



Monday 20<sup>th</sup> November 2023

## HASL's detailed response to Lambeth council's housing allocations consultation

By email only to: [housingpolicy@lambeth.gov.uk](mailto:housingpolicy@lambeth.gov.uk)

### **About HASL**

Housing Action Southwark and Lambeth is volunteer-run community housing group made up of families and individuals who are homeless, living in overcrowded housing or facing other housing problems. With mutual support, protests and campaigns, and legal action we fight together for our housing rights and the high-quality council homes we need and deserve. Our group has been running for over 10 years and we are the largest housing group in Lambeth made up of people in temporary accommodation and others in serious housing need.

Our group is run collectively by our members contributing their time and skills to the group. We have over 1,000 members registered on our group phone to receive WhatsApp messages and we meet over 100 members at our regular group meetings which we run twice every month. We have one paid worker who is paid for 2 days a week and another paid worker who works for 1 day a week, the role of the paid workers is to help with the co-ordination of the group. All our other activities are run by our members dedicating their free time.

We have over 10 years of experience organising support and practical help for each other. Overcrowding and problems with temporary accommodation are the most common problems faced by our members and we have developed a strong knowledge of these issues. At the group meetings we provide moral support and we organise practical support including: sharing rights information, help with interpretation, writing emails, finding lawyers, accompanying to appointments at the housing office and with lawyers, and organising workshops.

Reflecting those worst affected by the housing crisis, our group is made up of migrant women of colour and their families – the group is made up of people from lots of different nationalities and it is really diverse. Many of our members do not speak English as their first language, so we rely on volunteer interpreters. Due to language barriers, our members face additional barriers to accessing decent housing and housing assistance. Very often as well as housing problems, our members are dealing with multiple vulnerabilities and inequalities. Many of our members are also dealing with medical problems and disabilities, giving unpaid care work, dealing with immigration issues and other poverty problems, and some have also been victims of domestic abuse.

### **Introduction**

We understand, first hand, that there is a huge shortage of social housing especially 3, 4, 5 bed council homes in the borough and across London. We know the council face a difficult task due to this desperate shortage of council homes, but this means that having a needs-based allocations

policy is more important than ever to ensure that those with the most urgent housing needs are prioritised. The council can still create a positive vision for council housing through its housing allocations policy. Alongside this, we know that there must be a strong campaign for high quality, safe, secure council housing to challenge national government policies.

For the last 10 years, Lambeth council's housing allocations policy has been a disaster for Lambeth's residents, especially those who are most vulnerable at the worst end of the housing crisis. The current scheme has trapped households in temporary accommodation at the bottom of the housing waiting list with no hope of getting permanent social housing. Two key features of the current policy also facilitate the mass queue jumping ahead of Lambeth residents with long-term housing needs. The scheme saw hundreds of households wrongly removed from the housing waiting list and this was only resolved by legal action supported by us.

The policy is overly complicated which causes residents confusion and distress. Under the current scheme, it is also impossible for most people on the housing waiting list to have any understanding of the waiting time they can expect. Changes to the scheme are long overdue.

We believe the housing allocations policy should be needs based and be as simple as possible to help people have a better understanding of how the allocations policy works and their position within it.

In HASL, we have built up considerable experience of engaging with housing allocations consultations. In the last 3 years we have participated in Lewisham council and Southwark council's housing allocations consultations and facilitated the engagement of hundreds of residents in these boroughs.

Please find below HASL's formal response to Lambeth council's Housing Allocations Consultation. Our response will consider the following issues:

- (1) Responding to the new proposals
- (2) Concerns about the conduct of the consultation
- (3) HASL's template response and outreach

### **(1) Responding to the new proposals**

The council's Housing Allocations Consultation Survey has 6 key proposals for residents to respond to. The survey also gives space for residents to give any other feedback about the new proposals and the functioning of the current scheme (which is 40 pages long). Please find below HASL's detailed responses to the 6 key proposals as well as further comments on the current scheme and suggestions for changes.

