



Glasgow West Housing Association (GWHA) gives its thanks to all individuals who took part in the Housing Allocations Policy (HAP) consultation. All of the feedback received has been used to critique, analyse and develop our new Housing Allocations Policy which will be implemented from 1st May 2019.

INTRODUCTION

GWHA has now concluded its consultation on changes to the HAP, as required by the implementation of the Housing (Scotland) Act 2014.

All Tenants, Housing Applicants and the Burnbank Gardens Registered Tenant Organisation (RTO) were invited to take part in the consultation through a series of events and publications which ranged from newsletters, website articles, letters, emails, text messages and online surveys. Additionally, daytime, weekend and evening workshops, and focus sessions were conducted. The consultation design offered maximum accessibility with opportunities to take part via a variety of methods over a six-month period between 11th September 2018 – 12th March 2019.

The consultation was an integral part in the Management Committee's decision making when shaping GWHA's new Housing Allocations Policy, the feedback from which will be outlined in this report in the following format:

1. Preliminary consultation
2. Annual Staff Conference
3. Survey responses
4. Focus group session

1. PRELIMINARY CONSULTATION

Consultation began prior to the inception of the new policy with a focus session on 3rd October 2018 to gather feedback from interested parties on the existing policy. The event was publicised in the tenant newsletter and via the Association's website, and was attended by seven existing GWHA Tenants, including one representative of Burnbank Gardens RTO.

Attendees were asked to consider and comment on the existing HAP. Feedback was generally positive, although it was perceived that it lacked clarity in some areas. Positive feedback was received regarding the provisions within the policy for dealing with domestic abuse cases and shared parental rights. Comments reflected

concerns about how those in employment, particularly the "working poor" should be empowered through the HAP, which generated discussion and explanation about GWHA's inability to take an applicant's income into account when allocating social housing, in compliance with the Housing (Scotland) Act 2001. Other themes that arose through the focus group discussions included under occupancy and the need to facilitate balanced communities, while taking account of needs other than medical.

2. ANNUAL TENANT'S CONFERENCE (ATC)

A consultation workshop was held at the ATC on Saturday 26th January 2019, invitations to which were sent to every GWHA tenant via post. The workshop was advertised on the invitations in addition to our tenant newsletter, online tenant portal and website. A presentation was delivered on the Housing (Scotland) Act 2014 requirements and the HAP review, followed by a lively Q&A feedback session exploring areas such as support arrangements and how GWHA should make best use of housing stock. Fifty-two tenants attended the ATC, the majority of whom attended the workshop. Twenty-one feedback forms were completed by attendees at the end of the workshop.



Does the policy seem fair?

19 respondents answered this question, 18 of whom responded positively (95%).

What do you think will work well?

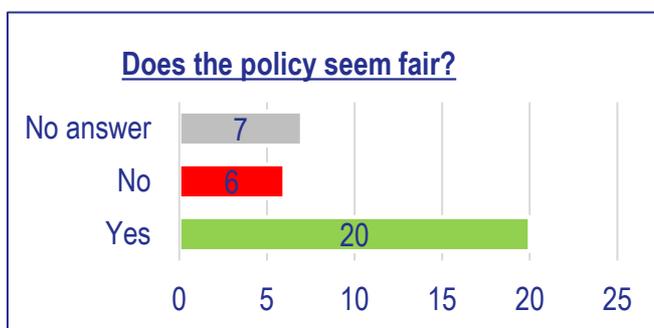
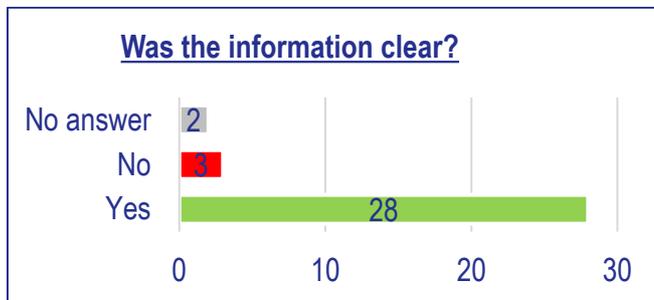
"Transparency" "new housing policy"
"RE affordability, more info on what GWHA can achieve"
"People with medical points regularly contacted to ensure they are not being lost in process of transfers"

What do you think will not work well, or is missing?

"Nothing. Doing a good job" "Generalization"
"Thoughts on environment" "Society has many issues which cannot be solved solely by GWHA"

GWHA response: GWHA hopes to contribute effectively towards the community through the fair implementation of its Allocations Policy. We continuously monitor our environment through our Estates Team and will keep tenants informed of upcoming projects.

A copy of the new draft policy was published on the Association's website. Every applicant on GWHA's housing register was then invited via email, text message or letter to review and take part in a 4-question survey. A total of 33 responses were received:



"The policy seems relatively fair. I would not like to see any group disadvantaged or another group being overly advantaged."

"No - why are armed forces prioritised over people leaving violent relationships and disabled people. They get a bonus on leaving the Services, why can't they use that for a deposit?"

