

## **Devon Home Choice 2021 Consultation Feedback**

The Devon Home Choice (DHC) policy review ran from 1<sup>st</sup> November 2020 until 1<sup>st</sup> April 2021 and sought views on the Devon Home Choice Policy and proposed changes which are due to come into effect from 1st May 2021.

The consultation was carried out using an online questionnaire with a paper version of the form available for use by those unable to access the on-line form.

The consultation was publicised on the Devon Home Choice website, by email to all active DHC applicants and by DHC partner local authorities and landlords providing notifications to agencies including:

Age Uk  
Alabare  
Barnardos  
CAB  
Devon & Cornwall National Probation Service  
Devon & Cornwall Police  
Devon and Somerset Fire & Rescue Services  
Devon Communities Together  
Devon County Council

- Adult Social Care
- Children's Social Care
- Youth Offending Team
- Occupational Therapists
- Early Help (North)

Devon Partnership NHS Trust  
Devon Refugee Resettlement Group  
Encompass South West  
Freedom Social Projects  
North Devon Against Domestic Abuse  
North Devon Clinical Commissioning Group  
PATH  
Probation Services Ministry of Justice  
RBL  
Shekinah  
Shelter  
Splitz  
SSAFA  
Together Drug & Alcohol Service  
Wessex Community Assets

This report contains a sample of the comments provided only. All comments have been made available for consideration by the Devon Home Choice Management Board and all which relate to a specific local authority have been brought to the attention of that authority.

Thank you to everyone who took time to complete the survey.

### **Section 1 - About you**

A total of 391 responses were received. A breakdown of the respondents is shown in Chart 1 below.

**Chart 1: DHC consultation respondents**

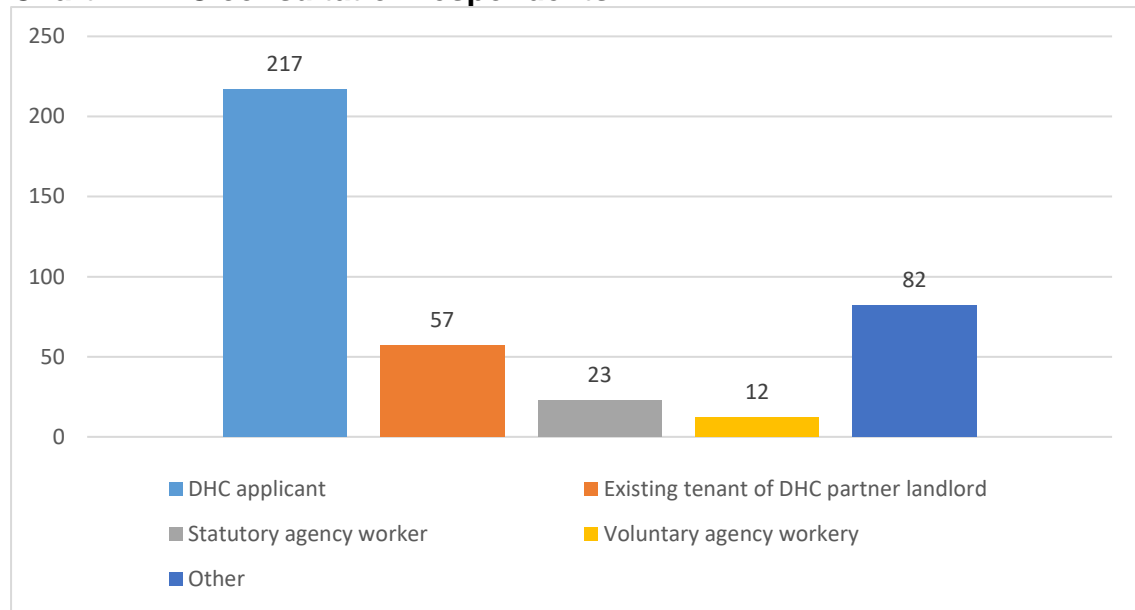


Chart 2 below shows the local authority where the applicant lives for those who advised that they are either DHC applicants or existing tenants of a DHC partner landlord. Given the large proportion (54%) of respondents who have advised that they live in East Devon it seems possible that many have simply chosen the first option from the drop down menu on the on-line form. A similar proportion of respondents (53%) also advised that they are seeking to live in East Devon

**Chart 2: DHC applicants and existing DHC tenants by local authority area where they live,**

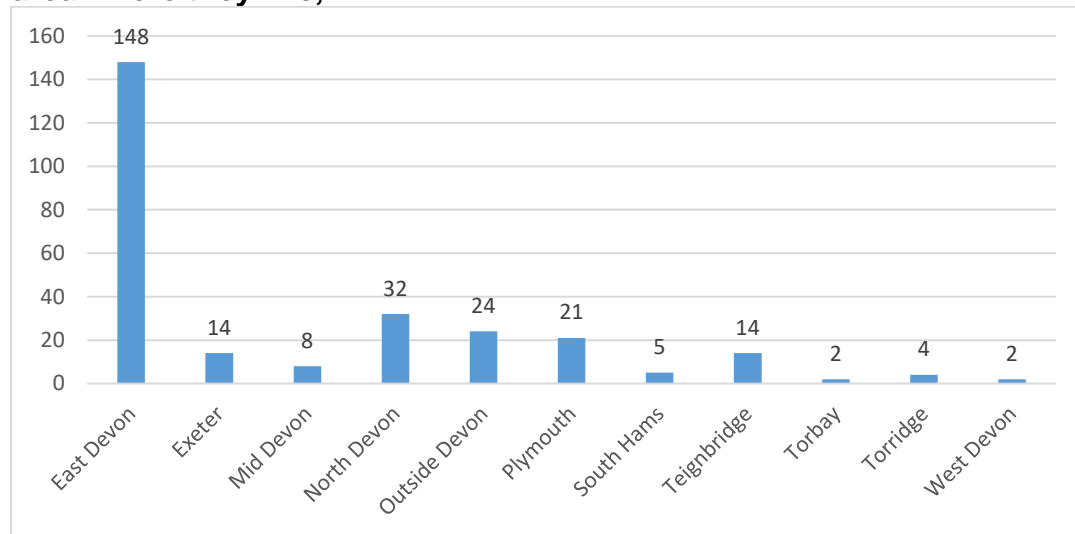
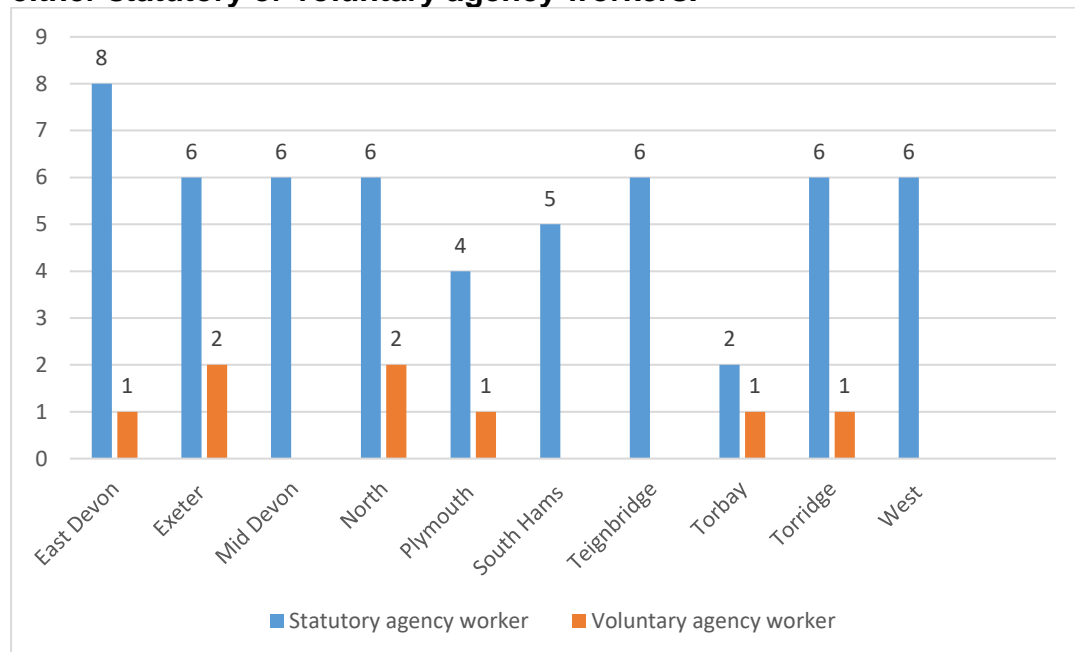


