

## **Amendments to access and eligibility criteria for public sector housing - summary and analysis of consultation responses April 2018**

### **1. Introduction**

The consultation on the Amendments to Access and Eligibility Criteria for Public Sector General Needs Housing ran for eight weeks from 21<sup>st</sup> December 2017 to February 18<sup>th</sup> 2018.

The Department of Infrastructure sought views on the proposed changes to the criteria which aim to:

- Modernise and clarify eligibility, residential and financial requirements for people applying to go onto a public sector housing waiting list, and
- Ensure applicants in greatest housing need have most priority when being allocated a home

Views were sought from everyone but in particular, relevant stakeholders including public sector tenants, private rental sector tenants, homeowners, local housing authorities and charity/third sector organisations.

### **2. Responses**

The consultation attracted 186 responses in total, with 180 respondents completing the survey online, two surveys completed by hand and four individual responses received by post or email.

Of the 182 surveys completed, 26 gave permission for their responses to be published in full, 121 gave permission for their responses to be published anonymously and 35 did not wish their responses to be published.

Eleven responses were received from organisations:

- Children and Family Services
- Onchan District Commissioners
- Douglas Borough Council
- IOM Enterprises

- Graih
- Braddan Parish Commissioners
- Port Erin Commissioners
- Michael Commissioners
- Port St Mary Commissioners
- Peel Town Commissioners
- Ramsey Town Commissioners

The survey was in two parts:

- Part A sought feedback on the proposed amendments to eligibility criteria for people wishing to be accepted onto a waiting list
- Part B sought feedback on the proposed amendments to the criteria for allocation of properties (the pointing system) for general needs public sector housing

A combination of 'Yes/No' questions and optional free-text responses were used throughout the survey.

A number of responses received were not directly related to this consultation exercise, however have been noted by the Department.

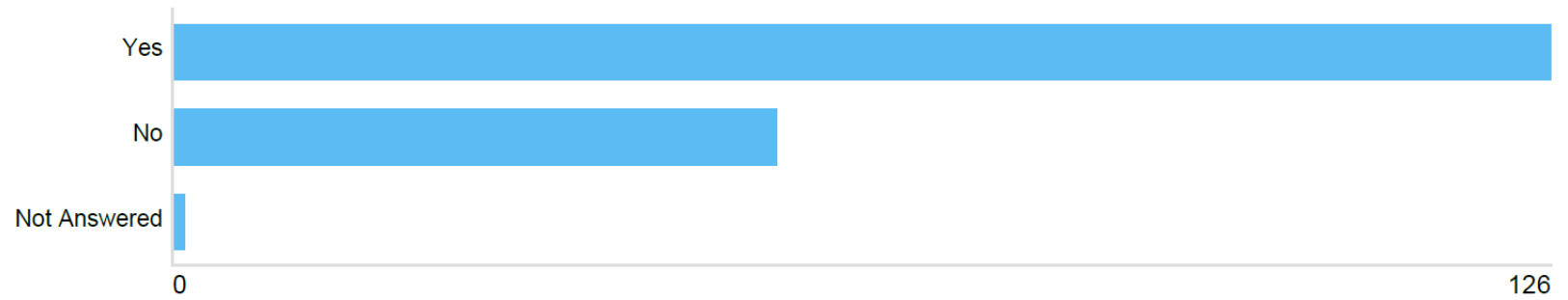
### **3. Summary and analysis of responses**

#### **Part A – Proposed amendments to eligibility criteria**

The survey opened with an explanation that the existing definitions of Eligible Applicant are simply being clarified and updated. There was no specific question in respect of Eligible Applicants however respondents were invited to make comments on the subject if they wished and a total of 19 comments were received, some of which are noted below:

- "The proposal is an improvement"
- "This seems fair in light of how couples are defined these days."
- "Much simpler to understand for all concerned."

