



Allocations Investigation

September 2021



Kingston Residents' Scrutiny Panel

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*These appendices are available upon request from Theresa Mayers, Business Assurance Officer, RBK Council



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INTRODUCTION

The Kingston Residents Scrutiny Panel, KRiSP is an autonomous Panel of council tenants and leaseholders set up by the Royal Borough of Kingston upon Thames Council in conjunction with the Kingston Federation of Residents. The role of KRiSP is to investigate and review the Council's housing services and to propose improvements that will be of benefit to all residents. KRiSP is central to the Council's 'Resident Involvement Framework' and has a commitment to co-regulation. It was formed in October 2013 and is currently composed of 10 tenants and leaseholders.

The role of KRiSP is to carry out service investigations and report on them to the Council. This is KRiSP's Twelfth investigation and the area of Allocations was chosen for the following reasons:

- It was a topic which could be done within current COVID restrictions
- Concerns about the impact of decanting from the Cambridge Road Estate regeneration
- This would be a follow on to the related, but separate, previous report into Voids

Following identification of Allocations there had been a meeting between the KRiSP Chair and Vice Chair with Wale Adetoro, Assistant Director of Place. This had discussed concerns about potential overlap between the proposed Review and an Internal Audit into Allocations due later in the year, and pressures upon staff during the summer. As a result it was agreed that the Review would support the Audit, cover areas unlikely to be included in the Audit and be largely completed by the end of August.

The KRiSP Investigation Panel was led by David West and comprised Raewyn Hammond, David Miller, Geof Yates, Monique Green, Jackie Paddon, David Brown, Gill Wilson, Mark Veitch and Sian Smith. This review was unusual in that it was impacted by COVID. The Panel has carried out its work virtually but this unplanned change has led to this report taking longer than planned.

The Panel was supported by Theresa Mayers from the Council along with mentoring support from Phil Morgan. The KRiSP Investigation Panel would like to thank all the members of staff, residents and others who gave up their time freely to support this investigation.





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EXECUTIVE SUMMARY

KRiSP wish to acknowledge that the Allocations Team have a very difficult role and even before the advent of Covid they were always playing “catch up” due to a historic shortage of available homes within the Borough and an ongoing increase to the waiting list. Covid has made their role harder with further restrictions on void turnaround plus the impact of Central Government’s policy to locate homes for the homeless. The Cambridge Road Estate regeneration scheme, whilst it will improve provision of homes, will lead initially to 80% of available homes being used for decanting during the initial phases/ KRISP welcomes the role and dedication of the Team in dealing with these pressures and the demands placed upon them.

Whilst understanding these pressures KRISP believes that more attention could be paid to the resident experience within allocations. Our survey showed there were issues with responses, support with the process, communication, rights of appeal and timescales. Understanding that experience through setting, monitoring and reporting against Key Performance Indicators (KPIs) would help the Allocations Teams improve the process for applicants. This should also cover applicants without Internet access, disabled applicants plus ensuring all are aware of the Complaints process.

Staff ideas around communication during the Cambridge Road Estate regeneration scheme will become particularly important so as to avoid misunderstanding and confusion.

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METHODOLOGY

The Panel agreed the following two objectives:

1. To understand the resident experience during the allocations process
2. To understand the allocations process

The Panel carried out the following tasks:

Desk Top Review which considered the following documents

- David Hill presentation to KRISP
- Housing Allocations Policy Review 2016
- Housing Allocations Policy Review Consultation 2016
- Members Information Pack
- Housing Allocations Scheme 2017
- Theresa Mayers response to David West re consultation on the Housing Allocations Scheme 2017
- Standard Letters used by Allocations Team

Staff Interviews:

- David Hill, Accommodation Manager
- Claire McLeod, Allocations Officer
- Maggie Nelson, Housing Options Support Manager
- Jacque Goddard, Team leader, Allocations Team

Information from other Councils

- Email interview with Evelyn Gruber, Allocations and Decants Manager, Barnet Homes
- Email interview with Shaun Flook, Head of Housing Needs Manager, LB Camden
- Email interview with Harriet Smith, Letting Manager, Richmond Housing Partnership
- Richmond Housing Partnership Housing Allocations Policy
- Barnet Allocations Policy
- Croydon Allocation Policy

Resident engagement:

- Case Study of resident who had applied for transfer
- Discussion Group with one resident and one prospective resident
- Survey of 44 people who have applied to become a tenant in past 3 years



RECOMMENDATIONS

Below is the complete list of recommendations which have been made following the Panel's investigation. The reasons for these recommendations and findings behind these are detailed in the *Findings and Recommendations* section of this report.