#### **(1) Lambeth Council is proposing to move people in temporary accommodation from Band C1 to Band B. To what extent do you agree that Lambeth Council should give more priority to people in temporary accommodation?**

We strongly agree that people in temporary accommodation should be moved from band C1 to band B. The current system is broken. Homeless families and individuals are stuck at the bottom of the housing waiting list meaning that they are trapped in temporary accommodation indefinitely. Being in temporary accommodation should be considered as having a high housing need and awarding band B reflects this.

With homeless applicants moving into Band B it is very important that all the time they waited in temporary accommodation (from the start of their homeless duty in Band C1) should be treated as

time spent in Band B. Otherwise, homeless applicants who have spent years suffering in poor quality temporary accommodation will face losing this waiting time. We imagine that this must be the council's plan, as otherwise 4000 households in temporary accommodation would have the exact same priority/effective date.

In the council's online survey for this proposal, they warn that if households in temporary accommodation are moved into band B, "they would be competing with other groups in Band B who would have longer to wait as a result." However, it may not be the case that others in band B will face a longer waiting time. It would be helpful to have more data and modelling to understand the impact of these changes. If the council stop the homeless prevention scheme and also change 'from time on list' to 'time in band', these two changes will stop queue jumping that currently happens for people in band B and therefore the waiting time for other applicants (those without a statutory homeless duty) in band B may not be significantly increased.

It is important for the council to be aware of how moving homeless households into band B may impact those currently in band B with high housing needs such as for severe medical needs and severe overcrowding. It could be helpful to have more information about the number of people in band B for a severe medical need and an idea of what kind of health issues these people have, and whether they are bidding on general needs or adapted properties, as the council may need this information as part of an Equality Impact Assessment to ensure that disabled people are not significantly negatively impacted by the changes. There may be other options to ensure that these people are not negatively impacted by a possible increase of people in band B – for example, those with an urgent medical need to move may wish to make a homeless application in order to be provided with more suitable housing and will retain their band B. For families who are statutorily overcrowded in housing association homes in band B, we recommend that the council award them band A as the council currently does for Lambeth council tenants who are statutory overcrowded.

(2) Lambeth Council is proposing to move those in Band B for homeless prevention into Band C1. To what extent do you agree that Lambeth Council should give lower priority to prevention cases?

The council's question on the online survey for this 'Homeless Prevention' question is badly worded and needs clarification and is arguably invalid in its current format as it is unclear and restricts how people can respond.

In the question, firstly, it is not clear whether reducing homeless prevention cases from band B to band C1 applies to new cases (after the new proposals are introduced) or whether it will be applied to **all** cases including those who are currently in band B for homeless prevention.

Secondly, the question does not give people the option to say that they do not want a homeless prevention priority at all in the scheme. The only possible answers to this question are agreeing or disagreeing with the statement awarding lower priority to homeless prevention cases.

Under the current scheme, Lambeth residents who engaged with the council's Temp2Settled policy were promised band B and social housing through this route. The council must keep their promise to these people and they should remain in band B. Also, if the homeless prevention band had not existed then most of these applicants would now be in temporary accommodation with a Main Housing Duty. Therefore, the only fair solution is that they have the same priority as homeless households under the new scheme, which is Band B.

Furthermore, as a result of legal action with Public Interest Law Centre (and with practical support from HASL) taken by applicants affected by the Temp2Settled Scheme, Lambeth council signed a

consent order on 27<sup>th</sup> May 2020 confirming that applicants on this scheme would remain in band B as long as they remained in the private rented housing arranged by the council. The consent order gives applicants in band B for homeless prevention a legitimate expectation that they would remain in band B as long as they remained in the private rented housing that the council secured. Therefore, removing them from band B now would be unlawful.

However, going forward, the council should end the homeless prevention band completely. Through the homeless prevention scheme, the council facilitated large-scale queue jumping ahead of homeless families. The Temp2Settled Scheme /homeless prevention also failed to really prevent homelessness – instead, many of those who were involved this policy are still waiting years later for social housing while living in overcrowded, poor-quality private housing where they have faced further threats of eviction. Genuine homeless prevention involves high-quality legal advice to help tenants to stay in their homes as well as wider government policies such as ending section 21 no-fault evictions – but it cannot be achieved through housing allocations schemes.

