

Consultation Responses

Organisation	Consultation Comment	Consultation Comment Response
A2 Dominion	<p>I do have some concerns and questions about the change in policy relating to move-on from supported accommodation and would like to understand better how this would apply to our clients moving on from refuge. I'm primarily concerned that as one of our co-commissioners Cherwell will be requiring us to move refuge clients on within a strict 6 month time-frame, but that through this new policy will be making it increasingly hard for us to do so. I would welcome a more detailed conversation around this.</p>	<p>Considered but decided to keep this proposed change. This banding change is to give parity with homeless applicants. As this is a banding change, the impact of this will be kept under review and if required further action will be taken.</p> <p>The Assistant Director Housing met with 2 lead staff at the refuge in October 2018 and agreed that we will be working together to a) facilitate access to the housing register for victims that need to settle in Cherwell and b) ensure that victims and families are moved on within 6 months unless there are exceptional reasons why this cannot be achieved.</p>
Bromford	<p>I have read through the new draft scheme and by and large support the proposed changes and the overall scheme. We particularly welcome the statements in the <u>Introduction</u> at 1.1 stating that RPs will assess applicants according to their own stated priorities which is then further strengthened in s 8.9, headed <u>Nominations</u>. We do not feel, however, that the current Nominations Agreement with Cherwell reflects the Allocation Scheme well and fetters RPs beyond that which the Allocation Scheme sets out. I would propose a review of the Nomination Agreement to better reflect the scheme particularly around the application of the RP's own policy, refusals and rejections. In addition with regards to the Nominations Agreement we would welcome further discussion around repeat nominations and choice based lettings (CBL) cycles as we are of the view that continuing to request nominations for a total of three CBL cycles is not reasonable for either relets or new builds.</p>	<p>Nominations agreement to be revised, taking into account views of all RP partners and ensuring it truly reflects the Housing Allocation Scheme.</p> <p>These points will be considered as part of the review of the Nominations Agreement.</p>

Build!, Cherwell District Council	I can't see any further changes, I think this will clarify a lot of things for us.	Comments noted. No action required
BYHP	I have read the document and my main observation is more of a logistical one. The document is based on the premise that the applicants have access to the internet which is especially relevant to Choice Based Lettings. What happens if the applicant cannot access the Internet and wants to bid but either does not have the confidence or facilities to declare an interest? Should the Council not consider providing access via computer points in all Cherwell District Council Offices and Info Points, listing the properties available that particular week. I was involved in a similar scheme in Wellingborough a couple of years ago, which was very successful, with access points all around the area in local Homeless centres, post offices etc, providing easy access.	Applicants can use IT facilities at the following council offices: Bodicote House, Banbury, Kidlington and Bicester. Access to the internet will be looked at within the on-line housing register application project and further access points will be considered.
Children Education and Families, Oxfordshire County Council	We are in discussions with the Team Leader on how to resolve the current catch 22 situation of a potential foster carer having to have adequate housing before they can be allocated a large enough house by yourselves and needing a large enough house before they can be approved by us. We would like this conundrum to be noted as part of the consultation in order to aid an early resolution, and we appreciate your willingness to work with us on the issue.	To have discussions and agree joint working procedure.
Citizens Advice	1 – 1.1 paragraph 3 is written 'In the Demand' should this be 'if the demand' ? 2. Page 63 1.1 Rent Arrears the way I read the first sentence to me made it sound like disqualification from the Housing Register would be in place until accrued rent arrears reached 8 weeks. It's clarified later in the paragraph that rent arrears need to be under 8 weeks but perhaps the first sentence either needs removing or re wording to make this clearer?	Noted. Wording to be updated to make it clearer.