#	Area	Recommendation
1	Allocation Scheme Housing Panel	That there is a formal review of the Allocation Scheme. This should include the role of the Housing Panel.
2	Sheltered Housing	That there is a formal review of Sheltered Housing.
3	Internet Access	That there is monitoring of applicants without digital access so that staff can identify any issues arising and resolve them.
4	Service Downsizing Disability	That KPIs are introduced about satisfaction with the allocations process including downsizing. These should distinguish between successful and pending applicants. The KPIs should include response times, decisions shared, communication, right of appeal and overall rating. KPIs should also capture the experience of disabled tenants.
5	Service	That complaints be reported and monitored in line with the Housing Ombudsman's Complaint Handling Code ¹ .
6	Housing Register	That an email, or letter where applicable, is sent for annual renewal in line with the Allocation Scheme similar to the Electoral Services scheme.
7	Staff	That management are aware of the need to benchmark pay and support for staff.

¹ <https://www.housing-ombudsman.org.uk/landlords-info/complaint-handling-code/>



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8	Staff (Communications)	That staff progress their ideas for improved communication to applicants about the impact of the Cambridge Road Estate regeneration scheme during the allocation process.
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FINDINGS AND RECOMMENDATIONS

Context

1. Current Borough position has 3,200 households waiting for accommodation, 920 homeless people within and 230 homeless people located outside the Borough
2. There were 199 lettings of social housing in the last financial year. This included 69 Royal Borough of Kingston General Needs homes, 80 Royal Borough of Kingston Sheltered homes, 48 Housing Association General Needs homes and 2 Housing Association Sheltered homes.
3. The Housing Options Team receive housing register applications, assess them and sort out the banding. The application then goes to the Allocations Team.
4. The Lettings Plan identifies target groups
 - a. Homeless 53%
 - b. First time 17%
 - c. Existing tenants 14.5%
 - d. Social Services 14.5%
5. Vacant properties are split into Direct Lettings and Choice Based Lettings

Allocation Scheme

6. The current Allocation Scheme was agreed in 2016, and implemented in 2017 following a survey, consultation and an Equality Impact Assessment. It covers policy, practice and procedures. A version is available through the council website.
7. Other London Boroughs also have Schemes in place with largely similar coverage.
8. There appears to have been no formal review of the Scheme since then although it may have been updated as a working document.
9. Good practice would suggest a formal review every three years, and this would need to take into account any issues arising from this investigation plus the Internal Audit, any changes such as the Cambridge Road Estate as well as staff and resident input. There is an appetite from one member of staff interviewed to contribute to such a review.

Sheltered Housing

10. Although there are a number of vacancies these are not always taken up, as they didn't meet the requirements for eligible people to be over 60. KRISP understands that there may have been some placement of homeless people, who did not meet this criterion, in sheltered vacancies.
11. There are longer standing issues around sheltered housing not being fit for purpose. There are also longer standing issues around the Sheltered Housing Policy that were covered in the KRISP Investigation into Sheltered Accommodation in 2017.
12. KRISP understands that a review into Sheltered Accommodation is imminent or has just started. If so this is welcome.

New Homes

13. There is a profound mismatch between demand and supply, which impacts on the ability of the Allocations Team to meet demand. This is compounded by issues around the type of housing available.
14. Last year there were over 3,000 applicants waiting to be housed and only 40 council houses available – and only 5 of these had three bedrooms.
15. This is reflected in other London Boroughs. LB Camden have 280 applications per month, over 6,000 households waiting on the register and fewer than 1,000 homes allocated each year.
16. LB Barnet reported similar issues around the lack of available stock. They do have a LB Barnet owned subsidiary, Opendoor, with Registered Provider status, which is currently building 320 new homes.

Internet Access

17. There was strong support from staff, both Kingston Council and at other London Boroughs, for the switch to Internet access 10 years ago. The Council conducted an Equality Impact Assessment at the time.
18. Staff identified benefits including quicker receiving of applications, financial and time savings, making life easier for applicants as well as environmental benefits around trees and ink.
19. There is acceptance of issues for the digitally excluded and staff referred to officers being available to help. Likewise other London Boroughs are aware of digital exclusion and feel they have addressed this.
20. COVID has deepened the reliance on digital approaches with virtual tours of properties under offer and more use of Internet meetings.
21. In the (on-line) survey there was a minority (17%) saying they had encountered problems when they attempted to bid for a property online. There was also feedback in the discussion group about difficulties with log in and gaining access to the system: "*no-one to help despite repeated attempts to make contact*". There appears to be no monitoring of the digitally excluded. This may account for some of the negative feedback from applicants covered later in this report.

