

Temporary Suspension of the Housing Register

For Cabinet on 9th February 2023

Summary

Lead Member: Cllr Hugo Pound – Cabinet Member for Housing and Planning

Lead Director: Paul Taylor- Director of Change and Communities

Head of Service: Gary Stevenson – Head of Housing, Health and Environment

Report Author: Stuart Clifton – Housing Services Manager

Classification: Public document (non-exempt)

Wards Affected: All

Approval Timetable	Date
Housing Advisory Panel	13 th December 2022
Management Board	11 th January 2023
Communities & Economic Development CAB	25 th January 2023
Cabinet	9 th February 2023

Recommendations

Officer recommendations as supported by the Cabinet Member that:

1. Cabinet approves a temporary suspension of the housing register for a period of one month so that the new housing IT system can be implemented in Tunbridge Wells and across Kent.
2. Cabinet approves the recommendation that existing housing register applicants are required to re-apply to the housing register, to enable a reassessment of their application against the Council's new Allocation Scheme.
3. Authority is delegated to the Head of Housing, Health and Environment, to make future decisions, should the date for closure of the housing register need to be any later than 1st June 2023.

1. Introduction and Background

- 1.1 Kent Homechoice (KHC) is a partnership of 13 Local Authorities, 28 Housing Associations and Kent County Council (KCC) set up to provide a Kent wide choice-based lettings system and expanded to provide a housing options IT system. Dover District Council (DDC) are the lead authority.
- 1.2 The KHC Partnership was formed in 2006 to provide a choice-based lettings system for all of Kent, the partnership is made up of the 13 Kent & Medway Local Authorities, KCC and 28 Housing Associations that have stock in Kent. DDC have been the lead authority since 2015.
- 1.3 The day to day running of the partnership is managed by the KHC Partnership Manager whose post is hosted by DDC. Decisions regarding the management are taken by the KHC Project Board which is made up of senior officers at each Local Authority, KCC and the larger Housing Associations.
- 1.4 In July 2022 Cabinet at DDC approved the award of the contract for the Kent wide housing options system to Huume and this was also agreed by the Kent Homechoice Project Board of which we are a member. The new contract was signed and put in place with Huume on 17th September 2022. The contract with our current system provider Locata finishes at the end of July 2023. Work is progressing to have the new system in place ahead of this contract end date.
- 1.5 So that the housing register and housing options IT systems can be moved from the Locata system to the Huume system, ahead of July 2023, it is necessary to temporarily suspend the housing register for a period of one month.
- 1.6 Approval is sought to temporarily suspend the housing register to new applications from 1st June 2023 until 1st July 2023. This will provide officers across Kent and Medway with sufficient time to allocate and close outstanding shortlists or move them to the new system. It will also provide time to assess the status and banding of new applications and to cleanse any additional data should this be required before a copy of the data is provided to us by Locata.
- 1.7 Locata will provide a copy of all of the data held on their system on 16th June 2023 and Huume will upload the required data into their system as soon as possible after this date. This will then provide Huume and the Council's housing team with a further two-week period to correct any issues caused by the data upload so that the housing register can be reopened up on 1st July 2023
- 1.8 Property adverts can be prepared on the Huume system from 16th June ready to be advertised on 1st July. This means that there will only be a two-week period where properties cannot be advertised.
- 1.9 Existing housing register applicants will be required to complete a new application to join the housing register, whereby they will be assessed against the Council's new Allocation Scheme. Asking applicants to re-apply for the housing register is not only a much cleaner process than re-assessing existing applications which may be several years old, but also ensures that old data that is no longer required is not being

transferred to the new Huume system. Further information may be required from applicants to assess them against the new Allocation Scheme which is not currently held to more ensure that the applicant qualifies for the Housing Register and is banded correctly. In addition, there is a risk that some applicants would be disadvantaged if applicants were not required to reapply. This is because it would require all existing applicants to be fully re-assessed against the new Allocation Scheme at the same time, so that no applicant can be seen as having gained any advantage in terms of the order or prioritisation of applicants for this re-assessment. With applicants being required to re-apply to remain on the Housing Register, applicants will be assessed against the new Allocation Scheme in order of their reapplication being received.