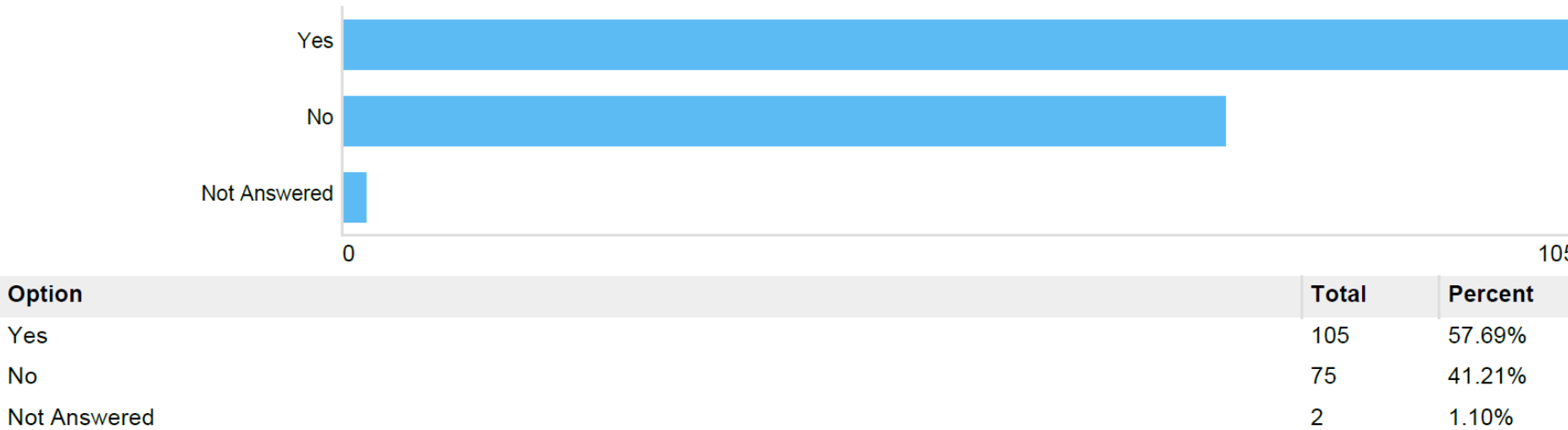
**Question 1: Should there be a local residency requirement for joining a particular Housing Waiting List?**



Option	Total	Percent
Yes	126	69.23%
No	55	30.22%
Not Answered	1	0.55%

The majority of respondents supported the continuation of a local residency requirement for joining a housing waiting list.

**Question 2: Do you support the reduction of the local residency requirement for joining a Housing Waiting List from 5 years to 3 years?**



The majority of respondents supported the reduction in time of the local residency requirement for joining a housing waiting list. Respondents who provided additional feedback to questions 1 and 2 commented as follows:

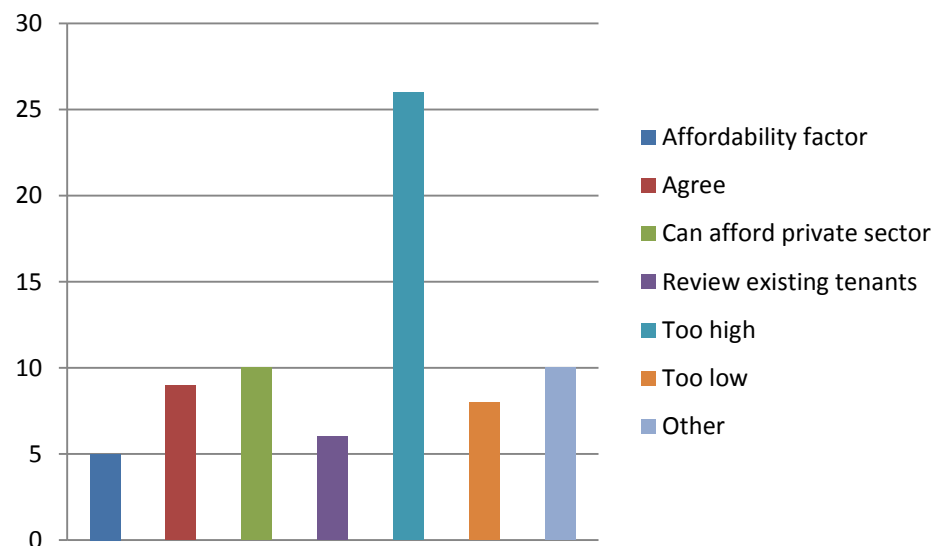
25% suggested there should be no local residency requirement and 25% felt that applicants should have the option of an island-wide choice. 19% felt that the local residency requirement should remain at 5 years whilst 11% supported the reduction from 5 years to 3 years.

### Question 3: Add any comments on the revised maximum income limits for access to public sector housing.

There were 74 comments made in response to revised maximum income limits.

In summary, current income thresholds are £33,555 - £41,990 for a single person or couple with 0 – 3 or more children.

The revised limits would range from £30,000 - £41,000 for a single person with 0 – 3 or more children and £33,000 - £44,000 for a couple with 0 – 3 or more children.



Of the 74 responses received, a total of 36 respondents (49%) felt that the revised maximum income limits were still too high, or that it was possible to rent in the private sector or afford to buy a property on the maximum thresholds.