Housing Panel

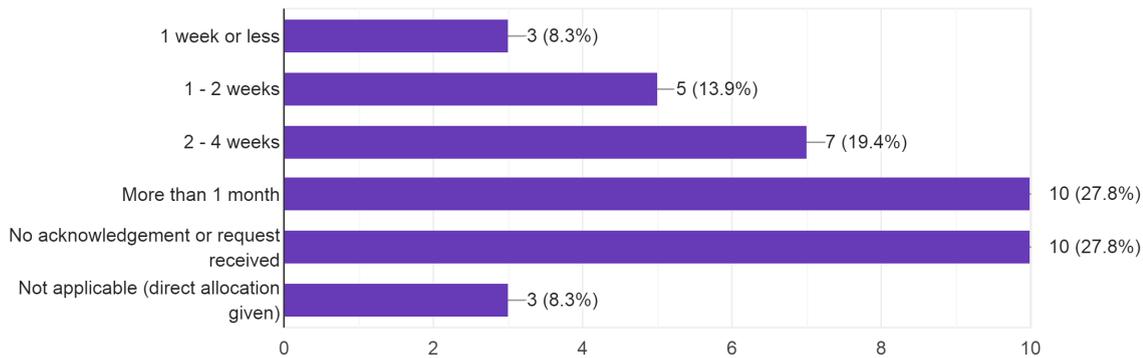
22. Although the role of the Housing Panel is included in an annotation to the Allocation Scheme there was some variation by staff in their understanding of its role. It is unclear whether the annotation is shared with those appealing against decisions.

Service

- 23. Currently there is one known KPI for turnaround time for lettings. There may be others but KRISP does not have these at time of this report. This KPI covers outcome but not applicant experience.
- 24. As already noted in earlier findings there is a profound mismatch between demand and supply. This has been exacerbated by COVID restricting turnaround of voids, staff working and applicants' willingness to move. Staff have referred to delays caused by maintenance works and repairs due to COVID and the impact of finding accommodation for the homeless. It will be further restricted by the Cambridge Road Estate regeneration.
- 25. The survey shows considerable issues around the service received by applicants. In sharing these KRISP notes the pressure placed on staff and the difficulty in separating out feedback about the outcome (a new home) and feedback about the process.
- 26. Regarding response times 28% said that they had received no reply, and another 28% that they had a reply over a month later.

4. How long did you have to wait after application for it to be acknowledged or further information was requested?

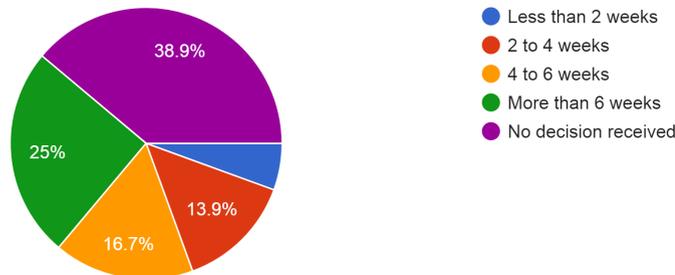
36 responses



27. Regarding decisions 39% said they had not received a decision, and most of those rejected were neither told reasons nor told of the right of appeal (albeit with a small sample).

8. How long did it take for a decision to be made?

36 responses

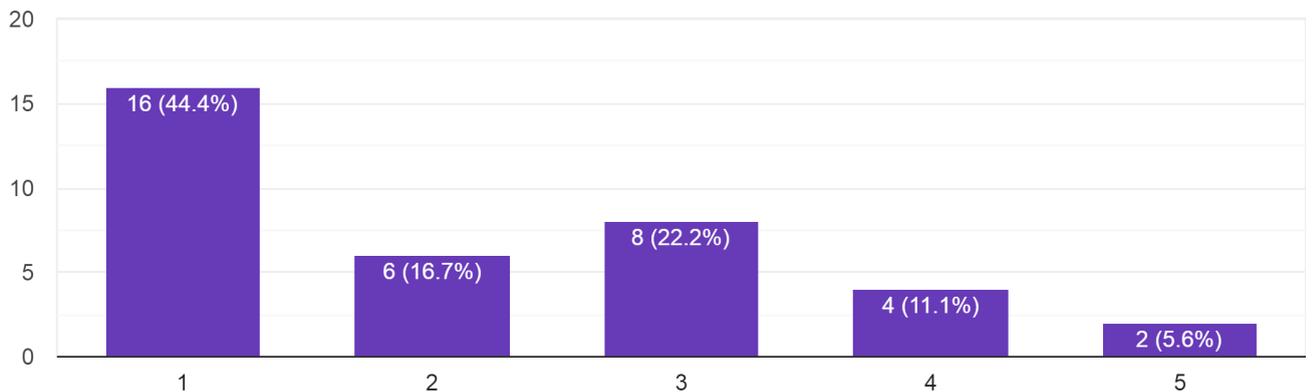


28. On banding 8% were told of their right of appeal and 47% were not told.

29. On timing 25% were told of their likely time, 53% were not told.
 30. The overall rating was 2/5 with 44% scoring the lowest rating.