The Temp2Settled Scheme /homeless prevention is a failure for the following reasons:

- On a very basic level, it is institutionalised queue jumping and it is manifestly unfair. Why should some homeless households have priority over other homeless households simply on the basis of whether they are able to take private rented housing or not?
- It previously saw homeless applicants gatekept and forced onto the Temp2Settled Scheme
- hundreds of applicants were removed from the housing waiting list and then reinstated after a legal challenge
- homeless families are trapped at the bottom of the housing waiting list
- the undermining of homeless rights and the statutory homeless duty - A scheme which encourages families to give up their homeless duty (and the rights and protections that this involves) undermines important homeless rights, for example: being able to do suitability reviews, having priority need, having a reasonable preference and local connection for the housing waiting list. We also noticed another consequence of their scheme having a negative impact on homeless households. As a further 'sweetener' to encourage families to give up their homeless duty, we noticed from first hand experience and FOI data that those accepting private housing were more likely to be housed in-borough than families in temporary accommodation. It seems that in-borough accommodation was being reserved or prioritised for those taking private rented housing over those needing temporary accommodation.
- it has caused confusion and complicated an already difficult and stressful homeless process. It is extremely complicated explaining to people who are homeless or threatened with homelessness what their rights are, what options they have, the possible consequences of giving up a homeless duty, and how the housing waiting list functions due to the complexity of the scheme. Vulnerable homeless applicants are presented with complicated 'options' (between continuing with a homeless duty or taking private rented housing) and the most vulnerable are the most negatively impacted by the unfairness which is inherent in such a scheme. Many people we met on the Temp2Settled Scheme still believed they were in temporary accommodation.
- The scheme has further marginalised and disadvantaged the most vulnerable homeless applicants who cannot access private rented housing, who would struggle to sustain a private rented tenancy or who cannot endure yet another change in accommodation. We know that private landlords discriminate against prospective tenants based on race, disability, claiming benefits, and that numerous government policies encourage this

discrimination such as Right to Rent and the benefit cap. Therefore running a policy which relies on the private rented sector will further exacerbate this discrimination as these groups are not only rejected from private rented housing but it impacts their position on the housing register.

The council seem to recognise these problems and it is likely that this is a key motivation behind the housing allocations consultation.

Neighbouring local councils Lewisham and Southwark do not have a homeless prevention band in their housing allocations policies, and our experience is that their allocations work much better and prioritise those most in housing need. This allows those in temporary accommodation to successfully bid on social housing.

To protect the rights of those who are currently in Band B for homeless prevention and live outside Lambeth, the council should add into the new housing allocations policy that they should have a local connection for homeless applications.

It would be helpful to know how many people are currently in band B for homeless prevention and how many people have been successful in bidding for permanent housing in band B for homeless prevention under the current policy.

#### Lambeth case study of Temp2Settled Scheme

A single mum describes her experience of Lambeth council's Temp2Settled scheme which saw her housed in overcrowded private rented housing in serious disrepair and facing numerous eviction attempts. Lambeth council also removed her from the housing waiting list after 2 years due to no longer having a local connection but she successfully challenged this along with other Lambeth families with the support of HASL and Public Interest Law Centre.

*I first encountered Lambeth council's 'Temp2Settled' Scheme when I became homeless in 2017 and was at my most vulnerable. The council officers sugar coated the nature of the Scheme and persuaded me to agree to enter into it – they told me that it was the best option for myself and my baby as we would be provided with permanent council accommodation in our home borough within a matter of weeks. However, I later discovered that relying on this advice had put myself and my daughter at great risk. The conditions of the property I was placed in were very poor and it was not safe for us to live in. I have also been threatened with eviction on several occasions.*

*My intention has always been to do right by my daughter and to do the best for her. I believe that Lambeth Council took advantage of this and of me when I was at my most vulnerable and when I had no choice but to place my trust in them. When given the option of a stable and secure home for my daughter, of course I was going to take that – even if it meant living away from our home borough for what I was told would be a short period of time.*