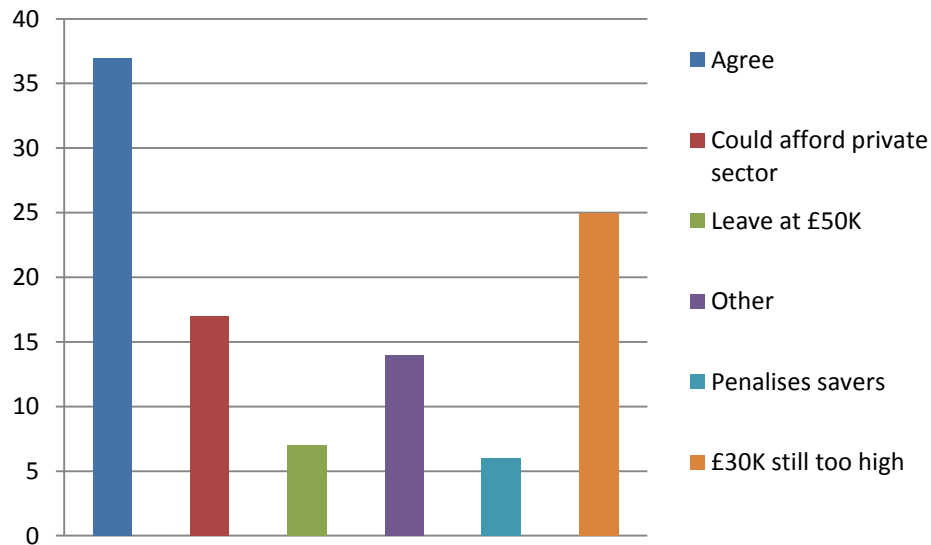
- "The maximum income seems very generous. Are individuals earning £30,000 considered to be 'vulnerable'? I'd be inclined to reduce this amount by at least 10 – 15% for all categories of applicants."
- "Think the maximum income limits are still too high. Social housing should be for those genuinely in need and on lower incomes. £30,000 is a good income and mortgages/rent are affordable on this level of income."
- "I am a single person and earn less than the required £30,000. I am able to provide rent, food and lighting for myself in the private sector...currently on £30,000 p.a. take home pay would be around £2,000 per month. If a person is not able to pay private sector rent from this then they are spending on additional things without care."

Around 11% of respondents felt that the revised income levels were not generous enough and that other factors should be taken into consideration.

- “As incomes are rising but still not keeping pace with inflation/the cost of living it would be wrong to reduce the income levels.”

#### **Question 4: Please provide any comments on the reduction of allowable savings and assets from £50,000 to £30,000**

There were 106 responses to this question.



Of these, 35% agreed with the reduction of allowable savings and assets from £50,000 to £30,000.

- “I agree that this will better target those in most need”
- “Wholeheartedly support this. £50k is far too high.”
- “New proposals sound fair”

24% of respondents felt that allowable savings and assets should be even lower than £30,000.

- “£30,000 is an excessive amount. If you have £30,000 in savings you do not require subsidised public sector housing.”
- “£30,000 is still too high. 2/3 bedroom properties can be purchased for around £200,000 which would equate to a £20,000 deposit requirement. It is difficult to justify why anything in addition to that would be required...a figure of around £15,000 should be the limit.”
- “Anyone with £30K in savings should be able to afford private rent, should be lower.”

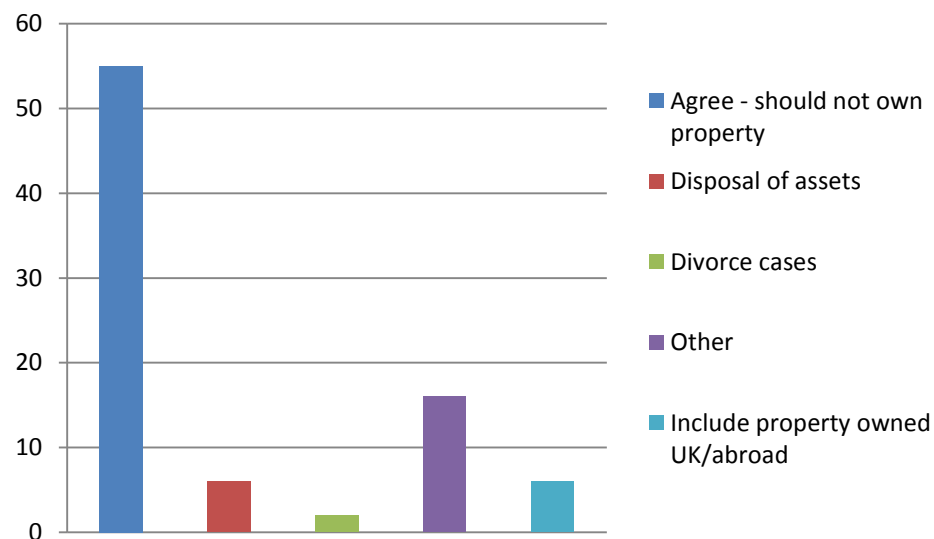
16% of respondents felt that having savings of £30,000 was sufficient to either rent longer term in the private sector or was potentially enough to purchase a property.

Other comments included

- reducing the allowance would penalise savers
- it should depend on individual circumstances, for example, older applicants on lower incomes may have accrued more savings than younger applicants but are less likely to be eligible for a mortgage
- an applicant may be on a low income but have savings above the threshold making them ineligible to go on the housing waiting list
- why is the limit not in line with the Social Security limit of £13,000?
- need to be able to properly validate assets and savings

### Question 5: Please provide any comments on property ownership and access to public sector housing

There were 103 responses to this question.