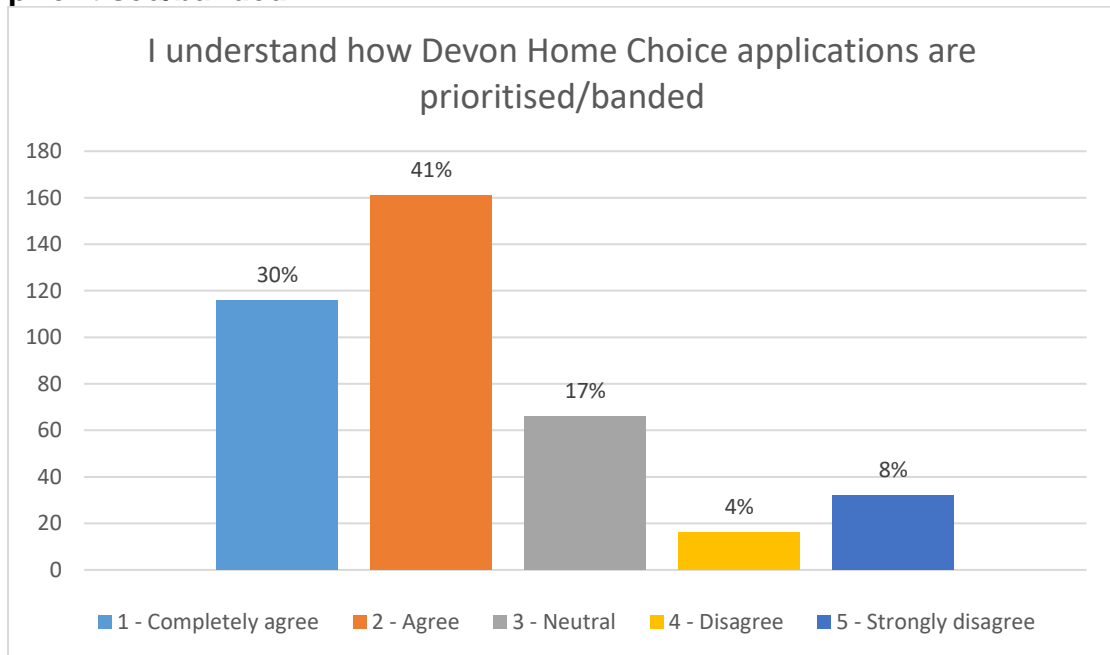
Chart 3 below shows the local authority areas worked in by respondents who have advised that they are either statutory agency or voluntary agency workers. Where respondents work in more than one area they have been included in the figure for each area.

**Chart 3: Areas worked in by respondents who advised that they are either statutory or voluntary agency workers.**



**Section 2 – Priority and how it is awarded**

## 1) I understand how Devon Home Choice applications are prioritised/banded.



71% of respondents agree with the statement 'I understand how Devon Home Choice applications are prioritised/banded'. 12% of respondents disagree.

62 of 391 respondents left a comment relating to this question.

### Common themes amongst the comments received:

- **Length of time on the waiting list should be given more priority rather than giving banding ultimate priority over waiting time.**

Management Board response - The DHC Policy is required to prioritise applications based on the level of need (band). Waiting time is taken into account within the different priority levels using the band start date.

- **Age restrictions on properties cause problems for people with disabilities.**

Management Board response - Some housing, such as sheltered housing is specifically designed for older people. For disbursed housing units age restrictions are considered by the landlord prior to advertising. The DHC partnership is actively looking at how we can increase the availability of accessible homes.

- **More flexibility should be allowed to cater for personal circumstances and affordability issues.**

Management Board response – The Policy allows each individual application to be assessed taking into account personal circumstances. Affordability does not fall into reasonable preference categories defined in the Housing Act 1996 so does not receive priority banding. Local

authority Housing Options teams and/or independent advice agencies should be contacted in the first instance for advice and assistance if applicants are struggling with affordability issues.

- **Extra bedroom need should be allowed to cater for growing families and split families.**

Management Board response - Due to the shortage of family sized accommodation we are only able to allocate homes based upon current need. Allocating homes larger than current need could also lead to shortfalls in housing benefits. The policy does make some allowance for growing families by taking pregnancies into account and allowing the extra bed space prior to the birth of the child.

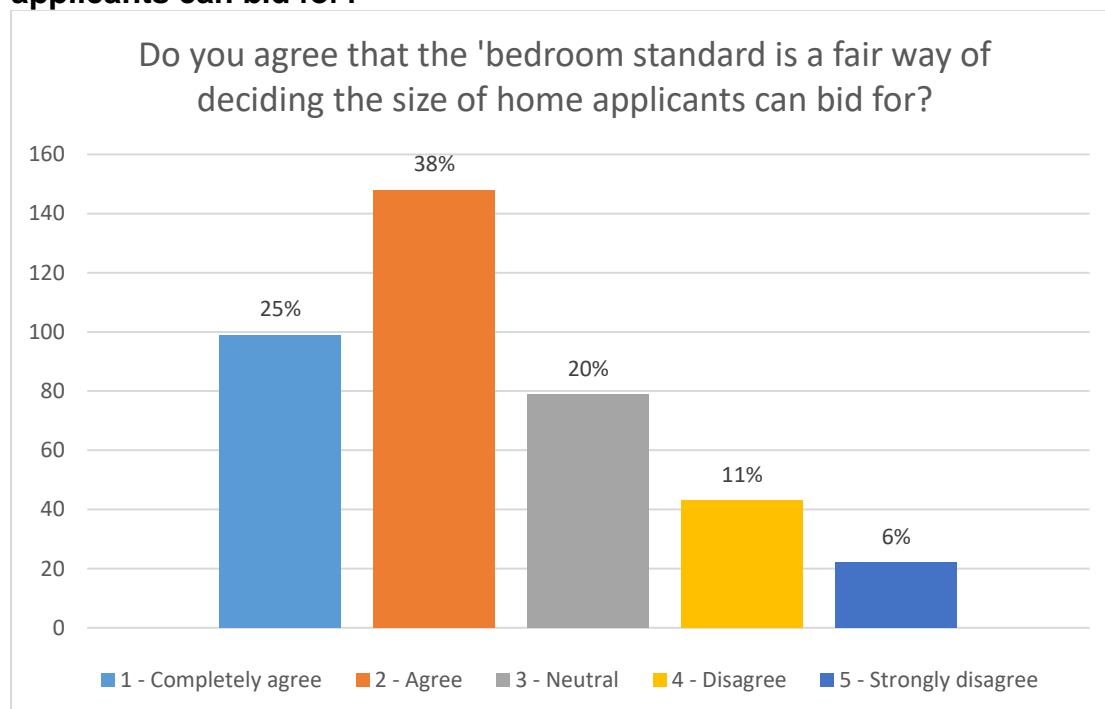
Normally only one parent will be allocated a bed need sufficient to accommodate their child(ren). This follows the precedent set down in Holmes-Moorehouse v Richmond. Applications are considered on a case by case basis but must be balanced against the availability of family sized homes. This policy is also aligned to that used for the calculation of Housing Benefit.

- **Priority should be awarded for poor living conditions such as damp and mouldy accommodation.**

Management Board response - Our aim is to improve the standard of housing rather than allow properties to remain in a poor condition for the next person to move in. Tenants should work with landlords and where necessary local authority Environmental Health teams to address housing defects. The policy does allow for priority to be awarded for housing defects which cannot be rectified in a timely manner.

2) Devon Home Choice uses the ‘bedroom standard’ to assess the size of home applicants need (see section 3.18 of the policy). This means that children of the opposite sex can share a bedroom up to the age of 10, children of the same sex between the ages of 10 and 1 can share a bedroom and anyone over the age of 16 is allocated their own bedroom need.

**Do you agree that this is a fair way of deciding the size of home applicants can bid for?**



70 of 391 respondents left a comment relating to this question.

83% of respondents agree or are neutral that the policy for bedroom need calculation is fair.

Although only 17% of respondents disagree/strongly disagree that this is a fair way of calculating the bedroom need of a household 47% of those who left a comment felt that way.

Common themes amongst the comments received:

- **The age range for children of the same sex being able to share a bedroom (0-15) is too wide.**
- **There are differing views as to the age at which children should be allowed their own bedroom, ranging from 7 to 18 years old.**
- **The age up to which children of the opposite sex can share should be lower.**

Management Board response – The bedroom need calculation in the policy is aligned to that used for the calculation of Housing Benefit. This will ensure that tenancies are affordable.

- **Flexibility is required to take special needs and circumstances into account**

Management Board response – There is flexibility in the policy to allow additional bedroom need where there is evidence that it is required. See policy paragraphs 3.18.9 – 13.18.13.

- **Allowance should be made for growing families where the bedroom need will increase in the future.**

Management Board response - Due to the shortage of family sized accommodation we are only able to allocate homes based upon current need. Allocating homes larger than current need could also lead to shortfalls in housing benefits. The policy does make some allowance for growing families by taking pregnancies into account and allowing the extra bed space prior to the birth of the child.