*My daughter is now 3 years old and at the crucial age of starting nursery and settling down for the starting of her educational life. This should be an exciting time for us, but the consequences of the council's scheme (the suitability of accommodation, threats of eviction and being forced away from the place I call home) had impacted us both greatly – causing so much stress and anxiety. Not*

*knowing what my future for my daughter looked like and whether we would be able to return to our home borough, made making important life decisions for me very hard.*

*I am proud of myself and of all the other residents who stood up to the council and I hope this sends them a message that council officers cannot continue to treat us like we are just numbers which they need to reduce at any cost. We are human beings and have families, just like they do."*

(3) Lambeth Council is proposing to limit the number of times you can refuse offers of social housing. Those in temporary accommodation will not be able to refuse an offer anymore, and others will only be able to refuse once. To what extent do you agree that Lambeth Council should place limits on the number of housing offers for the following categories of applicants?

We strongly agree that there should be limits on the number of refusals that people can make in order to reduce the waiting times for properties for everyone. But any limit on the number of refusals should be the same for everyone on the housing waiting list in order to avoid confusion. We think that allowing everyone to have 3 refusals is fair and reasonable.

If homeless households only have one offer of permanent social housing, the consequences for homeless families of refusing this offer are incredibly serious – they can have their homeless duty ended and be evicted from temporary accommodation leaving them destitute. These serious consequences were not highlighted in the council's online survey. It is only fair to give people a second chance and to avoid such a drastic punishment for what is often an honest mistake. We have also known that the property adverts can be inaccurate, and people would not have bid otherwise. Making homeless families destitute by ending their homeless duty does not help anyone and allowing some flexibility in this situation is really important.

It is important to have consistency across the whole allocations scheme to promote fairness and also to avoid confusion. If there are different refusals/offers for those in temporary accommodation and then everyone else on the housing waiting list, it can cause confusion. Someone in temporary accommodation might hear from someone else on the housing waiting list about how they refused an offer of permanent housing, so they might think that this applies to them as well.

It is not clear what will happen if people use up all of their offers/refusals. It would be helpful to have more information about this.

It would also be helpful if the council could clarify if someone refusing an unsuitable offer will have this offer/ refusal counted against them or if this refusal will be disregarded if the offer is unsuitable.

In HASL, we have seen how allowing people unlimited refusals/offers on properties significantly increased the waiting time for others on the housing waiting list. In one case, a HASL family were number 52 for a property but they were only invited for a viewing of the property over 6 months after they first bid, because everyone ahead of them was invited to a viewing and refused. This is clearly an inefficient system which means that people with severe housing need are waiting longer before they can move into permanent social housing.

(4) Lambeth Council is proposing to remove Band D from the housing waiting list. This means people in Band D will have their account closed and people who are not in a priority group will not be allowed to join. To what extent do you agree that Lambeth Council should restrict access to the housing register to those who have a chance of being allocated a home?

We strongly disagree with this proposal to cut the housing waiting list. The housing waiting list is an important tool to show central government and others the desperate need for more social housing in Lambeth – cutting the housing waiting list hides this need. The housing waiting list is a useful resource for the council and other organisations to get an understanding of the need for social housing in our borough, the waiting list helps the council to build an understanding of how much social housing is needed in the borough, the size of social housing that is needed, the amount of adapted housing, as well as other things.

The growing housing waiting lists across the country are a political statement which show the national government the desperate need for massive investment in council housing – both investment in the current stock as well as a huge expansion in the number of homes.

It is not fair to exclude people from joining the housing waiting list just because they do not have a housing need at this moment. All Lambeth residents should be able to register their interest and need for permanent social housing in their borough. The council's survey expresses concern that thousands of families are putting 'time, effort and emotional energy' into bidding when they have no chance of being offered a home. However, most people who are in band D will understand that they are at the bottom of the housing waiting list and this will be clear from their positions on properties so hopefully this will help to manage their expectations.

Many people in Band D will likely have a housing need in the future and it will be useful that they already have an active application and have an understanding of how the bidding system works – especially if their housing need is very urgent. For example, a family may be in band D but then they may suffer from domestic abuse or a medical emergency or enforcement action in their home and they may qualify for band A. Having an active application and knowledge of the bidding system will be extremely beneficial in these emergency circumstances where acting quickly is vital.