GWHA response: The Local Authority has pledged to uphold The Armed Forces Covenant which states: "Those who serve in the Armed Forces, whether regular or Reserve, or those who have served in the past, should not be disadvantaged in the provision of public services". To reflect this, GWHA has taken the decision to group those assessed as 'statutory homeless' by the Local Authority, and those leaving the forces without a home together. However, by having three groups (Homeless, Transfer and Housing) we can ensure that each group receives an agreed annual percentage of lets. Those leaving the armed forces may still opt to explore other housing options such as home ownership or private renting.

What do you think will work well?

"Gives people on the waiting list a fair chance"

"All seems fairly well structured and balanced"

"The fact that there now seems to be a better attitude towards health conditions"

"The strategy for overcrowding/under occupation"

What do you think will not work well, or is missing?

"Lack of 'social' points, e.g. requiring to remain in the neighbourhood to continue uninterrupted schooling; access to family and/or cultural support"

GWHA response: Social points were considered, though the concept was not included due to GWHA's aim to develop a 'needs-based' system in accordance with legislation. Additionally, the subjective nature of an individual's social needs or aspirations would make the parameters difficult to define and administer.

"I'm not sure if people who are already social landlord tenants in under occupied accommodation should be given such high priority"

GWHA response: The Housing (Scotland) Act 2014 specifies that under-occupied RSL tenants are to be incorporated into Housing Allocations Policies as one of three groups to receive 'reasonable preference'.

"Disability needs! Although the strategy acknowledges bed blocking, it puts additional stress on people who have disabilities. Do you not think we get assessed enough by ESA/PIP etc.? Surely receipt of PIP should be enough to qualify? Without additional tests?"

GWHA response: We hope the new policy will empower people with medical needs. Assessment of such needs will be bespoke to the individual and flexible, taking account of a variety of factors.

"Nothing it is well structured"

4. FINAL CONSULTATION

A final focus group took place on 6th March 2019 and was attended by six existing GWA tenants and two housing list applicants. All applicants were notified via email, text message or letter, and a bulletin was published on the Association's website. Tenants who had expressed a desire to participate further in the consultation process were formally invited to attend, as was the Burnbank Gardens RTO. The focus group was interactive in nature, with attendees split into two groups, given 3 typical housing scenarios and asked to decide how the application would be assessed in accordance with the draft policy framework, including awarding points. The session generated healthy debate amongst attendees who were asked to critically appraise the draft framework. The following feedback was received:

Under occupancy should go in applicants favour. ✓

Med A should only be in exceptional circumstances, if chronically or terminally ill. ✓

Medical conditions are more important to consider as opposed to overcrowding ✓

Greater demand for GWA properties due to them being in the West End. Applicants should have reasonable justifications for wanting to move to West End and it shouldn't just be aspirational. ✗

The Housing Scotland Act 2014 entitles all applicants to be admitted to the Housing List unless they are under 16 years of age.

Current GWA tenants with medical needs who require a transfer should be given much more priority than those just wanting to move to the area. ✗

Legislation does not allow RSLs to take into account the length of time an applicant has lived in the area when making an allocation. However, by having three groups (Homeless, Transfer and Housing) we can ensure that each group receives an agreed annual percentage of lets.

Transfer applicants should have their expectations managed when needing a ground floor flat and may need to accept that they will need to move out with the community they currently live in. ✓

Discussion around Section 5 process and that Case Workers should be managing expectations of homeless applicants ✓

Wording between Med A & Med B is not clear or distinctive enough. 'Severely disabled' is a very subjective term. Med B should be awarded for serious medical conditions with Med A reserved absolutely for those most in need. ✓

It is necessary to ask for proof of Medical Conditions and pregnancy. ✓

Ages that children should share a bedroom up until seem fair and appropriate ✓

There should be a bigger distinction between 'Threatened with Homelessness' and 'Insecurity of Tenure' points – the policy needs to state whether applicants can qualify for both or only one. ✓

CONCLUSION

The feedback gathered through the consultation process was invaluable to GWA, helping the Association to capture a clear picture of community priorities against the legislative backdrop in which our policy must operate.

The feedback, in many ways, validated the content within the draft policy with responses indicating agreement that

- medical conditions should be assessed higher than overcrowding
- the policy is right to assess housing needs rather than aspirations
- RSL tenants under-occupying their homes should be equally empowered through the policy in comparison with those overcrowding their homes
- There's a fair approach to how medical needs, domestic abuse and shared custody arrangements will be assessed.

Crucially, the feedback shaped the policy in areas where it lacked clarity, with the following amendments being made to the final draft:

1. The criterion for Medical Category A was reduced from 3 criterion to 2, offering a clearer distinction between Category A and Category B.
2. Clear wording was inserted to reflect that applicants could receive only 'Insecurity of Tenure' OR 'Threatened with Homelessness' points.

The draft policy, and consultation report is presented to GWA's Management Committee for final decision making before implementation of the policy from 1st May 2019.