Connection Support	<p>My main response is in relation to move on from supported housing moving down to band 2. The new policy states that applicants need to be ready to move at the time we put in the application and most of the time CDC have insisted that they are at least six months in the project (although this is not written in the policy): if they are place on band 2, the reality is that they will waiting usually at least nine months and the project will silt up, they will become discouraged, possibly become disruptive , seeing no visible incentive to keep abiding by the rules of the project (this is a group who find it very hard to plan for the future anyway). There is also the rule that after three months they will be placed on automatic bidding, so may be placed in one of the least desirable properties, which are usually with neighbours they wish to avoid. We try to support them to find private rented but the reality is that in this area, private landlords will say no to anyone on benefits and even if we have clients who are working, it is proving difficult to impossible to find affordable private rented for single individuals on minimum wage (and often zero hours) contracts. There is one other issue that there have been some rough sleepers who have engaged at the drop ins and have successfully got on to the housing register, have medical needs (which many rough sleepers have) and are then able to start bidding immediately on band 2 – they may still be out, but they don't have to wait six months, keep to any project rules or be pressurised to change their lifestyle and they have more choices on which properties they can bid for. None of this helps us to encourage individuals to stop sleeping on the streets and come into the Pathway.</p>	<p>Considered but decided to keep this proposed change. This banding change is to give parity with homeless applicants. As this is a banding change, the impact of this will be kept under review and if required further action will be taken.</p>
Oxford University Hospitals NHS Foundation Trust	<p>page 45 - Discharge from a Psychiatric Hospital; Patients are usually discharged after a multiagency meeting called Care Programme Approach (CPA). The patients' allocated social worker should liaise with Housing in ample time or invite Housing to the CPA to discuss options. This is to avoid</p>	<p>Noted and agreed that we will work closely and at an early stage with the patient and their allocated social worker.</p>

	discharging on the streets or readmissions. Page 46 - Hospital discharges; for those who have complex health needs and may have mobility problems - The Hospital Social Care Team or Discharge Team should liaise with Housing.	
Oxfordshire Clinical Commissioning Group	Supports the revised scheme.	Comments noted. No action required.
Oxfordshire County Council	<p><u>Move on from supported accommodation</u>: We do not support this proposed policy change. We appreciate that CDC need to manage limited supply, but believe that this amended policy would disproportionately affect the most vulnerable groups such as homeless people, young people and care leavers. This will also block Cherwell's limited local supported accommodation for adults and young people, which is already under significant pressure. It is our understanding that the original decision to place this group into band 1 was to recognise the fact that people have made progress in their lives and are tenancy ready. Removing band 1 status will be in our view counter-productive. We suggest that alternative mitigation measures should be pursued such as increase in supply of 1 bed-flats, and development of other affordable housing options, such as shared housing and housing linked to employment and training.</p> <p><u>Sheltered housing</u>: We welcome the introduction of this category, as it would improve visibility of the shared housing offer, and might improve system wide intelligence about the need and accessibility. On the subject of a 2 channel approach to nominations for this provision, we recognise that these arrangements could work better for everyone leading to better outcomes for people and a more efficient nomination process, for example reducing voids related costs. We would welcome a joint review of current arrangements.</p>	<p>Considered and agreed to keep this proposed change. This banding change is to give parity with homeless applicants. As this is a banding change, the impact of this will be kept under review and if required further action will be taken.</p> <p>It has been agreed to remove this proposed change as it could create confusion for applicants. There is also duplication in the process of allocating extra care accommodation and a separate group would exacerbate this. A process review will be undertaken with relevant parties.</p>

	<p><u>Foster carers</u>: Jackie Goodwin, Housing Development Officer (Children Education and Families) have separately submitted a request to clarify CDC's approach to recognising the housing need of a kinship carer who is not yet approved as a foster carer but has the expressed intention to look after children and this is endorsed by Children Social Care. Discussions with colleagues at Cherwell are taking place this week with a view to clarify this point and agree a way forward.</p> <p><u>Auto bidding</u>: We welcome the retention of this provision as it recognises that not everyone has access to an advocate who could bid on their behalf.</p>	<p>To have discussions and agree joint working procedure.</p> <p>Noted.</p>
Salvation Army	<p>In recent months there have been a number of rough sleepers in Bicester who cannot access hostel accommodation due to lack of capacity in Oxford. This seems to have got worse in the last six months or so. Our understanding is that it is difficult to find move-on accommodation so the hostels get jammed up. We've had people waiting for several weeks, sometimes months to get in. Hostel beds and other supported housing are obviously a tremendously expensive and valuable commodity. The suggested change would increase the likelihood of people being ready to move on, but not being able to do so due to their band 2 status - in effect bed blocking much like in the NHS. This would be a waste of resources at a time when number hostel beds are already being much reduced. In turn, then, this would leave our local rough sleepers with no available hostel accommodation and we predict the numbers of rough sleepers would rise. I do hope this particular part of the proposal can be reconsidered,</p>	<p>Considered but decided to keep this proposed change. This banding change is to give parity with homeless applicants. As this is a banding change, the impact of this will be kept under review and if required further action will be taken.</p>
Sanctuary Housing	<p>As they stand the changes look ok, very good news on change to bedroom standards bringing this in line with HB as this did cause some confusion.</p>	<p>Noted.</p>