One reason the council provides in the survey is that the waiting list uses resources for complaints and review requests. However, complaints and review requests nearly always arise because a person believes they do not have the correct priority. This will still be an issue under the proposal, they will just be reviewing/complaining about not being allowed on the waiting list, rather than about their priority. Therefore, we think the saving of resources will be minimal.

It would be helpful to know how many people are currently in band D on the housing waiting list as this information is not provided in the council's survey.

(5) Lambeth Council currently decide the position within priority bands by the amount of time you have been on the waiting list. They are proposing to change it so position within priority bands is decided by how long you have been in a band. To what extent do you agree that waiting time should be based on time within a band rather than time of application?

We strongly agree that 'time in band' is better and fairer than 'time on list'. By ordering applicants according to time in band, people's positions on the housing waiting list are based on the amount of time that they have been in housing need. This is fair and important. Time on list allows people who for years had no housing need (or a low housing need) to queue jump ahead of people who have been in high housing need for years, which is unfair. Time in band will accurately reflect people's housing needs and help those in the worst housing.

This proposal is key to ensuring that Lambeth council's allocations policy will be a needs-based policy. It will also help people – and the council itself – to have a better understanding of waiting times for each band because there will not be the constant issue of people in lower bands with more time queue jumping ahead when they enter a higher band.

The current system of time on list benefits people who had the knowledge and ability to join the housing waiting list early on. It disadvantages more vulnerable people who were not aware of the housing waiting list or could not join (due to language barriers or lack of IT skills). The current system also discriminates against those who have had to flee to Lambeth due to domestic violence, and also refugees who have had to flee to the UK as refugees. This is because both of these groups cannot build up time on Lambeth's waiting list before they are in housing need.

Neighbouring local councils Lewisham and Southwark both also use a 'time in band' system for their housing allocations policies. Our experience is that their allocations schemes work much better and prioritise those most in housing need. This allows those in temporary accommodation to successfully bid on social housing within a relatively reasonable period of time.

With homeless applicants moving into Band B it is very important that all the time they have waited in temporary accommodation in Band C1 should be treated as time spent in Band B. Otherwise, homeless applicants who have spent years suffering in poor quality temporary accommodation will face starting their wait again.

There is a practical issue for the council in terms of implementing this proposal. The council will have to ensure that applicants' housing register accounts are registered for the time they qualified for that band and this will involve the council having accurate and up to date data for every applicant. A Freedom of Information request from 1 year ago shows that the council does not hold this information. This is not a reason to reject this proposal but the council will need to have a plan for implementation ahead of launching the new scheme. The council will need to provide a time in band date for everyone and notify them of the new date before implementation, so that people have the opportunity to review it if they think that it is incorrect.

For example, one of our HASL members was living in severely overcrowded housing. She qualified for band B due to the severe overcrowding in her private rented home and had built up 8 years waiting time. Then she was evicted and moved into temporary accommodation where her account was updated to band C1. She has lived in temporary accommodation for 4 years. If the council put all families in temporary accommodation into band B, she should now qualify for band B. But her time in band B now (as a homeless household) should be backdated to the time when she first qualified for band B for being severely overcrowded. In practical terms, her new registration date under the new policy should be the same as her current registration date under the current policy as she qualified for band B when she first joined the housing waiting list (and would have continued to qualify for Band B the whole time if Band C1 is reclassified as Band B). However, if she had been not been severely overcrowded in her private rented flat and was only overcrowded in band C2 before she was evicted and moved into temporary accommodation, then her new registration date under the new policy would be from the date she moved into temporary accommodation. This example demonstrates how in certain cases this issue can get complicated, and why the council needs an implementation plan.

(6) Should Lambeth Council require applicants to log in occasionally to keep their accounts active?

No, keep the system as it is. The risk of requiring applicants to log in occasionally means that more vulnerable people, for example people without digital skills or who do not speak English as their first language, could risk having their bidding accounts closed.