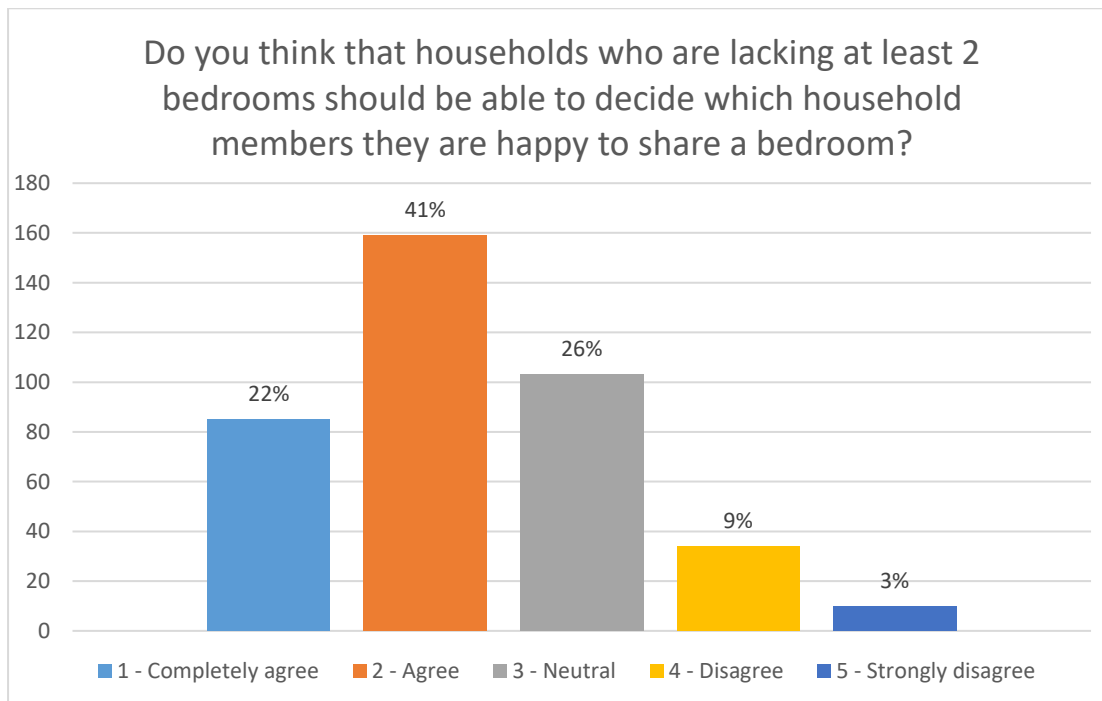
- **Bedroom need should be allocated to both parents where there is shared custody.**

Management Board response - Normally only one parent will be allocated a bed need sufficient to accommodate their child(ren). This follows the precedent set down in Holmes-Moorehouse v Richmond. Applications are considered on a case by case basis but must be balanced against the availability of family sized homes. This policy is also aligned to that used for the calculation of Housing Benefit.

- **Size of bedroom should be taken into account.**

Management Board response - Where there are 2 people or children sharing a bedroom which has been confirmed by an RP or Environmental Health as not being big enough for 2 people/ children to share the application will be placed in Band C as lacking a bedroom. Please see paragraph 31.7 of the DHC Procedures Manual.

**3) Do you think that households who are lacking at least 2 bedrooms should be allowed some flexibility to decide which household members they are happy to share a bedroom (e.g that 2 siblings of the same sex over the age of 16 can share a bedroom)?**



28 of 391 respondents left a comment relating to this question.

82% of those who left a comment agree or are neutral that households who are lacking at least 2 bedrooms should be allowed some flexibility to decide which household members they are happy to share a bedroom.

Common themes amongst the comments received:

- **The majority of respondents who left a comment felt that the family are in the best position to make this decision and should be allowed to do so.**
- **Some respondents felt however that people over the age of 16 require their own bedroom.**

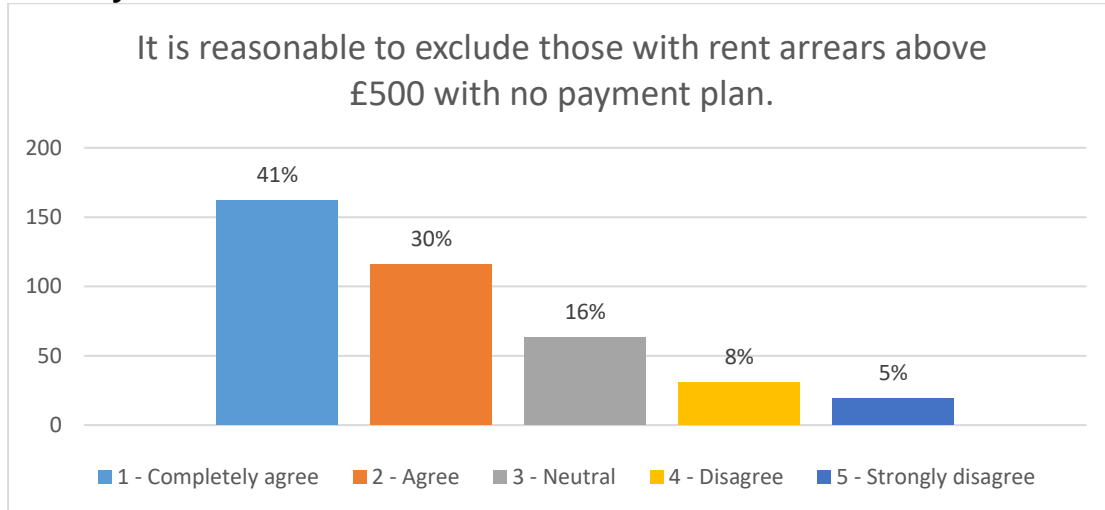
Management Board response - The Board agreed that this should be allowed for those needing 4 bedrooms and above.

- Applicants who move into a home which is smaller than their calculated bedroom need may re-apply to the register but will have their application re-banded and the band start date reset.
- Homes will still be subject to a maximum occupancy level and allocation will still be at the discretion of the landlord.



### Section 3 – Rent Arrears

**1) It is reasonable to exclude those with rent arrears above £500 with no payment plan as it does not demonstrate a change of behaviour if they do not address former debt therefore increasing the chances of a risk of tenancy failure.**



65 of 391 respondents left a comment relating to this question.

71% of respondents agree that it is reasonable to exclude those with rent arrears above £500 with no payment plan from the housing register.

#### Common themes amongst the comments received:

- **Individual circumstances should be taken into account.**

Management Board response – Applications are considered individually and exceptional and individual circumstances may be taken into account. Please see policy paragraphs 2.6.3 – 2.6.4.

Victims of domestic abuse who have been subject to controlling behaviour, and have accrued rent arrears as a result are exempt from this sanction.

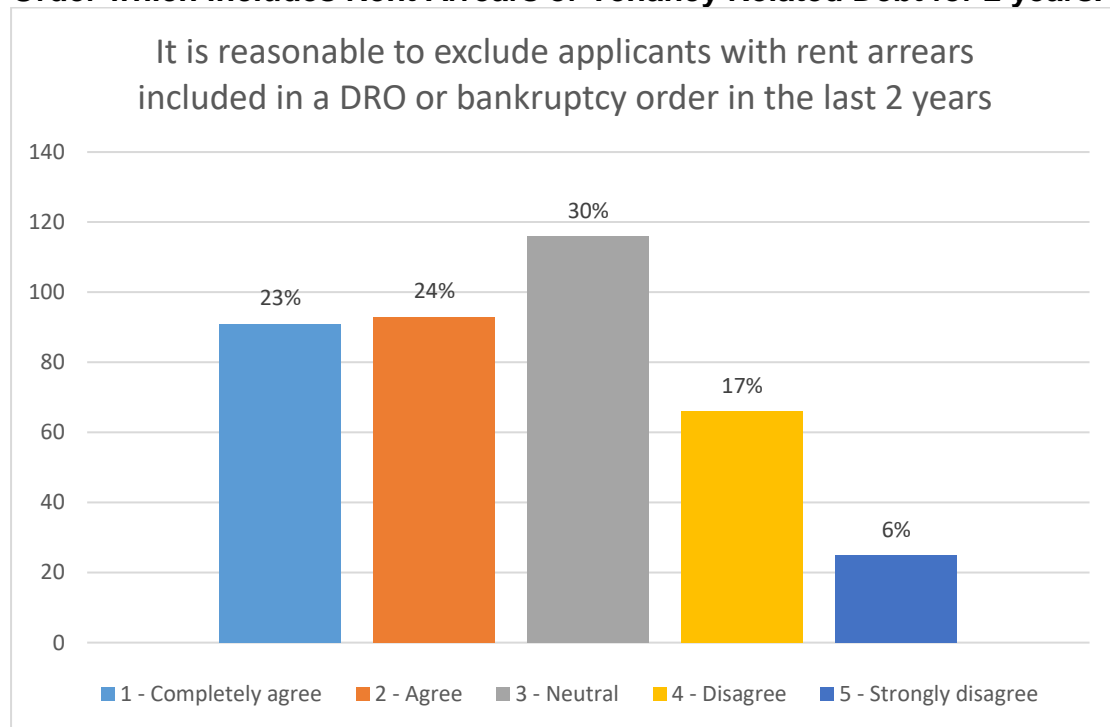
- **The limit of £500 is too low as it is less than one month's rent in the private sector.**

Management Board response – this will be considered as part of the next DHC Policy review.

- **Greater support is required for applicants with rent arrears and financial difficulties.**

Management Board response - significant levels of support are available to tenants who get into rent arrears. The DHC Operational Group will review the ways in which this support is signposted.

**2) It is reasonable to exclude applicants with rent arrears included in a Debt Relief Order (unless the debt has been paid in full) or Bankruptcy Order which includes Rent Arrears or Tenancy Related Debt for 2 years.**



57 of 391 respondents left a comment relating to this question.

77% of respondents agree with this statement or are neutral.