24. From your own experience how would you rate the Council's bidding process?

36 responses



31. Critical comments received included:

- “When you make contact no-one comes back to you.”*
- “No support, no response, no phone number to speak to anyone”*
- “Not even been acknowledged.”*

32. KRISP notes the introduction of the Housing Ombudsman’s Complaint Handling Code published in July 2020, and that the Council is to self-assess against the Code and publish that self-assessment by 31st December 2020. This includes providing easy access to the complaints procedure and ensuring residents are aware of it, including their right to access the Housing Ombudsman Service.

Housing Register

33. The Allocation Scheme sets out an Annual Renewal process. KRISP understands that this was done initially in 2017, but only once, following implementation of the current Scheme. The member of staff interviewed said there were many ‘old’ contact details.

34. Only 3% of applicants were told of need to renew, with 86% saying they had not been told.

35. Staff also commented on *“inaccuracies in the housing register”* and that *“people don’t update their application details”*.

Downsizing

36. The Allocation Scheme mentions a log of downsizers and under occupiers.

37. The Case Study saw the applicant, all be it a request for a more accessible property, receiving wrong information and described their experience as *“painful”*.

38. There is clearly an issue about meeting downsizing requests. The Accommodation Manager has acknowledged *“there is a wider opportunity to understand who is in our properties and we maximise and manage our stock”*.

Disability

39. Staff acknowledge the difficulty in meeting specific property needs and preferences for disabled applicants. A participant in the Discussion Group also shared this, stating “they waited five years before discovering errors within the information held by officers.” The Case Study saw mixed feedback whereby a flat was eventually gained but without being told of changed rent and other details. Overall that experience was said to be *“unbusinesslike”*.

Staff

40. KRISP were informed that Staff training and support is available, logged and recorded.

41. There is no doubt about the difficult task for Allocations staff. The constraints of supply to meet demand (outlined in the New Homes findings above) have been compounded by COVID causing both more delays and other priorities for housing.

42. As a result there is an increase in dissatisfaction with the service and people being *“unkind”* to staff.

43. With the proposed 80% ring fencing of vacancies for Cambridge Road Estate² decants those constraints and dissatisfaction are both likely to further increase.

44. Staff have rightly acknowledged the need to communicate the situation around the potential impact of Cambridge Road to applicants.

45. There was also feedback about staff pay, in part to recognise their hard work and increased demands of the job, but also to deal with delays with recruitment (over a year for a recent vacancy). Another London Borough also reported issues with recruitment.

PARTNERSHIPS

46. The Allocations teams work with a wide range of partners, as do applicants. This is similar to other London Boroughs.

² Whilst acknowledging that the regeneration scheme will result in 133 more affordable homes

LEARNING

1. Inevitably COVID restrictions impact both on staff work and that of KRISP. Some approaches, such as work shadowing (which would have been used for this investigation) and meeting people have been curtailed. KRISP members have been open to trying different approaches such as discussion groups and conducting interviews virtually. These have worked well, albeit with some reservation that they do not work as well as face-to-face contact.
2. KRISP recognises the tension that exists between its own priorities for investigation and potentially conflicting reviews, such as Internal Audits. KRISP understands the increased pressures upon staff of multiple reviews and will continue to engage with the Council to minimise any unintended adverse impact on staff.



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CONCLUSIONS

While it is necessary, in line with other boroughs, to recognise that providing accommodation for the homeless and those whose homes are unsuitable is a demanding task, it must also be accepted that everyone has a right to a home of their own. The lack of one can lead to feelings of a "lack of worth", plus physical and mental problems, which could place extra burdens upon other resources.

The role of the Allocations Team should be valued by the Council and every effort made to retain existing members while attempting to recruit for identified vacancies.

A number of KRiSP members have raised concerns around the low response to our survey, of which we were informed 2,300 were circulated to applicants and those on the Register. This survey followed the same principles as previous appeals for information, to Kingston residents, and yet the response was significantly lower. Was this due to a fear that by participating they may adversely affect their chances of being housed? Or possibly it highlights a major flaw in the information gathering system currently in use within allocations? Either way 44 responses from 2,300 e-mails sent out is a concerning return rate of only 0.2%. In a previous survey there was a 9% response rate which is what is conventionally expected.

KRiSP members have fed back about the difficulty of organising this review, and the problems some members have with managing their health. There needs to be further recruitment to KRiSP as identified in Recommendation 6 of the KRiSP Review 2021. One new member has been recruited (and contributed to this investigation) however a rolling recruitment exercise is urgently needed for which several KRiSP members are prepared to offer their services. To paraphrase the old quote "It is nearly broken.....Fix it"