Someone in band C2 could understandably give up bidding for a long period of time after years of bidding unsuccessfully, but this does not mean that they do not have a housing need. Or they could



have lost their login details, and because they were not close to being successful or have language barriers, they may not have contacted the council about this.

If there are accounts that have been inactive for an extended period of time such as 3 years, the council could send an email or letter to the applicant reminding them about their account, providing a reminder of their login details, and reminding them to do a change of circumstances application if they have had any change of circumstances.

#### (7) Any other comments

7.1 - Currently only council housing tenants who are statutorily overcrowded qualify for Band A. This unfairly excludes housing association tenants who are statutorily overcrowded. Those in housing association homes should be included alongside council tenants in band A for statutory overcrowding.

7.2 - From Freedom of Information requests and also from direct experience, we have noticed that Band A for enforcement is not being implemented properly by the council. We have also struggled to get the council's environmental health and enforcement team to make referrals for band A for enforcement. There needs to be training on this priority so that people affected by enforcement action can access their rightful position on the waiting list.

7.3 - Band A is the council's emergency band. There should be an expedited and clear procedure for emergency band A requests and these should be processed within 48 hours. From the council's housing allocations policy, it is not clear who to contact or what the process is for requesting band A in emergency situations

7.4 - People who have become homeless as a result of domestic abuse should have two years extra time added to their housing register account to reflect this additional need

7.5 - Remove the rule banning family members aged 21 and above from housing register applications.

7.6 - The bedroom entitlement rules are very strict. The current policy says the children of the same gender can share until 21 years old. This should be reduced to 16 years old (and ideally every child should have their own bedroom).

7.7 – The current scheme appears to require joint applicants to start their waiting time again if their relationship breaks down. If there is relationship breakdown, applicants should not lose their waiting time. The current rules discriminate against women. They discourage women from leaving abusive relationships. Also, women normally take on the caring of children after relationship breakdown and therefore are in higher housing need than their partner. They should not be further disadvantaged by being required to start again, and have to wait many years more.

7.8 - The council states on the online survey that "*Lambeth has more applicants on its waiting list than any other council*". One possible small reason for this is that applicants can end up with multiple housing register accounts through no fault of their own. We have noticed that when someone has a homeless duty accepted, they are awarded a new bidding account even if they had a bidding account before their homeless application. We have had to help people make complaints in order to get their new account backdated to the date when they first joined the housing register. When homeless applications are being processed, housing officers should check with the applicant and on their system if the applicant already has an account. Existing accounts should then be updated, rather than opening a new account.

7.9 - The council currently awards band A to council tenants on estates earmarked for demolition. Estate demolitions not only are normally bad for the environment, but they lead to the loss of council housing for many years during the redevelopment (even if there is a like for like replacement of social housing). For example, if an estate of 200 council homes are vacated for demolition and it takes 5 years to build their replacements (from date of vacation), then 1000 years of social housing is lost. This is significant and causes homeless households longer waits in temporary accommodation. We believe the council should commit to refurbishing, not demolishing, and therefore should remove this Band A priority from the scheme.

## **(2) Concerns about the conduct of the consultation**

### Short time frame for feedback

The council opened the consultation on Monday, 9 October 2023 at 1.00pm with a deadline of Monday, 20 November 2023 at 11.59pm. This is just 6 weeks. Furthermore, this consultation came completely out of the blue. There was no advance warning or notice from Lambeth council that they were looking to launch a housing allocations consultation. In order to ensure meaningful and productive engagement with the consultation, it would have been helpful for the council to have notified community groups, advice services and other local community stakeholders that a consultation was being launched. It could have been useful for housing staff from Lambeth council and local community stakeholders to have had a meeting where we were able to look at an early version of the council's survey with the opportunity to give feedback before it was launched.

We first became aware of the consultation when a member of our group told us about it on 10<sup>th</sup> October 2023.