Common themes amongst the comments received:

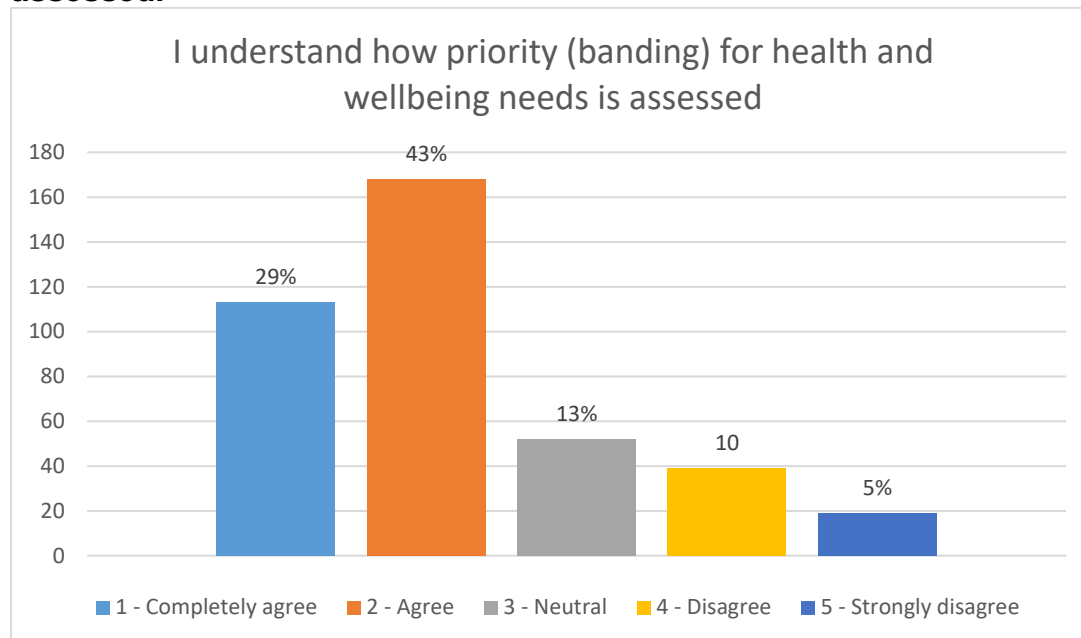
- **Individual circumstances should be taken into account.**

Management Board response – Applications are considered individually and exceptional and individual circumstances may be taken into account. Please see policy paragraphs 2.6.7 – 2.6.9.

Victims of domestic abuse who have been subject to controlling behaviour, and have accrued rent arrears as a result are exempt from this sanction.

## Section 4 – Health and wellbeing

### 1) I understand how priority (banding) for health and wellbeing needs is assessed.



67 of 391 respondents left a comment relating to this question.

15% of respondents advised that they do not understand how priority for health and wellbeing needs is assessed.

52% of comments provided were from respondents who advised that they do not understand how priority (banding) for health and wellbeing needs is assessed.

#### Common themes amongst the comments received:

- **Mental health issues are not given sufficient priority.**

Management Board response – the Health & Wellbeing Assessment Framework (please refer to policy paragraphs 3.20 – 3.20.2) covers a wide range of disabilities and health issues. The framework has been designed to ensure that there is parity in how the severity of physical and mental health issues are assessed. Priority is based upon the effects of the housing situation rather than the severity of the condition itself.

- **There is a lack of consistency in the way in which the H & W Framework is applied.**

Management Board response – The DHC partners periodically run workshops to promote consistency in the assessment of health and wellbeing priority and will continue to do so. Every attempt is made to

ensure that the Health & Wellbeing Assessment Framework is applied consistently. An appeal system is offered for every decision.

- **Health and wellbeing issues relating to housing disrepair and ASB should be taken into account.**

Management Board response - Our aim is to improve the standard of housing rather than allow properties to remain in a poor condition or ASB issues to continue. Tenants should work with landlords and where necessary local authority Environmental Health teams and the Police to address housing defects or ASB . The policy does allow for priority to be awarded for housing defects which cannot be rectified in a timely manner.

- **Some feel that the requirement for providing supporting evidence is too rigid.**

Management Board response – The award of all priority, including for health and wellbeing issues is evidence based. Local authorities may accept existing OT assessments, care plans, PIP confirmation letters etc. rather than requiring that professionals complete a Supporting Evidence form. Please see paragraph 41.19 of the DHC Procedures Manual.

## **2) Do you have any comments relating to the provision of supporting evidence?**

50 of 391 respondents provided a comment.

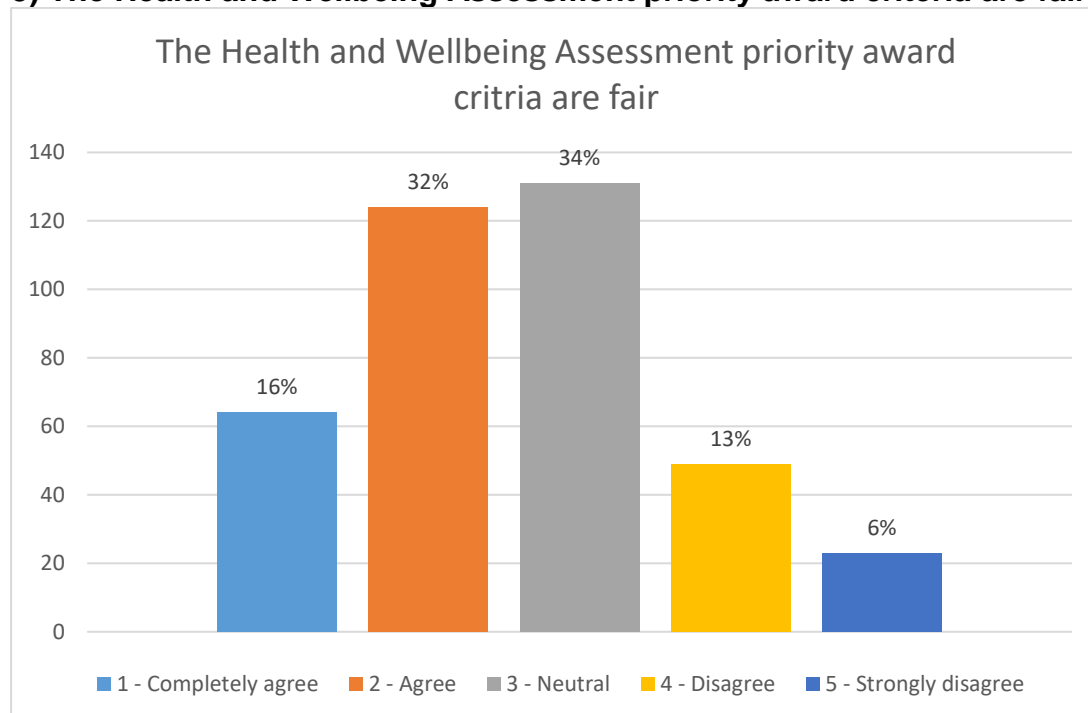
### Common themes amongst the comments received:

- **Some applicants have difficulties providing supporting medical evidence either from GPs or other medical professionals.**
- **Clarity is required around what types of evidence will be accepted.**

Management Board response – The award of all priority, including for health and wellbeing issues is evidence based. Local authorities may accept existing OT assessments, care plans, PIP confirmation letters etc. rather than requiring that professionals complete a Supporting Evidence form. Please see paragraph 41.19 of the DHC Procedures Manual.

Priority is based upon the effects of the housing situation rather than the severity of the condition itself.

### 3) The Health and Wellbeing Assessment priority award criteria are fair.



55 of 391 respondents left a comment relating to this question.

19% of applicants advised that they do not consider that the Health and Wellbeing Assessment priority award criteria are fair.

55% of the comments provided were from applicants who consider that the H & W award criteria are not fair.

#### Common themes amongst the comments received:

- **Decisions made with regard to H & W banding need to be explained clearly.**

Management Board response – All banding decisions should be explained clearly in relation to the policy. This feedback will be passed on to the DHC Operational Group to discuss and ensure that all decisions are fully explained.

- **The assessments do not consider wide enough criteria, issues such as disrepair should be taken into account.**

Management Board response - the Health & Wellbeing Assessment Framework (please refer to policy paragraphs 3.20 – 3.20.2) covers a wide range of disabilities and health issues. Priority is based upon the effects of the housing situation rather than the severity of the condition itself.

With regard to disrepair our aim is to improve the standard of housing rather than allow properties to remain in a poor condition for the next person to move in. Tenants should work with landlords and where

necessary local authority Environmental Health teams to address housing defects. The policy does allow for priority to be awarded for housing defects which cannot be rectified in a timely manner.