54% of respondents agreed with the requirement that applicants should not own property. Other comments received include:

- Should include property in the UK and abroad
- Depends on circumstances
- Local authorities should have discretionary powers
- Concern about disposal of assets, perhaps have a minimum period of time after selling a property before eligible to apply for housing



## Part B – Proposed amendments to the criteria for allocation of properties (the pointing system)

**Question 6: Should points for time on list should be capped at 20 (equivalent to 5 years) in line with the existing sheltered criteria?**



Option	Total	Percent
Yes	144	79.12%
No	31	17.03%
Not Answered	7	3.85%

The majority of respondents agreed that points for time on list should be capped at 20 (equivalent to 5 years).

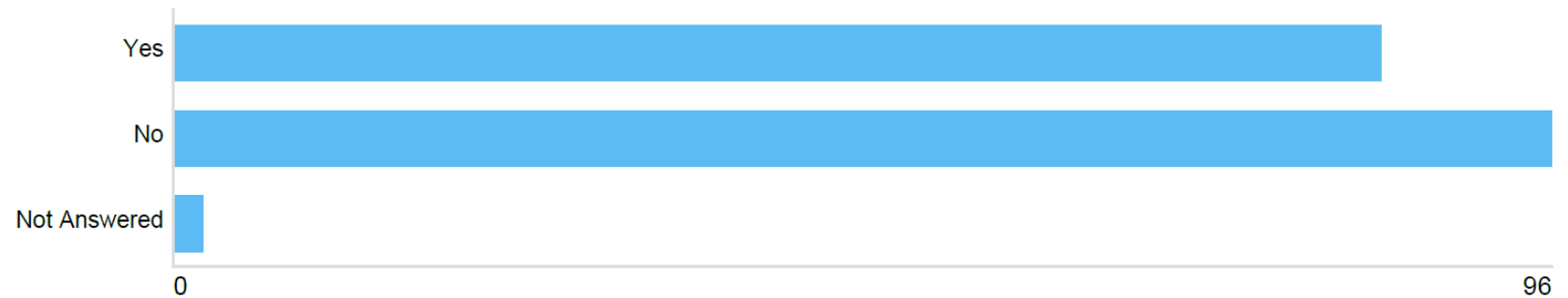
There were a further 42 additional comments to Question 6.

Of the 144 respondents who answered 'Yes' to the first part of Question 6, 19 made additional comments. A number of those in agreement with capping points at 20 (5 years on the list) suggested that anyone who refused a property should lose points, be sent to the back of the list or removed from the list completely.

Of the 31 respondents who answered 'No' to the first part of Question 6, 20 made additional comments. A number of respondents felt that not capping the number of points (i.e. leaving things as they are) would highlight excessive time on the list, although as mentioned in the consultation, applicants who have been on the list for 5 years or more are very likely to have been offered housing at least once.

Three respondents did not answer the first part of Question 6 but did provide comments which reflected the responses given above apart from one respondent who replied 'do not know'.

**Question 7: Do you think that extra points should be awarded to people who were born on the Island?**



Option	Total	Percent
Yes	84	46.15%
No	96	52.75%
Not Answered	2	1.10%

There were a further 71 additional comments to Question 7.

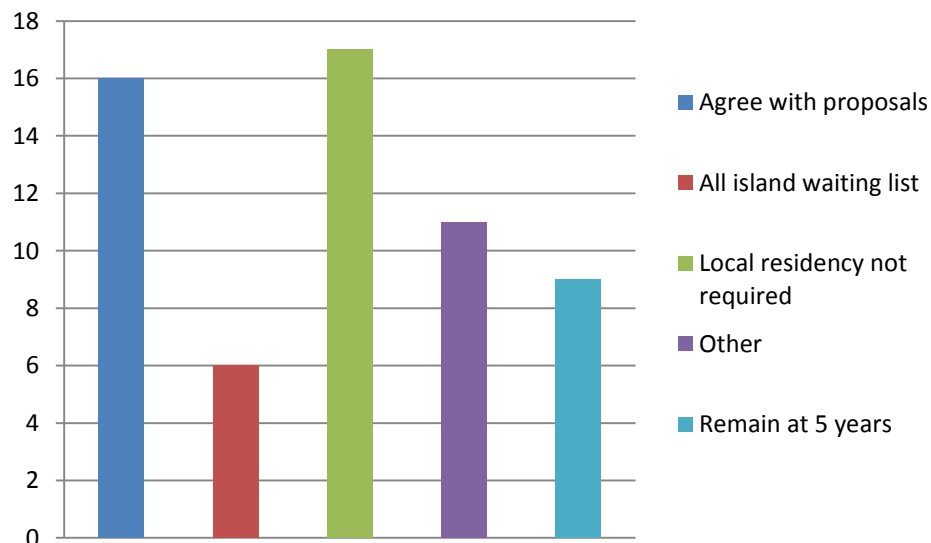
Of the 84 respondents who answered 'Yes' to the first part of the Question 7, 38 made additional comments. The perspective in this grouping was that priority should be given to Manx born people (22 respondents). The next most popular theme was that if extra points are awarded to island born people, they should have an uninterrupted period of residency (10 respondents).