- 1.10 To ensure that existing customers are not disadvantaged by being required to re-apply to the housing register, customers will be given a 3-month period to submit their new application where they will be able to retain their existing priority date. Existing applicants who re-apply outside of this 3-month period will not be able to retain their previous priority date, except for any applicants able to demonstrate extenuating circumstances which caused them to be unable to re-apply within the specified 3-month period.
- 1.11 Customers will be informed of the steps they are required to take to re-join the Housing Register through a variety of communication, including emails alerts to all existing customers, messaging on the Kent Homechoice website when customers access their account; and on the Tunbridge Wells Borough Council website. Front of house Amelia Scott customer services staff will also be informed to communicate to customers where contact is made.
- 1.12 The communication strategy will ensure that customers are notified of both the temporary suspension of the Housing Register and requirement to reapply to remain on the Housing Register. A campaign will be run on Kent Homechoice with applicants notified of this requirement when they visit the Kent Homechoice website and log into their account, which is where applicants would place bids on properties. Customers will also receive both an email and letter informing them that they must reapply to remain on the Housing Register, with reminder emails and letters being sent to those applicants who have not re-applied.
- 1.13 Additional assistance will be provided to vulnerable applicants. Applicants whose application was completed by a third party will also receive telephone contact to ask whether they wished to reapply for the Housing Register and if so, whether they have any person to support them. Where applicants have no support, additional support will be provided by officers to complete the application. At present, 73 applicants on the Housing Register had their application completed by another person. This represents 8% of the Housing Register. Of these 73 applicants, 35 had assistance from family members, 35 had assistance from a professional and 3 had assistance by a person listed as 'other'.
- 1.14 If the housing register was not suspended for the month-long period, the data that is extracted from Locata to Huume will not be fully up to date and accurate. There will be a time lag of a few days whilst data is uploaded to the Huume system which would then mean that the data of any new applicants applying during those few days would have to be manually transferred to the Huume system. It would also then prove to be

challenging for officers to check through and update the new system whilst new applications also arrived into the system.

2. Options Considered

- 2.1 **Option A** – To temporarily suspend the housing register for a period of one month and require existing applicants to reapply for the housing register. This will enable the officers within housing to have a short period of time where they close outstanding shortlists. It will also enable all applicants to be assessed against the new Allocation Scheme and so that clean and up to date data can be moved from Locata to Huume on 16th June 2023.

This will then allow officers a two-week period to ensure that the data has loaded into the new Huume system correctly before the housing register re-opens to new applicants.

- 2.2 **Options B** – To temporarily suspend the housing register as detailed above, but not require existing applicants to re-apply to housing register to be assessed against the new Allocation Scheme. This would mean transferring a large amount of outdated data to the new Huume system and will require assessments against the new Allocation Scheme using old application forms, which may be several years old.
- 2.3 **Option C** – Would be not to temporarily suspend the housing register but to upload the data without shortlists having been closed or applications having been assessed. If the housing register was not suspended for the month-long period, the data that is extracted from Locata and sent to Huume will not be fully up to date and accurate. Officer would also need to be working across two systems at the same time to check through and update the new Huume system whilst new applications also arrived into the existing Locata system.

3. Preferred Option and Reason

- 3.1 Option A is the recommended option as this will enable the data that is transferred to be in a condition that is easier to upload to a new system and will reduce the number of errors that occur as a part of the data upload. It will also be a much easier process to assess the new applications from existing applicants against the new Allocations Scheme using the new information provided by applicants, than assessing against older applications received which may be several years old and may no longer be accurate.

4. Consultation on Options

- 4.1 Consultation has taken place with the Cabinet Member for Housing and Planning, as well as consulting with the Housing Advisory Panel. Both the Cabinet Member for

Housing and Planning and the Housing Advisory Panel are in support of the recommended option to temporarily suspend the housing register for one month to enable the switch of housing systems from Locata to Huume.

Recommendation from Cabinet Advisory Board

- 4.2 The Communities and Economic Development Cabinet Advisory Board were consulted on Wednesday 25 January 2023 and the recommendations to Cabinet set out in the report were supported, but with some additional reassurances regarding the communication to and support for vulnerable customers to reapply to Housing Register.
- 4.3 The report has been updated to provide further detail regarding the communication strategy and support to customers, see section 1.10 – 1.
- 4.4 The Communities and Economic Development Cabinet Advisory Board also recommended that consideration was given to the length of time applicants had to re-apply for the Housing Register to retain their existing priority date and increase this from the proposed 3-month period detailed in section 1.12 – 1.13.