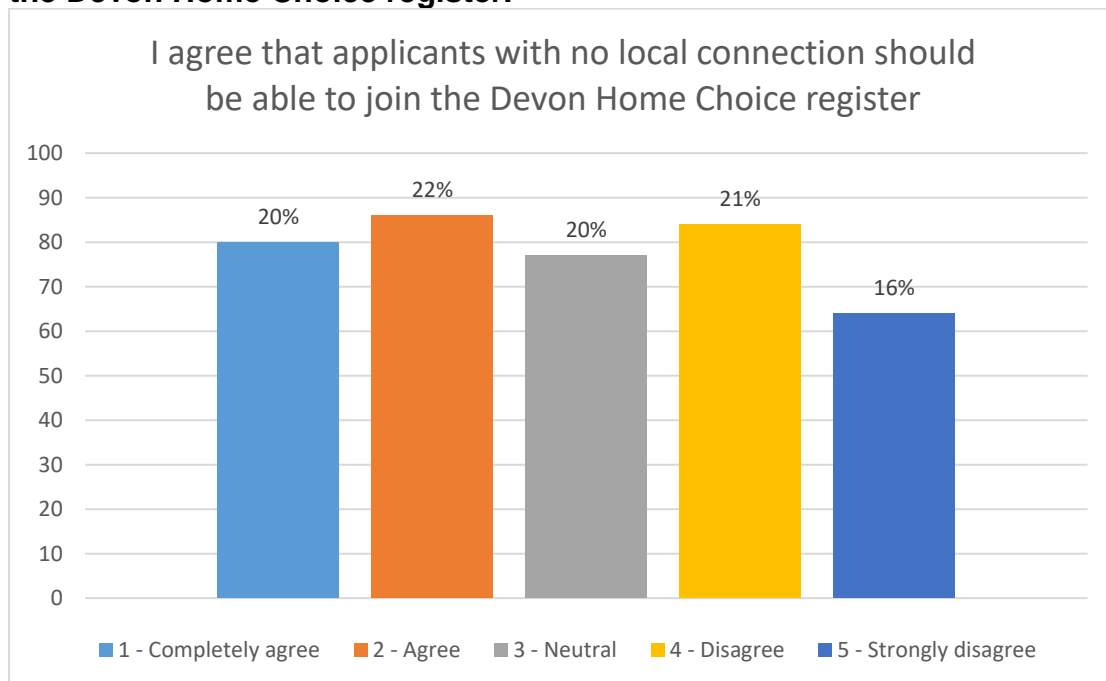
- **More consideration and priority should be given to mental health issues.**

Management Board response - the Health & Wellbeing Assessment Framework (please refer to policy paragraphs 3.20 – 3.20.2) has been designed to ensure that there is parity between how the severity physical and mental health issues are assessed. Priority is based upon the effects of the housing situation rather than the severity of the condition itself.

There is an appeals process for applicants who consider that they have been awarded the wrong band. Please see section 4.21 of the policy.

## **Section 5 – Local connection**

### **1) I agree that applicants with no local connection should be able to join the Devon Home Choice register.**



62 of 391 respondents left a comment relating to this question.

As can be seen from the chart above, this issue divides opinion almost equally.

Common themes amongst the comments received:

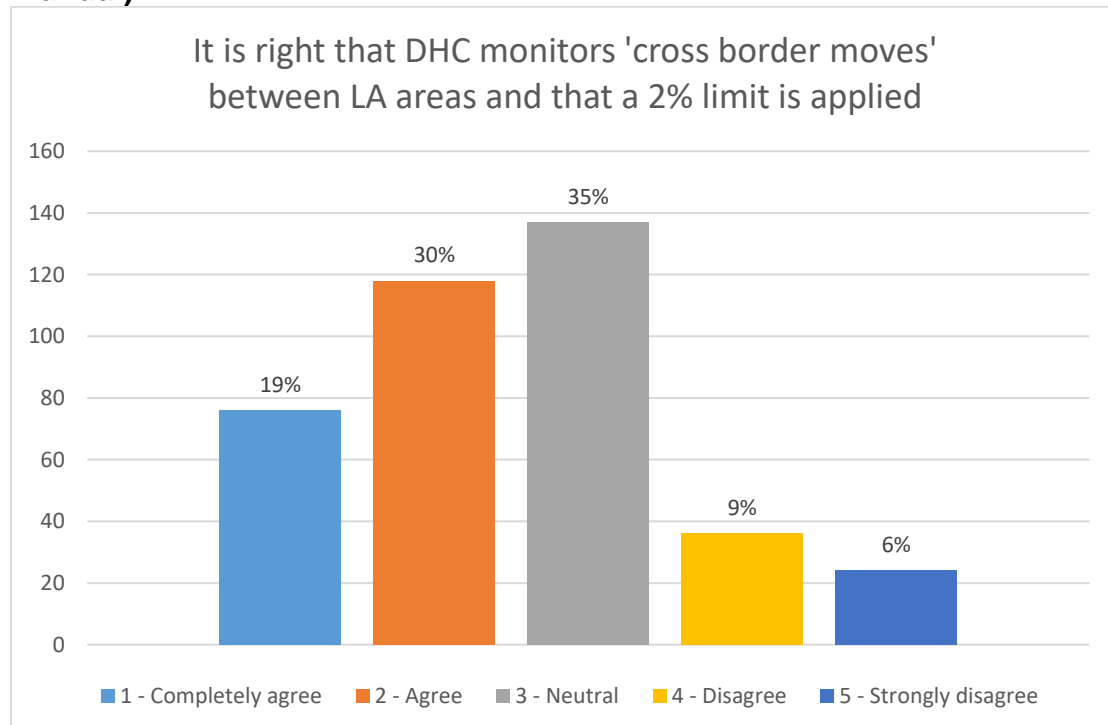
- **Many comments referenced needs to move for which there are already allowances in the policy such as escaping domestic abuse, moves for work**

Management Board response – Applicants who do not have a local connection to Devon through residence, work or close family members will have their band limited to Band D so are unlikely to be allocated higher demand properties. In accordance with legislation there are some exceptions to the limitation of banding, these include:

- People fleeing domestic abuse from another part of the country who would be at risk in the area(s) where they have a local connection.
- Members of the Armed Forces and former service personnel, where the application is made within five years of discharge.
- People who need to move to Devon to give or receive support where failure to do so would cause hardship.

See policy paragraphs 3.9 – 3.9.3 for more information.

**2) It is right that Devon Home Choice monitors 'cross border moves' between local authority areas and that a limit capped at 2% of lets for 'cross border moves' is reasonable (see section 64 of the procedures manual).**



44 of 391 respondents left a comment relating to this question.

85% of respondents are comfortable (agree/neutral) with the limit being applied.

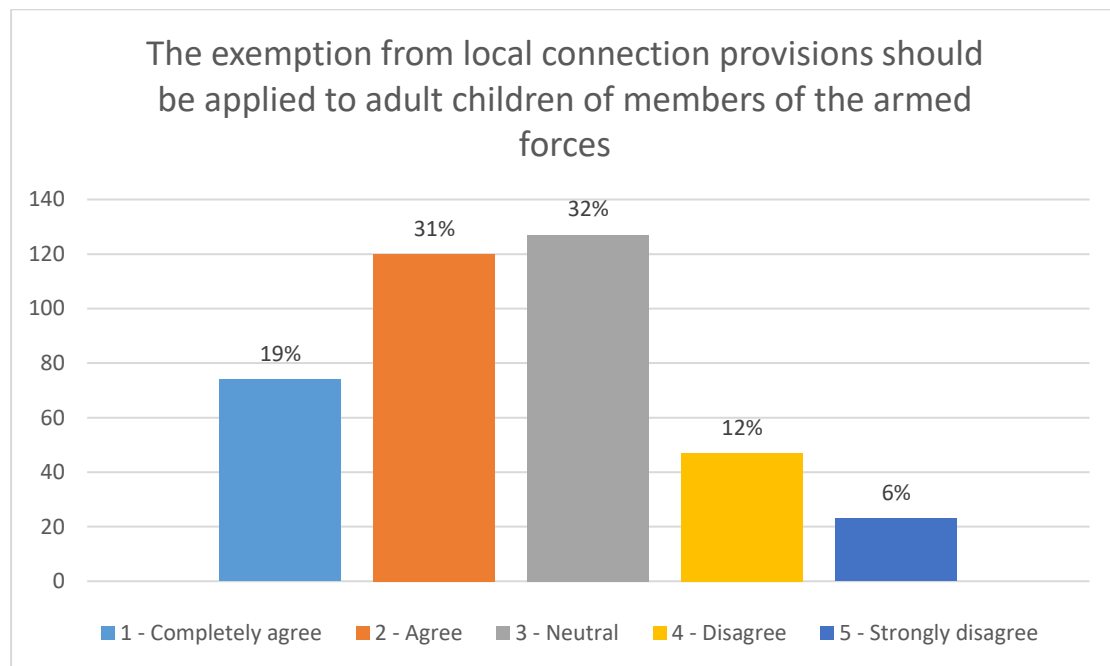
Common themes amongst the comments received:

- **Several respondents felt that the 2% limit was too low.**

Management Board response – The aim of DHC is to provide people seeking housing with choice and the ability to move within Devon. We do however need to ensure that moves between local authorities do not adversely impact on one or more local authority areas. The figures are monitored on a monthly basis to ensure that local connection restrictions are not in place unnecessarily.

**Section 6 – Armed Forces**

**1) The exemption from local connection provisions should also be applied to the adult children of members of the armed forces who are no longer able to stay in the family home.**



25 of 391 respondents left a comment relating to this question.