Of the 96 respondents who answered 'No' to the first part of Question 7, 32 made additional comments. The main themes from this group were that contribution to society was a more important factor (11 respondents), being Manx born did not imply need (10 respondents) and place of birth is no longer a valid reason (9 respondents).

One respondent did not answer the first part of Question 7 but did comment that 10 years residency seemed fair.

### Question 8: Please add any comments on the pointing arrangements for residency

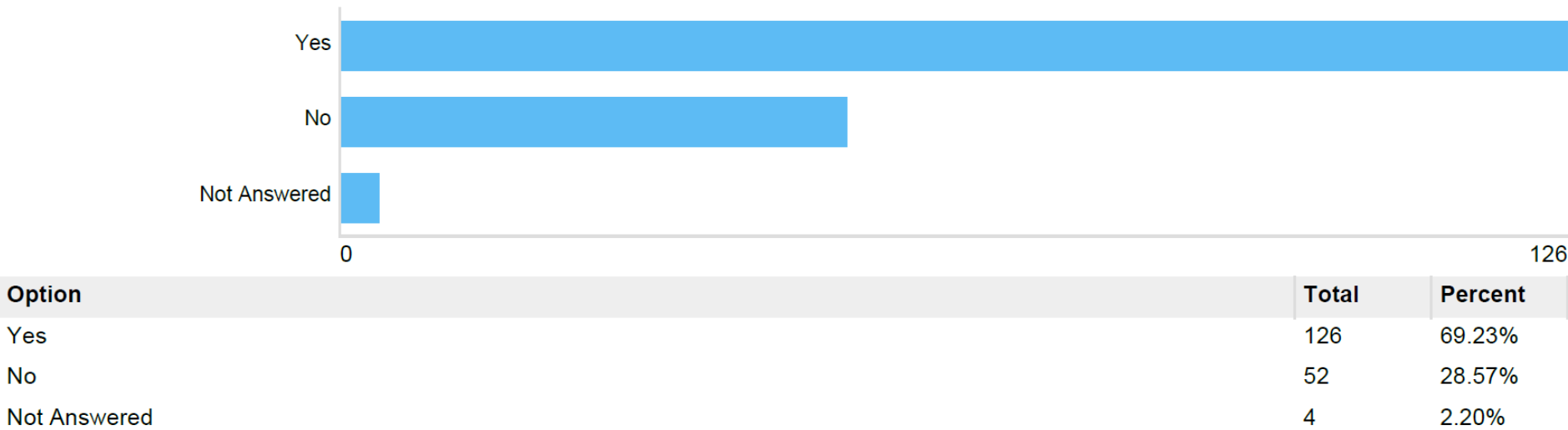
There were 59 responses regarding the pointing arrangements for residency.



Comments were sought on the awarding of 1 point for each year of residence in a local area, whether consecutive or not, to a maximum of 10 points.

The most common response was that local residency should no longer be a requirement and the second most popular, that the proposals were agreeable.

**Question 9: Is it appropriate that families with younger children are given priority over families with older and adult children?**



Nearly 70% agreed with the proposal.

There were 55 additional responses to Question 9.

Of the 126 respondents who answered 'Yes' to the first part of Question 9, 29 made additional comments.

"All children should be treated the same regardless of age."

"Children of any age need a home."

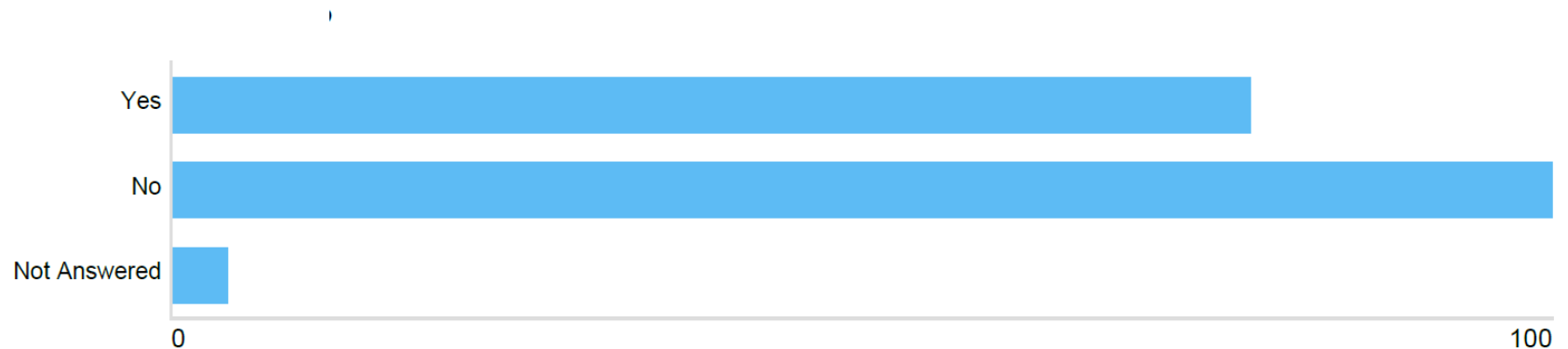
Of the 52 respondents who answered 'No' to the first part of Question 9, 24 made additional comments. This group provided a range of views such as the age of the child not being relevant and that older children also have their own needs as well as suggesting that prioritising families with children was unfair on single people or couples who do not have any children.