5. Implementation

- 5.1 Should the recommendation be approved by Cabinet to temporarily suspend the housing register for one month from 1st June 2023 to 1st July 2023, applicants will be notified of the temporary suspension of the housing register.
- 5.2 Existing housing register applicants will also be informed of the requirement to complete a new application for the housing register, whereby they will be re-assessed against the Council's new allocations scheme. Customers will be informed of the steps they are required to take to re-join the Housing Register through a variety of communication, including emails alerts to all existing customers, messaging on the Kent Homchoice website when customers access their account; and on the Tunbridge Wells Borough Council website. Front of house Amelia Scott customer services staff will also be informed to communicate to customers where contact is made.
- 5.3 To ensure that existing customers are not disadvantaged by being required to re-apply to the housing register, customers will be given a 3-month period to submit their new application where they will be able to retain their existing priority date. Existing applicants who re-apply outside of this 3-month period will not be able to retain their previous priority date, except for any applicants able to demonstrate extenuating circumstances which caused them to be unable to re-apply within the specified 3-month period.

6. Appendices and Background Documents

Background Papers:

- Record of decision from Dover District Council to award contract of the Kent Homechoice and Housing Options system to Huume - <https://moderngov.dover.gov.uk/ieIssueDetails.aspx?Id=23447&PlanId=0&Opt=3#A119907>
- Record of decision by Cabinet to approve the revision of the Allocation Scheme and copy of the draft Allocation Scheme approved for consultation <https://democracy.tunbridgewells.gov.uk/ieDecisionDetails.aspx?ID=2704>

7. Cross Cutting Issues

A. Legal (including the Human Rights Act)

The legal implications are detailed within the report and accepting the recommendations will enable the Council's to fulfil its duties more efficiently and effectively under the Part 6 of the Housing Act 1996 (as amended).

Claudette Valmond, Head of Legal Partnership – 19 December 2022

B. Finance and Other Resources

There are no additional financial resource implications in closing the housing register as the financing of the transition of the Housing Options system to Huume is within the existing Kent Homechoice budget as agreed by DDC cabinet.

Stuart Clifton, Housing Services Manager, 18 November 2022

C. Staffing

Requiring existing housing register applicants to reapply will require staffing resources, with there being over 900 applications currently on the housing register. It is expected that not all applicants will reapply, however there will remain a significant number of applications to assess. The recruitment of two Housing Triage and Allocations Officers and the Allocations Team Leader post, created by the recent restructure to the Housing Options Team, as well as additional support from the wider team, will mean there is sufficient staff resources available.

Stuart Clifton, Housing Services Manager, 18 November 2022

D. Risk Management

The risks associated with this proposal, including the risks if the Council does not act as recommended, have been considered in line with the Council's strategic risk register. We are

satisfied that the risks associated are within the Council's risk appetite and will be managed as per Policy.

Stuart Clifton, Housing Services Manager, 18 November 2022

E. Environment (inc. Biodiversity) and Sustainability

A Climate Emergency Impact Assessment has been undertaken which has not identified any negative impact on carbon emissions or the environment.

Stuart Clifton, Housing Services Manager, 18 November 2022

F. Community Safety

The recommendations will have a no impact on Crime and Disorder.

Stuart Clifton, Housing Services Manager, 18 November 2022

G. Equalities

An Equality Impact Assessment has been conducted on the new Housing Allocations scheme, as reported to Cabinet on 27 October 2022. Temporary suspension of the housing register may impact on people with some protected characteristics who may need additional support for, or adjustments to, the reapplication process. Support will be available to manually accept and input applications from vulnerable customers who need to apply to join the Housing Register during the period of temporary suspension and additional support will be made available to assist any existing applicants to reapply. We will also ensure that a range of communication methods are used to inform people of the reapplication process. We will carry out regular monitoring of the reapplication process to ensure that all affected individuals receive communications and are given the opportunity to reapply.

Sarah Lavallie, Corporate Governance Officer, 12 December 2022

H. Data Protection

A joint Data Protection Impact Assessment has been completed for Kent and Medway Councils. The Data Protection Impact Assessment will ensure that the transfer of the housing register to a new provider will be compliant with the data protection principles and that any risks are mitigated. With regards to the temporary suspension of the housing register, customers will be presented with the necessary privacy information as part of the reapplication process and we will work with the existing and new provider to ensure that secure data migration takes place.

Jan Clark, Head of Policy and Governance, 12 December 2022

I. Health and Safety

There are no health and safety implications.

Stuart Clifton, Housing Services Manager, 18 November 2022

J. Health and Wellbeing

There are no identified health and wellbeing implications

Stuart Clifton, Housing Services Manager, 18 November 2022