>probe if consider it fair/transparent</td>
</tr>
<tr>
<td>Question</td>
<td>Response</td>
</tr>
<tr>
<td>------------------------------------------</td>
<td>----------</td>
</tr>
<tr>
<td>Anything you would wish to change?</td>
<td></td>
</tr>
<tr>
<td>Any other comments</td>
<td></td>
</tr>
</tbody>
</table>

Date Completed:
APPENDIX 4
HFTRA SUBMISSION

Locata Review: Tenants Views of Inconsistencies and Flaws in the Present System (Part One):

Tenants see the way Locata is operating as unfair. The aims expressed at its introduction of more “choice” seem to many not to be being met. The reality is that because of supply constraints, the present system is in fact probably no more or less fair than the earlier one. There is an element of choice but in reality some bidders have little hope of getting the property that they want. Where Locata may be succeeding is in offering a greater degree of transparency. This benefit is however wiped out by the level of apparent inaccuracy and inconsistency in how the rules are being applied. A fuller report focusing on these apparent inaccuracies is in part two of this report (to follow).

There are other issues of concern, these include:

- Failures in properly communicating and administering “ring-fence” agreements during regeneration schemes
- Poor levels of customer care
- The short shelf-life of Locata magazine and how well this is understood by applicants
- Problems with understanding the protocol for management action outside of the bidding process
- Lack of understanding about how disabled and elderly tenants can be considered for moves to ground floor accommodation; whether long-term tenants who become infirm or disabled should be expected to bid for ground floor properties in the same building
- Worries about how overcrowded families who have been long-term tenants are treated compared to new applicants in temporary accommodation
- The misrepresentation of choice to elderly tenants in under-occupied properties. Able older persons being persuaded into sheltered accommodation where there are more vacancies
- The existence of long-term vacant properties*

George Fry
Chair HFTRA
07796 683268

*e.g. In the Chiswick area alone anecdotal evidence from tenants suggest the following:
5 Carfax Court W4 empty for 10 weeks
Flat in Glebe Court W4 empty 12 weeks
2 flats in Bolton Road W4 long-term vacant
Flat 3 No 11 Bolton Road W4 empty 6 weeks
APPENDIX 5 – LOCATA ETHNIC MONITORING STATISTICS

Data last updated: 27/09/2004

<table>
<thead>
<tr>
<th>Category</th>
<th>Qty</th>
<th>%</th>
<th>Variance</th>
<th>Qty</th>
<th>%</th>
<th>Variance</th>
</tr>
</thead>
<tbody>
<tr>
<td>White - British</td>
<td>5873</td>
<td>37.23%</td>
<td></td>
<td>581</td>
<td>38.97%</td>
<td>1.74%</td>
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<tr>
<td>White - Irish</td>
<td>268</td>
<td>1.70%</td>
<td></td>
<td>26</td>
<td>1.74%</td>
<td>0.05%</td>
</tr>
<tr>
<td>White - Other</td>
<td>1100</td>
<td>6.97%</td>
<td></td>
<td>69</td>
<td>4.63%</td>
<td>-2.34%</td>
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<tr>
<td>Mixed - White and Black</td>
<td>42</td>
<td>0.27%</td>
<td></td>
<td>6</td>
<td>0.40%</td>
<td>0.14%</td>
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<tr>
<td>Mixed - White and Asian</td>
<td>23</td>
<td>0.15%</td>
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<td>2</td>
<td>0.13%</td>
<td>-0.01%</td>
</tr>
<tr>
<td>Mixed - Other</td>
<td>224</td>
<td>1.42%</td>
<td></td>
<td>15</td>
<td>1.01%</td>
<td>-0.41%</td>
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<tr>
<td>Asian or Asian British - Indian</td>
<td>166</td>
<td>1.05%</td>
<td></td>
<td>14</td>
<td>0.94%</td>
<td>-0.11%</td>
</tr>
<tr>
<td>Asian or Asian British - Pakistani</td>
<td>765</td>
<td>4.85%</td>
<td></td>
<td>57</td>
<td>3.82%</td>
<td>-1.03%</td>
</tr>
<tr>
<td>Asian or Asian British - Bangladeshi</td>
<td>93</td>
<td>0.59%</td>
<td></td>
<td>7</td>
<td>0.47%</td>
<td>-0.12%</td>
</tr>
<tr>
<td>Asian or Asian British - Other</td>
<td>2174</td>
<td>13.78%</td>
<td></td>
<td>169</td>
<td>11.33%</td>
<td>-2.45%</td>
</tr>
<tr>
<td>Black or Black British - Caribbean</td>
<td>242</td>
<td>1.53%</td>
<td></td>
<td>24</td>
<td>1.61%</td>
<td>0.08%</td>
</tr>
<tr>
<td>Black or Black British - African</td>
<td>1328</td>
<td>8.42%</td>
<td></td>
<td>146</td>
<td>9.79%</td>
<td>1.37%</td>
</tr>
<tr>
<td>Black or Black British - other</td>
<td>581</td>
<td>3.68%</td>
<td></td>
<td>59</td>
<td>3.96%</td>
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</tr>
<tr>
<td>Chinese</td>
<td>23</td>
<td>0.15%</td>
<td></td>
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<td>0.13%</td>
<td>-0.01%</td>
</tr>
<tr>
<td>Other</td>
<td>683</td>
<td>4.33%</td>
<td></td>
<td>50</td>
<td>3.35%</td>
<td>-0.98%</td>
</tr>
<tr>
<td>Not Stated</td>
<td>2191</td>
<td>13.89%</td>
<td></td>
<td>264</td>
<td>17.71%</td>
<td>3.82%</td>
</tr>
</tbody>
</table>

Total Members on List: 15776 (100.00%)

<table>
<thead>
<tr>
<th>Category</th>
<th>Qty</th>
<th>%</th>
<th>Variance</th>
<th>Qty</th>
<th>%</th>
<th>Variance</th>
</tr>
</thead>
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<tr>
<td>Offered</td>
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<td>43.94%</td>
<td>6.71%</td>
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<td>N/A</td>
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<td>0.57%</td>
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<td>N/A</td>
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<tr>
<td></td>
<td>11</td>
<td>8.33%</td>
<td>1.36%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0.00%</td>
<td>-0.27%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0.00%</td>
<td>-0.15%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>1.52%</td>
<td>0.10%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>0</td>
<td>0.00%</td>
<td>-1.05%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>5</td>
<td>3.79%</td>
<td>-1.06%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
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<td>2</td>
<td>1.52%</td>
<td>0.93%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>18</td>
<td>13.64%</td>
<td>-0.14%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>2</td>
<td>1.52%</td>
<td>-0.02%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>12</td>
<td>9.09%</td>
<td>0.67%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td></td>
<td>6</td>
<td>4.55%</td>
<td>0.86%</td>
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<td>N/A</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>0.76%</td>
<td>0.61%</td>
<td>0</td>
<td>N/A</td>
<td>N/A</td>
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<tr>
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<td>4</td>
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<td>-1.30%</td>
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<td>8</td>
<td>6.06%</td>
<td>-7.83%</td>
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</tr>
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<td>132</td>
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Housed: 1491 (100.00%)

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<th>Variance</th>
<th>Qty</th>
<th>%</th>
<th>Variance</th>
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<td>N/A</td>
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Removed: 3849 (100.00%)