



5 July 2013

Response to Housing Allocation Scheme and Draft Tenancy Policy

KCSC and members of the Kensington and Chelsea Advice Forum welcome the opportunity to respond to the public consultation on RBKC's Housing Allocation Scheme and Tenancy Policy.

We believe that it is the decline new social housing in the borough that is a contributing factor to the number of people on the housing waiting list. It is understandable that in a sought after area like Kensington and Chelsea where people want to live and do not want to leave that being able to offer vacant properties is not that simple. However, Within RBKC's ten year Core Strategy the council committed to building 3500 social housing units, exactly 350 per year. That figure has never been reached.

Removing over 6000 people from the waiting list is an obvious step when it is not likely that they will ever be offered a property in the borough. However some of these could be resolved with the building of more social housing.

There are concerns that changing the criteria for registration could possibly deny people who have local connections in the borough the right of a chance to be housed. Open housing registration provides the opportunity to capture the needs of people waiting for housing and this contributes to general and specific housing statistics and evidence of need. Without this how would local authorities across the country know and be able to keep a track of housing need. Surely some of this vital knowledge will get lost through a closed register.

We would argue therefore, that it is important to maintain an open register but along with that, once people register they should be told the possible likelihood of not being housed in the borough, and then be provided with support and given choices to look elsewhere.

We would also like to note concerns over the priority being given to people in employment or 'actively seeking work'. At KCSC's housing seminar on June 10th 2013, the point was raised that hours of employment are becoming more and more complex with people now working to zero hour contracts. People actively seeking work is also a definition that needs to be considered further as the needs of vulnerable adults, disabled people and carers need to be taken into account to understand the impact on their housing application.

We would like to see some further consideration given to this and further discussion with organisations that work closely with workless people, adults at risk people at work to understand this issue further before a decision is made on how points are allocated

KCSC previously submitted a response to the Draft Tenancy policy in which we expressed concerns of some of the proposals made. In addition to what has already been said we would like to add concerns over people of pensionable age.

We understand that people of pensionable age will be affected by fixed term tenancies except those with certain health and wellbeing conditions. We strongly believe that people particularly aged 70 and over should not be offered a fixed term tenancy. This is likely to make a person feel unsettled and could contribute to causing additional worries and concerns at an age when a person should feel secure in their home.

We know that in light of the bedroom tax currently residents over the age of 55 are being sent letters offering housing solutions for residents that may want to move to areas such as Kent, Essex, Devon west Sussex and east Sussex as well as areas closer to London. Whilst this may benefit those who may wish to move to those areas it would not be beneficial for many who would not seek to move to areas where they lose family connections or connections with the area generally. The same would apply with the fixed tenancy agreement that older people should not be made to move out of their homes unless they wish to do so.

We would also want to see a robust method of how a judgment would be made on a person's health and wellbeing before making the decision on whether to offer a further fixed tenancy.

We understand that some ex members of the armed forces may require social housing prioritisation due to the mobile nature of their work which can provide difficulty in proving local connection. However we have concerns that there are also other members of society that could find themselves in the same position where it is difficult to prove local connection. This person could be homeless or needing to move to a new area because of domestic violence. We believe this should also be taken into consideration the same as ex-army personnel when making a decision on points to be awarded. These vulnerable groups will also face additional barriers when it comes to being employed or seeking employment and so the needs of these groups need to be considered in its entirety.

Finally we would like to see an equality impact assessment being carried out as we have major concerns that these changes will disproportionately impact on the black and minority ethnic community.

KCSC is happy to organise any further discussion between the council and local voluntary organisations and residents on issues raised in our response.

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