"Circumstances within different families can sometimes mean that families with older children are actually in need for greater space."

"I don't believe that people with children should be given priority whatever age. The system is inherently unfair against single people and couples without children."

Of the 4 people who did not answer Question 9, 2 provided comments on the proposed criteria.

**Question 10: Should points be awarded for every child in full time residence in the household rather than capping those points at a maximum of 3 children as is currently the case?**



Option	Total	Percent
Yes	78	42.86%
No	100	54.95%
Not Answered	4	2.20%

Slightly more respondents (55%) felt that additional points should not be awarded.

There were 54 additional responses to Question 10.

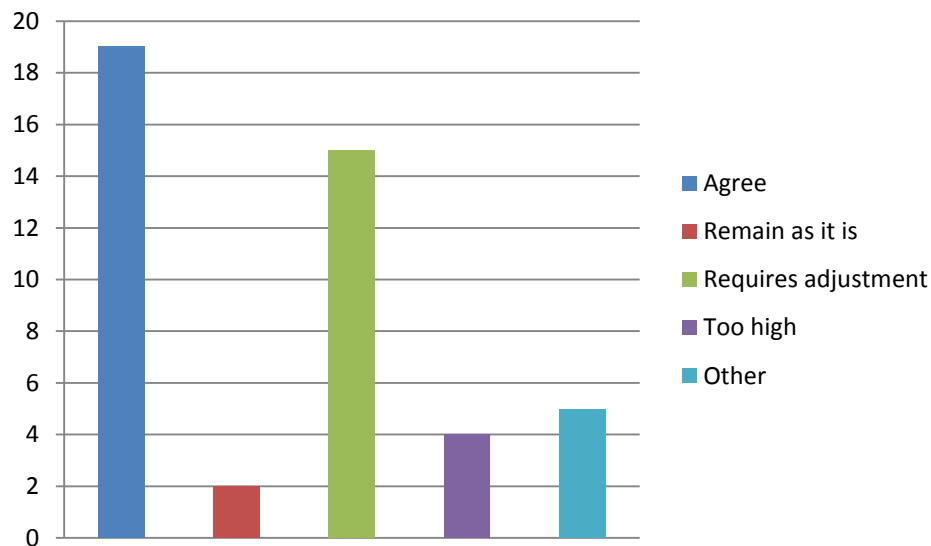
Of the 78 respondents who answered 'Yes' to the first part of Question 10, 17 made additional comments. Some respondents felt that points should be awarded for each child in full time residence as larger families shouldn't be penalised and family size is a matter of choice. Other comments included, the children should be in full time education (not working) and one of the local authorities stated it is down to their discretion to house larger families in suitable accommodation.

Of the 100 respondents who answered 'No' to the first part of Question 10, 34 made additional comments. The most common theme was that large families shouldn't be encouraged. Other common themes were that having more children could be viewed as a means to gaining access to housing more quickly, whilst others argued that the current criteria (capping at a maximum of 3 children) was adequate and should remain in place.

Three respondents whilst not directly answering Question 10 did provide feedback. The comments related to the age of the child, wage-earning children and shared custody arrangements.

### **Question 11: Please add any comments regarding revised gross income levels.**

There were 45 responses to this question.



A number of respondents agreed with the revised gross income levels whilst others added that priority should be given to applicants on lower incomes. The remaining comments were wide ranging, including 'overly complex', 'should remain as they are' and 'deduct points as savings increase'.

**Question 12: Should applicants who have £15,000 or more available to them in financial/property assets should be given lower priority on the Housing Waiting List than applicants in similar circumstances who do not have these funds?**



Option	Total	Percent
Yes	145	79.67%
No	30	16.48%
Not Answered	7	3.85%

A strong proportion (80%) agreed with the question.