As the council acknowledge themselves, this is the first time in 10 years that they have done a consultation on the housing allocations policy. It is disappointing that the consultation has been rushed through in this way without giving adequate time for Lambeth residents and organisations to engage with the consultation and submit feedback. In order to meaningfully engage with the consultation, people need to have a good understanding of the current rules and also a good understanding of the new proposals. This is not a simple task and therefore having enough time to think about and understand the current rules and new proposals is really important. The changes being proposed are an overhaul of the housing allocations policy affecting some of the most vulnerable residents. The new scheme will be with us for years to come. Considering the importance of this consultation, we are really disappointed that the council did not engage early on with local stakeholders and extend the deadline to allow residents more time so that the consultation could be conducted as well as possible. The consultation is a unique opportunity to engage with people who need and support social housing and we feel this important project has not been done justice.

We raised our concerns about the need for more time to the council early on in the consultation process, however, the council refused an extension of the deadline. With both Lewisham and Southwark housing allocations consultations, these councils did agree to extensions in order to allow residents more time to engage with the consultation.

As a volunteer-led group which has been extremely busy on the front line of the homelessness crisis, it has been extremely challenging for us to engage with and respond to this vital consultation. As well as our regular activities supporting our members with housing problems, many of which are extremely urgent, we have been struggling with a wave of illness in amongst our core members which has also severely limited our capacity. We have done our best to understand and respond to the consultation and support our members and other residents to do this as well. Our template

answers and this detailed response are our initial thoughts based on information we have available to us. As we have highlighted throughout our response above, there is more information and detail that we need in order to make more informed opinions and suggestions on the housing waiting list proposals. We would have benefited from having more time.

We are also aware of a Lambeth advice organisation that has been unable to engage with the consultation due to not having the time and capacity. This shows that the council are missing out on important perspectives because of the out of the blue launch of the consultation and the short time frame.

#### Problems with the online survey

As we pointed out in our email to the housing policy email address on 17<sup>th</sup> October, question 2 asking 'how do you occupy your home?' does not have options for people who are homeless and insecurely housed such as 'temporary accommodation' or 'homeless/sofa surfing' or 'staying with friends or relatives'. We think these categories are important to include as these people some of the most affected by the housing allocations policy. It is important that the council understands how many of the responses are from those in temporary accommodation and that they have been fairly represented.

It could also have been useful to have questions about whether someone is currently on the housing waiting list or not and also about their connection to Lambeth.

The introduction to the online survey states: "We are not proposing major changes...". This is misleading because a number of the proposals in the survey are major changes – for example, the proposal to move 4,000 households in temporary accommodation into band B, and to change the whole system by which priority within bands is calculated.

Above we highlighted how question 5 of the survey on Homeless Prevention is invalid as it is not clear if this proposal would apply to all band B Homeless Prevention or simply new applicants. It also does not allow people the option to end the Homeless Prevention band entirely.

The survey also had significant problems with question 6. For example, it does not allow someone to say they agree with restricting the refusals, but they do not want homeless households to not be allowed any refusals. Furthermore, the survey does not highlight the serious consequences of not allowing homeless households any refusals (as proposed).

#### Need for more information

As we have raised in our detailed response above, there are a number of questions that we have that would help us to have a better understanding of the impact of the new proposals. We also gave examples of other information that would be useful to have in our email to the housing policy team on 17<sup>th</sup> October where we requested:

*Can the council provide more information on the expected impact of the new policy proposals including any statistical analysis – for example, under the current policy, there are a total of X number of people in band B, under the new policy there will be total of X number of people in band B. Another example would be: under the current policy a family is waiting in temporary accommodation for a 3 bed home for an average of X years, under the new policy the same household would be waiting an average of X years. As another example, the council could also provide the median priority required to obtain two bedroom accommodation under the old and new scheme.*

This is particularly important because the proposals interact with each other, eg. the proposed changes to waiting time and priority bands.

### Need for information in community languages

As we pointed out in our email to the housing policy email address on 17<sup>th</sup> October, it is important for the survey/ consultation to be in community languages in order for people who do not speak English as their first language to engage with the consultation.

When we raised this for Lewisham council's consultation, they updated their online form to notify people that interpretation could be arranged. In response to our request to Southwark council for information in community languages, they made a leaflet for their consultation which had information about interpretation/translation services if people needed it.