Common themes amongst the comments received:

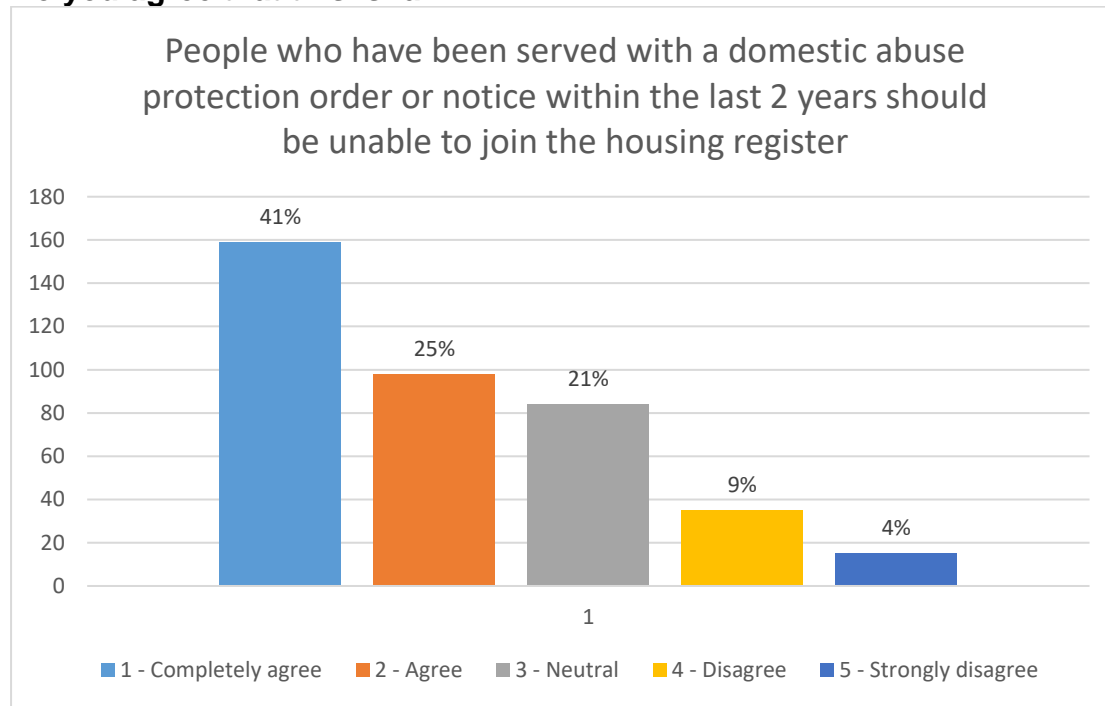
- **The majority of the comments (56%) came from respondents who disagree with the statement.**

Management Board response – The DHC Management Board is committed to complying with all legislation and the Armed Forces Covenant. The current policy is compliant and will be reviewed in line with any changes in legislation or guidance.



## Section 7 – Domestic Abuse

**1) People who have served with a domestic abuse protection notice or order in the last 2 years will not be eligible to join the housing register. Do you agree that this is fair?**



43 of 391 respondents left a comment relating to this question.

This statement received the joint highest percentage (41%) of 'Completely agree' responses.

Common themes amongst the comments received:

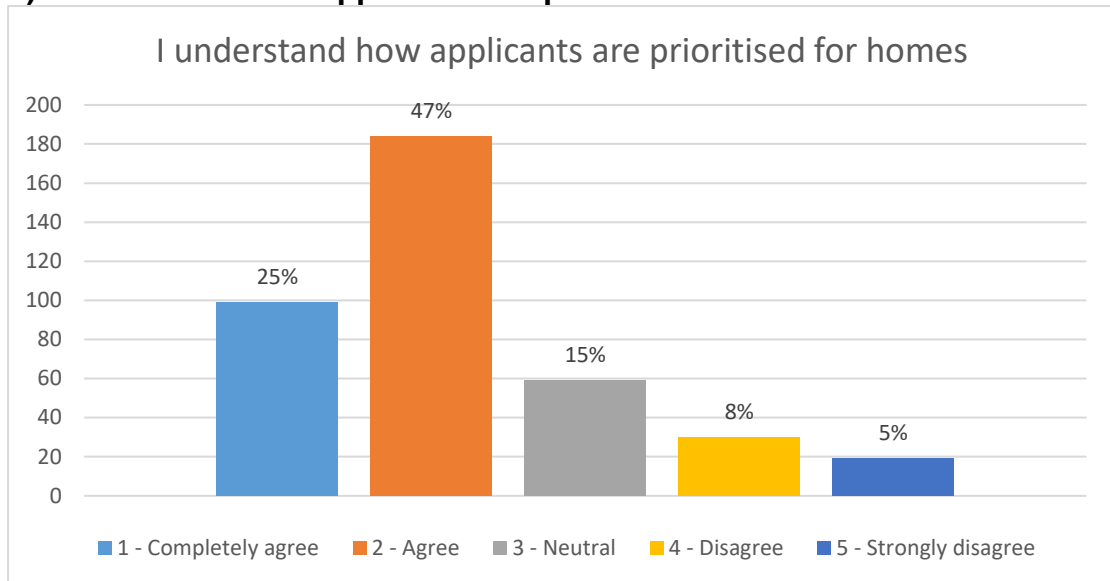
- **Despite the high proportion of 'Completely agree' responses many comments feel that there is a need to allow such applicants onto the housing register.**

Management Board response – The Localism Act 2011 provides local authorities with the power to determine for themselves what classes of persons are, or are not, persons qualifying to be allocated social housing in their areas.

The Devon local authorities do not set out to exclude certain types of people from the Devon Home Choice register. However we do seek to exclude certain types of behaviour. Where households are willing to address their behaviour their application will be reconsidered.

## **Section 8 – Advertising and allocation of homes**

### **1) I understand how applicants are prioritised for homes.**



33 of 391 respondents left a comment relating to this question.

13% of respondents advised that they do not understand how applicants are prioritised for homes.

#### Common themes amongst the comments received:

- **Concerns were raised with regard to the consistency and transparency of some allocations.**

Management Board response – DHC partner landlords do have their own allocations policies, these are available on the [Partners](#) page of the DHC website. In the vast majority of areas the individual landlord's policies will mirror that of Devon Home Choice but there may be some areas where there are differences. The final decision on the allocation will be made by the landlord. Landlords are accountable for their decision and can be approached in accordance with their own policy processes.

People with a need for an accessible or adapted home are prioritised for suitable homes wherever possible.

There may be occasions where properties are required for urgent management moves. That should be done only in exceptional circumstances and such moves are monitored by the Management Board.

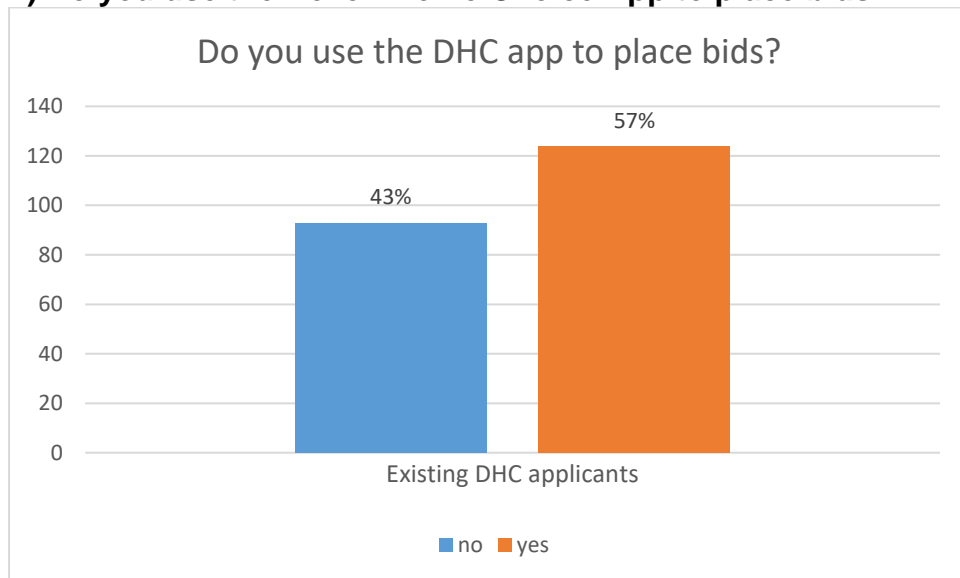
- **Some concerns were raised over the lack of and accuracy of information contained in adverts.**

Management Board response – Every effort is made to ensure that the details of adverts are accurate. There may be some cases, particularly due to the current situation with COVID-19, where a pre-void inspection has not been possible prior to the property being advertised and full up to date information on the property has not been available.

- **Some would prefer homes to be allocated from a waiting list rather than requiring bids to be placed.**

Management Board response – The Devon Home Choice Policy is compliant with a needs led approach as required by legislation and guidance. The Management Board believe that using a choice based lettings scheme will lead to more sustainable communities as tenants are given some choice over where they live. The use of a choice based system also provides a common scheme and transparent way for applicants to move across all 10 Devon local authority areas.