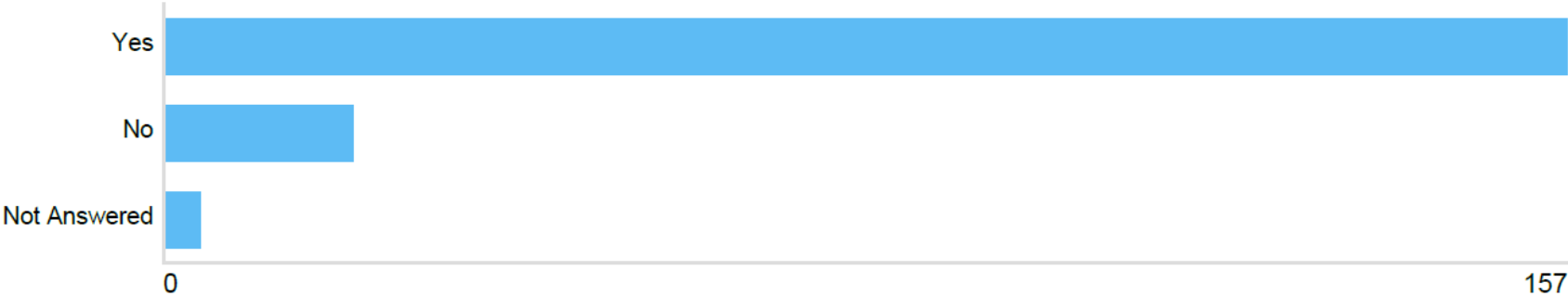
There were 54 additional responses to Question 12.

Of the 145 respondents who answered 'Yes' to the first part of Question 12, 34 made additional comments. 9 respondents commented that savings of this amount should be used towards housing costs, 5 respondents suggested that £15,000 was enough for a deposit to buy a home and 4 respondents said it depended upon individual circumstances.

Of the 30 respondents who answered 'No' to the first part of Question 12, 16 made additional comments. A number of respondents also felt that it depended on individual circumstances, others felt this criteria penalised people trying to save and could even discourage people from saving.

Four respondents did not answer the first part of Question 12 but did provide a comment. These comments reflected those made by respondents who answered 'No' to the first part of the question – depends on circumstances, penalises savers and could discourage saving.

**Question 13: Is it appropriate to increase the award of points to make health and welfare housing need high priority?**



Option	Total	Percent
Yes	157	86.26%
No	21	11.54%
Not Answered	4	2.20%

There were 41 additional responses to Question 13.

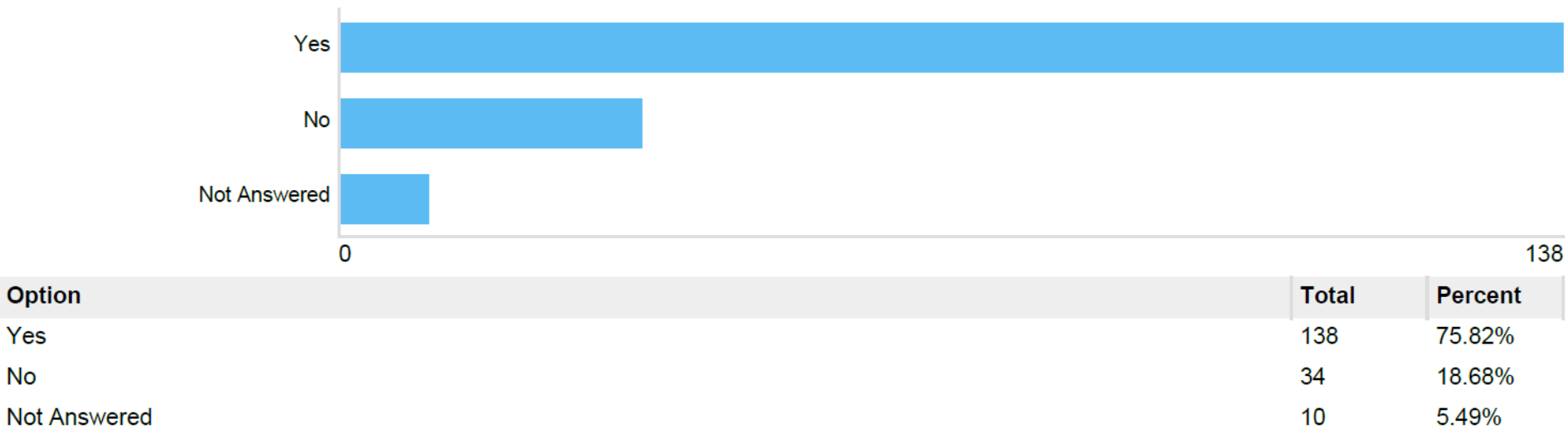
Of the 157 respondents who answered 'Yes' to the first part of the question, 28 made additional comments. A number of respondents felt that it was important to look after the vulnerable people in our society. Others comments were made about how poor housing can have a negative effect on health and that regulation of the private sector could remedy this.