	<p>Some other thoughts on allocations: As briefly alluded to during a meeting with CDC last week, I would ask the council to consider if homeless applicants can bid on properties rather than be nominated via autobidding. They would still only have one refusal. I appreciate that this could cause problems for organisations like ours as some of our Hard to Lets (HTL's) are filled from this group. However, as an example, 3 bedroom top floor maisonettes cause problems to families with small children even when they bid on them and it is even more problematical when homeless families accept HTL's on autobid. We tend to find these families stay less time, and generate complaints about property and ASB in an attempt to move.</p> <p>Could we also request more than one nomination at a time on properties. As you obviously know some applicants will bid 3 times on each cycle. Ours could well be the third bid but it is not in an area that the resident really wants (we can provide examples if this would help). There will be delays when we contact them , obtaining financial information etc only for them to refuse the property on a reason that should have been considered before they bid (too far from schools, support etc)</p> <p>Does the council enforce 3.6.3 ? Refusal of offers - applicants who are not restricted in their bidding but have refused 3 (three) suitable offers of accommodation. We are not aware that this applies in practice? If it is followed then it would be useful to know so we can advise residents when they view. Currently any resident looking to refuse is advised to discuss it with yourselves before making a decision.</p> <p>Keyworker preference. How do we ask for this when placing an advert? Can a request be made on any property or does this need to be part of a Local lettings plan? 8.10.3 (d) Is this available as a figure to individual RP's as we do not appear to</p>	<p>Noted and considered, however there will be no change to auto-bidding for homeless applicants at this time.</p> <p>This will be considered as part of the review of the Nominations Agreement.</p> <p>Noted. A refresh of the procedures will be undertaken to clarify this.</p> <p>Noted. A refresh of the procedures will be undertaken to clarify this.</p>
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	<p>receive one third of our nominations from applicants in employment education or training? Who determines when this group is targeted on adverts is it yourselves or can we do it?</p> <p>8.10.3 (d) Is this available as a figure to individual RP's as we do not appear to receive one third of our nominations from applicants in employment education or training? Who determines when this group is targeted on adverts is it yourselves or can we do it?</p>	<p>Noted. A refresh of the procedures will be undertaken to clarify this.</p>
Waterloo Housing	<p>We've had an opportunity to review the draft Housing Allocations Policy for Cherwell now, generally we are ok with the proposals however; We can't see any mention of Waterloo Housing being able to apply its own Policy when considering Nominations which is fine to a significant degree as they are very clear on ineligibility to and exclusion from the Register regarding Applicants current/past behaviour or conduct of tenancy but they are allowing Applicants on to the Register to actively Bid if they have rent arrears of less than 8 weeks of rent outstanding which differs to ours of 1 month. To clarify if applicants do not meet the criteria as set out within our Lettings Policy we will seek to reject them, this happens in very few cases and of course would be in close liaison with the Council, we also provide applicants with a right of appeal. Your thoughts on this would be useful?</p> <p>Other than that, just Appendix 1 - Waterloo Housing Group needs to be amended to Waterloo Housing and the telephone number amending to 0345 600 6055.</p>	<p>Noted. Wording in 1.1 and 8.9 is deemed to be sufficient</p> <p>Noted and updated</p>