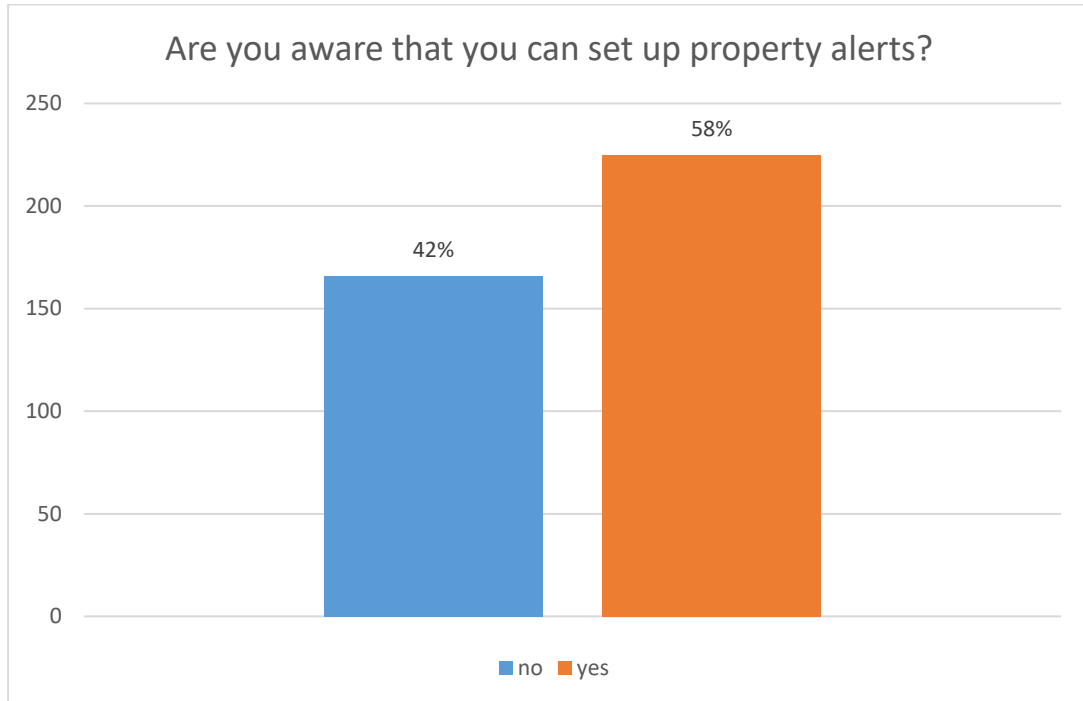
## 2) Do you use the Devon Home Choice App to place bids?



Both positive and negative comments were received with regard to the App.

Management Board response – Approximately one third of bids are placed via the app. The app can only be used to search and bid for homes so only people with an active application can log in. The feedback received on the app is generally positive. Where issues are reported we will work closely with the app provider to resolve the problem as quickly as possible.

**3) Are you aware that you can set up property alerts to send you an email when a property which might be suitable for you is being advertised?**

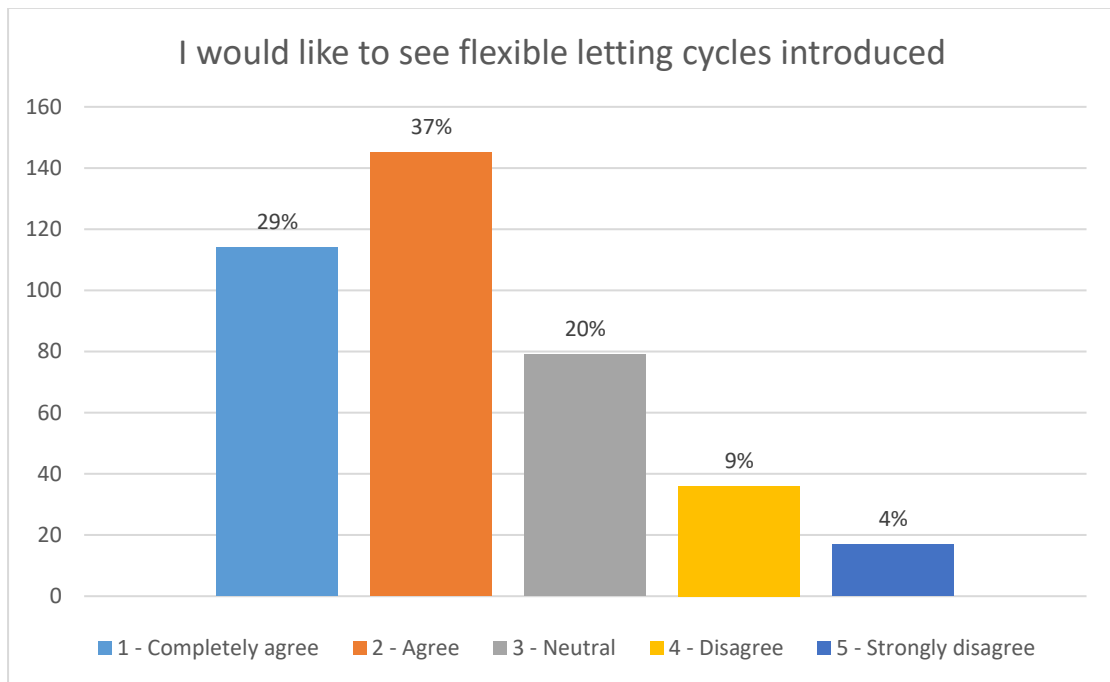


Common themes amongst the comments received:

- **Some applicants advised that they have set up alerts but do not receive emails.**

Management Board response – We are aware that there have been some issues with property alert emails being blocked by the system. We have worked closely with the system provider and the issue should now be resolved. Property alerts can be set up by logging into your account on the website.

**4) The Devon Home Choice Management Board may consider introducing flexible letting cycles. This may mean that some homes may be advertised whenever they become available and would not be advertised in accordance with the current advertising cycle (from midnight on Wednesday until midnight on the following Monday). This is something which I would like to see introduced.**



36 of 391 respondents left a comment relating to this question

86% of respondents are comfortable (agree or are neutral) with flexible letting cycles being introduced.

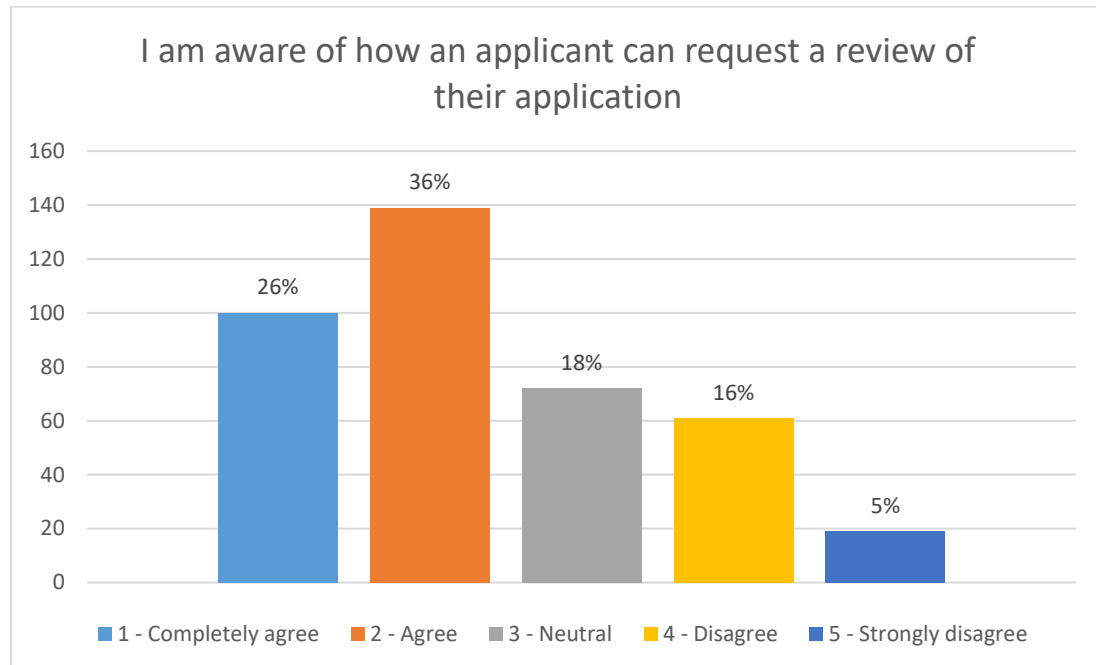
Common themes amongst the comments received:

- **Although 68% respondents agree with this proposal some of those did so whilst expressing concern over the practicalities and fairness of operating flexible letting cycles.**

Management Board response – Prior to any decision to introduce flexible letting cycles a pilot exercise would have to be conducted to ensure that there is sufficient support in place for applicants who need it and that no groups are disadvantaged.

## Section 9 - Reviews

### 1) I am aware of how an applicant can request a review of their application.



31 of 391 respondents left a comment relating to this question

23% of respondents advised that they were not aware that they could request a review of their application.

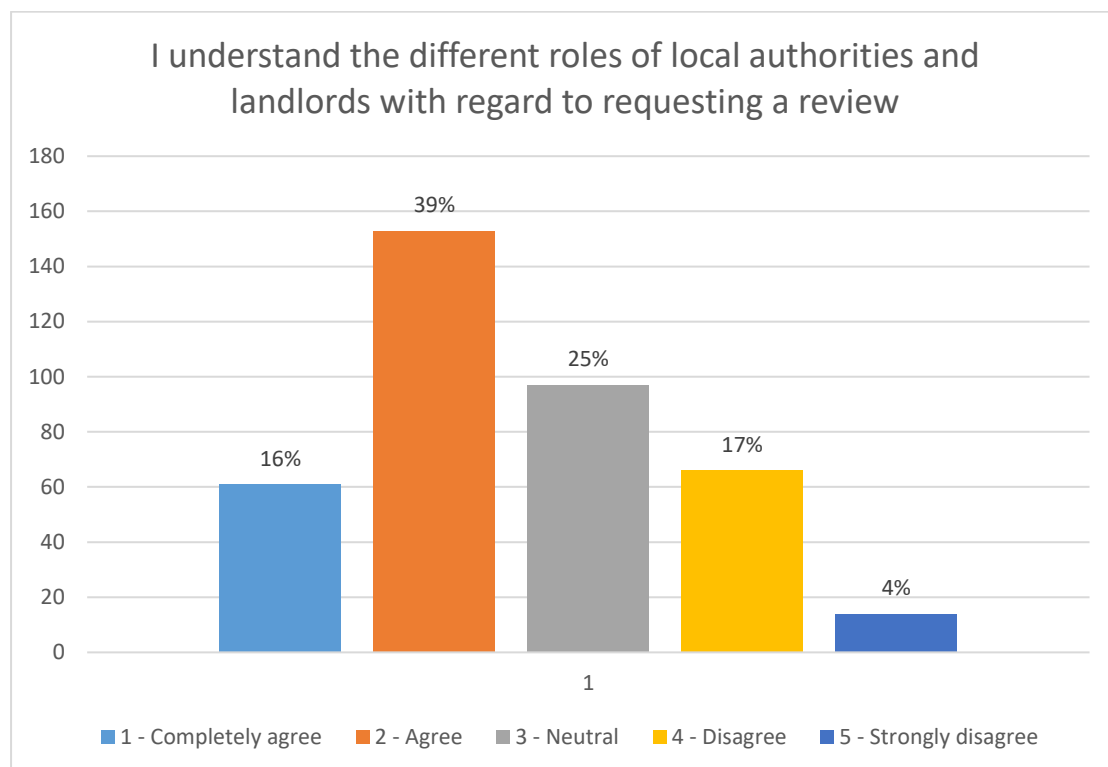
#### Common themes amongst the comments received:

- **Applicants need to be made more aware of their right to request an appeal and the process to do so.**

Management Board response – This feedback will be passed on to the DHC Operational Group to discuss and ensure that all decisions are fully explained and the right to request a review is highlighted.

Reviews should be completed and the outcomes confirmed within 56 days of the request being received. Reviews are carried out by a manager who was not involved in making the original decision.

**2) I understand the different roles of local authorities and landlords with regard to requesting a review.**



15 of 391 respondents left a comment relating to this question

55% of respondents advised that they understand the different roles of local authorities and landlords with regard to requesting a review.

Common themes amongst the comments received:

- **There is not a clear understanding of the different roles of local authorities and landlords.**

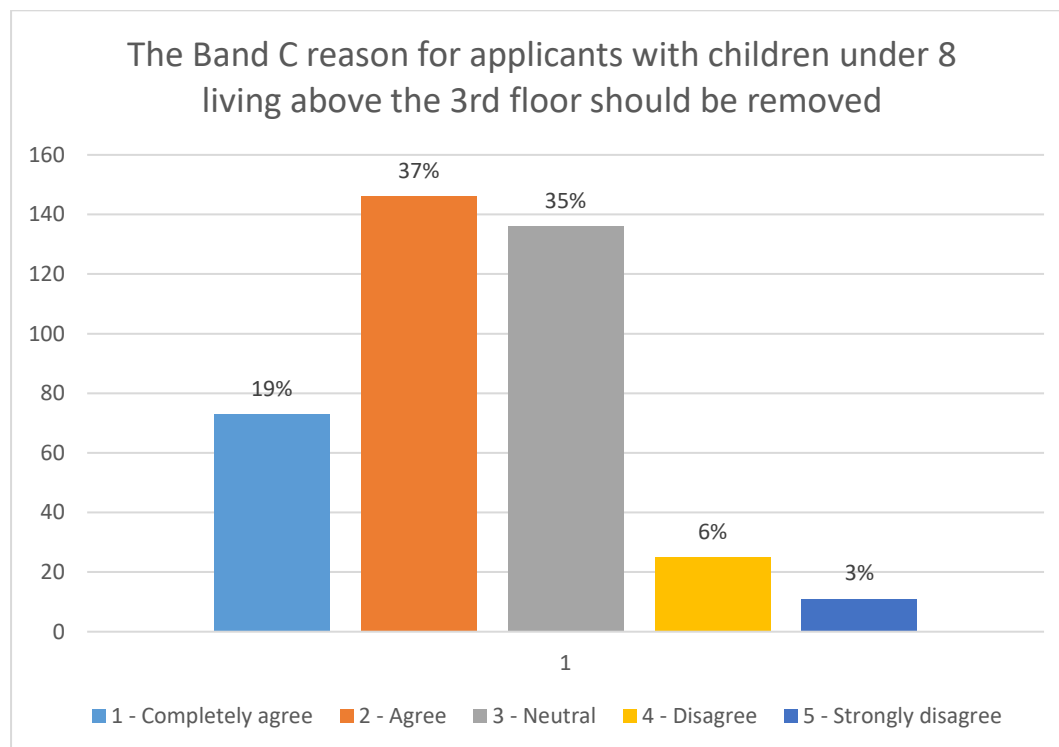
Management Board response - This feedback will be passed on to the DHC Operational Group to discuss and consider ways of clarifying these issues for applicants.

Requests for reviews relating to any aspect of the handling or assessment of an application should be direct to and handled by the relevant local authority.

Requests for reviews of a decision not to allocate a property for which the applicant has bid and has the highest priority and earliest band start date should be submitted to the landlord that has taken the decision.

## Section 10 – Proposed Change to the current policy

1) That the Band C for applicants with children under 8 living above the third floor (see section 3.6.3 of the policy) is not awarded in blocks of flats with lifts where improvement works have been carried out which include windows having been fitted with restrictors. This would enable landlords to allocate homes to applicants with young children in the future. Do you agree that the band reason should be removed in these circumstances?



26 of 391 respondents left a comment relating to this question

91% of respondent have no objection to the band reason being removed.

### Common themes amongst the comments received:

- **Some respondents raised safety and child welfare concerns.**
- **Others felt that allocating homes above the 3<sup>rd</sup> floor to children under 8 was in line with what is done in other areas and the private housing sector.**

Management Board response – There are currently only 15 applications on the register with only this reason. The Board agreed that this band reason should be removed from the policy but that any existing applications which have Band C for this reason only will retain their current band. This will increase the housing options available for families with young children. Where required landlords should carry out person-based risk assessments.



## **Section 11 – General**

**1) Do you have any comments with regard the changes which are currently being proposed and which are detailed in the proposed policy changes?**

19 of 391 respondents left a comment

Common themes amongst the comments received:

- **There is still not enough priority being given to people with mental health issues.**

Management Board response – the Health & Wellbeing Assessment Framework (please refer to policy paragraphs 3.20 – 3.20.2) covers a wide range of disabilities and health issues. The framework has been designed to ensure that there is parity in how the severity of physical and mental health issues are assessed. Priority is based upon the effects of the housing situation rather than the severity of the condition itself.

The DHC partners will include anonymised applications with mental health issues in the health and wellbeing assessment workshops to ensure that the Health & Wellbeing Assessment Framework is being applied correctly and consistently. An appeal system is offered for every decision.

**2) Are there any banding reasons which you consider to be unfair? If yes please provide details.**

99 of 391 respondents left a comment

Common themes amongst the comments received:

- **Some would like to see priority banding awarded for disrepair issues such as damp and mould.**

Management Board response - Our aim is to improve the standard of housing rather than allow properties to remain in a poor condition for the next person to move in. Tenants should work with landlords and where necessary local authority Environmental Health teams to address housing defects. The policy does allow for priority to be awarded for housing defects which cannot be rectified in a timely manner.

- **Allowing a band for affordability issues in private rented accommodation.**

Management Board response – Affordability does not fall into reasonable preference categories defined in the Housing Act 1996 so does not receive priority banding. Local authority Housing Options teams should be contacted in the first instance for advice and assistance and/or independent external advice agencies should be contacted in the first instance for advice and assistance if applicants are struggling with affordability issues.

- **Allowing bedroom need for both parents where there is joint custody.**

Management Board response – Normally only one parent will be allocated a bed need sufficient to accommodate their child(ren). This follows the precedent set down in Holmes-Moorehouse v Richmond. Applications are considered on a case by case basis but must be balanced against the availability of family sized homes. This policy is also aligned to that used for the calculation of Housing Benefit.

- **More consideration should be given to mental health issues.**

Management Board response – the Health & Wellbeing Assessment Framework (please refer to policy paragraphs 3.20 – 3.20.2) covers a wide range of disabilities and health issues. The framework has been designed to ensure that there is parity in how the severity physical and mental health issues are assessed. Priority is based upon the effects of the housing situation rather than the severity of the condition itself.

- **The band for rough sleepers should be higher than Band D.**

Management Board response - We use band D for rough sleepers, as legislation requires us to show 'reasonable preference' for anyone who is homeless and band D qualifies as a reasonable preference banding. Rough sleeping can be a complex issue and have many hidden reasons. All rough sleepers are able to get support from their local housing options team, who will be able to work to support a rough sleeper to move on into settled accommodation. This frequently enables a rough sleeper to be placed into a higher band, once their needs are fully understood and it can be demonstrated that they are tenancy ready.

**3) Are there any other areas of the Devon Home Choice Policy which you think should be reviewed? Where possible please refer to the specific section of the policy.**

74 of 391 respondents left a comment

Common themes amongst the comments received:

- **Allowing an extra bedroom need for older or disabled applicants.**

Management Board response – The policy does allow for the allocation of additional bedroom need where there is evidence to support it. In view of the lack of available social housing we need to ensure that the stock is used most effectively. We also need to tie in with Housing Benefit rules in order to ensure that tenancies are affordable.

- **Flexibility should be allowed to take into account individual circumstances**

Management Board response – all applications are considered individually and whilst the policy is required to be applied in order to ensure consistency flexibility is written in to all key areas of the policy and local authorities are able to depart from the policy to take into account exceptional circumstances.