From our experience with Southwark's consultation, when we made template answers in Spanish, there was a very strong uptake to this showing the need for information in community languages.

For this Lambeth consultation, we had hoped to write information in Spanish and Tigrinya which are the main community languages of our Lambeth members, however, due to the short time frame and lack of capacity, unfortunately, we were unable to do this.

### **(3) HASL's template response and outreach**

Over last 6 weeks, our volunteer-run group has dedicated a lot of time and effort discussing, planning and organising the best and most accessible ways to engage with our members and other Lambeth residents most affected by the proposed changes. As listed above, there are numerous challenges and barriers to this important task of listening to and engaging with our members with the main one being the short time frame for responding to the consultation. We would have liked to have done more outreach and drop-in sessions to speak with our members and other Lambeth residents about the consultation.

Our first task was to try and understand all the new policies ourselves. There was limited accessible information from the council as there was only the online survey and a Frequently Asked Questions leaflet. Being able to engage with the consultation meaningfully involves having a good understanding of the current housing allocations policy and then how the new proposals would work and how they will interact with each other. The consultation is also an opportunity to raise other recommendations and proposals for the housing allocations policy, so it's not just about responding to the council's proposals, but about any recommendations that could improve the current policy.

We held a meeting for Lambeth members of HASL in Brixton to discuss the housing allocations consultation and feedback and responses. The meeting lasted 2 and a half hours and about 50 people attended the meeting which was called at short notice (due to us only finding out about the consultation at short notice and therefore needing to engage with our members as early on as possible in order to create our group responses). About half the group were in temporary accommodation and everyone else was overcrowded in private rented housing or social housing. We had 2 groups, one in Spanish and one in English. Within the 'English speakers' group, many did not speak English as their first language, so many people did still experience language barriers/ unaddressed language needs.

We gave a brief introduction about how the current allocations policy works and then we discussed each of Lambeth's proposals and listened to people's feedback and responses and answered questions. It was a challenge discussing the 6 key proposals as this is a lot of information to cover.

And it was difficult explaining the proposed rules and how the proposed changes will interact - if they are all implemented. But there was lots of good discussion, points and questions and we received lots of very valuable feedback. We started with the most complicated and significant changes first – Temporary Accommodation, Homeless Prevention, and Waiting List Times – to make sure that we had enough time to cover these in detail.

A key issue that was clear was that some people did not understand how the current policy works and some were understandably preoccupied with their immediate housing problems. However, overall because many of the attendees were long-term HASL members, there was a very good understanding of how the current scheme works which helped with understanding the new proposals. We also had some good discussions about what makes a fair housing allocations policy and we discussed about how we need to look at the wider picture beyond our immediate cases. This commitment to a fairer policy and having consideration for everyone is shown by the fact that everyone strongly agreed that Band D should not be removed even though no one there was in band D, as people did not want others to be excluded from the waiting list.

We used the feedback from this meeting to prepare answers to each of the proposals. We used a google form so that our template answers were easy to read and use. The template answers were editable on the google form so that people could leave their own personalised feedback if they wished, or remove parts they disagreed with. We used the council's equalities information questions to try to make sure that this important information was also captured in our online form and we also added a question asking for their connection to the borough.

We shared our online form through our email list, WhatsApp messages, and on our social media. We also held drop-in session for 4 hours in Brixton with Spanish and Tigrinya interpreters for people to ask questions and get help filling in the form, with 40 people attending this drop-in. A question which has been asked by people quite a lot is about when the new rules will be brought in, however, there is not a publicly available timeline for the consultation process so we have been unable to answer this.

Another issue of the short timeframe of the consultation is that we could not engage with local media. With the previous Lewisham and Southwark consultations we had time to engage local media and raise awareness of the proposed changes, and our members' views about them. This is an important democratic process, that allows different interpretations of the council's proposals to be aired.

If you have any questions or clarifications about our feedback, please do not hesitate to contact us on [haslcases@gmail.com](mailto:haslcases@gmail.com)

Please do keep us updated on the next steps of this consultation as we are keen to continue to engage with this.

Yours faithfully, Housing Action Southwark and Lambeth