Of the 21 respondents who answered 'No' to the first part of the question, 11 made additional comments. A number of respondents also commented on the effects of poor housing on health and regulation of the private sector. Other comments included that perhaps health and welfare should be two separate categories, that measuring health and welfare needs was difficult to measure and depended on individual needs.

Two respondents did not answer the first part of the question but did make a comment, one saying they did not know and the other suggesting that perhaps better regulation of the private sector may lead to better living conditions in some properties.



**Question 14: Are the amendments to the Notice to Quit points appropriate?**



There were 50 additional comments to Question 14.

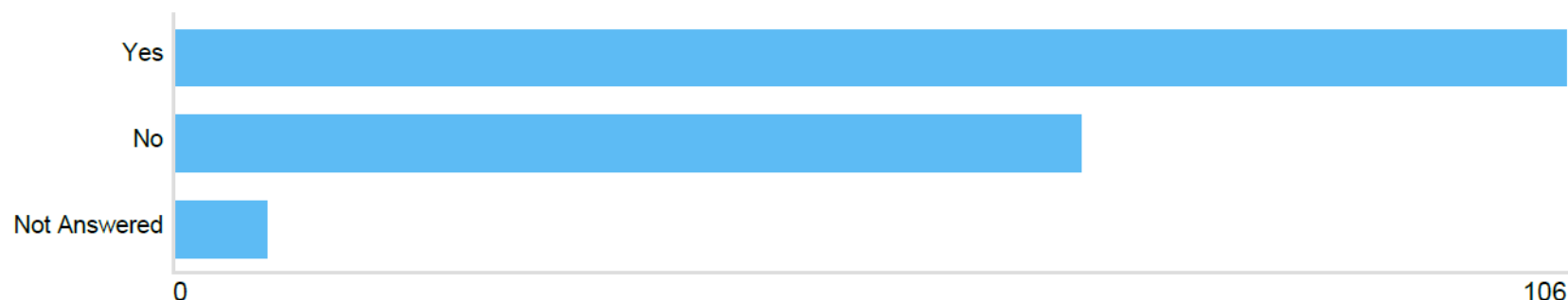
Of the 138 respondents who answered 'Yes' to the first part of the question, 25 made additional comments. 11 respondents felt that the reason for the notice to quit was important, for example, was it for breach of rent arrears or anti-social behaviour? Other comments include that the proposed criteria would encourage adherence to the legal system and prevent manipulation of the system. Another suggestion made was that there were plenty of private sector homes available so the current criteria could give a false impression of real housing need.

Of the 34 respondents who answered 'No' to the first part of the question, 20 made additional comments. Again, as mentioned previously, a number of respondents felt that the reason for the Notice to Quit was important.

Five respondents did not answer the first part of the question but did make a comment. These were generally similar in nature, agreeing that the reason for the Notice to Quit was an important factor.

**Question 15: Is it appropriate to give additional priority to applicants who have been renting in the private rented sector for at least a year?**

**Q14 - private sector tenancy - radio yes/no**



Option	Total	Percent
Yes	106	58.24%
No	69	37.91%
Not Answered	7	3.85%

There were 54 additional comments to Question 15.

Of the 106 respondents who answered 'Yes' to Question 15, 28 made additional comments. A number of respondents noted that this criteria acknowledges housing stress experienced by some private sector tenants, especially those on lower incomes. Others commented that it should depend on individual circumstances.

Of the 69 respondents who answered 'No' to Question 15, 22 made additional comments. A number of respondents also commented that this should depend on individual circumstances. Some noted that it was most likely that an applicant would already be living in the private rental sector so would it be feasible to offer extra points to all private sector tenants applying to go on the waiting list? Other feedback includes '1 year is too low', 'homeless/couch surfers not prioritised' and 'low income families are already given extra points'.

Four respondents did not answer the first part of the question but did make a comment. The comments reflected the feeling that giving priority to private sector tenants should depend on individual circumstances.

## **Final Thoughts**

109 respondents provided their final thoughts, comments or recommendations about the proposed amendments.

The five most common themes are as follows:

- Review of existing tenants is essential (58)
- Public sector housing is not for life (26)
- People should be encouraged to move out of social housing or downsize to smaller properties (23)
- Bring in means testing (22)
- Rent should be income-based rent (19)

There were many other thoughts and considerations made about the proposed amendments including:

- Ageing population/older applicants
- Build more affordable homes
- Young people leaving the care system
- More mid-rent options should be available
- Limit on number of refusals before being removed from the list
- Consider all outgoings as well as savings
- Should be for those most in need

## **Conclusion**

The Department thanks all respondents for taking the time to complete the survey. All responses, grouped by question and individual, will be considered as the Department develops its recommendations for Tynwald.

## **Next Steps**

The Department having considered all interested party feedback and consultation responses will progress the revised criteria for Access and Eligibility for General Needs housing in the Public Sector to Tynwald.