

## Housing Allocations Policy – Consultation

This report contains a summary of recommendations following full public consultation. The consultation included a focus group with the Council's HRA tenant panel and a 10-week online consultation open to the public. The online consultation closed on 1 September, and in person drop-ins were held at all community hubs to assist those who wanted it to complete the form.

For the most part, consultation responses were positive and in agreement with the changes to the policy. There was a strong sentiment to prioritise Medway residents.

### 1. Impact of the consultation

The outcome of the consultation and changes to the policy as a result have no negative impact on the Diversity Impact Assessment or Risk assessment submitted with these papers.

### 2. Summary of public consultation

- There were 63 completed questionnaires
- 70% of respondents agree/strongly agree with the proposal to increase the residency criteria from 2 years to 3 years
- Respondents were asked whether they agree or disagree that the following households should be exempt from the residency criteria:
  - 70% agree/strongly agree that households fleeing domestic abuse or violence from another area should be exempt
  - 50% agree/strongly agree that households who live in Medway Council commissioned supported accommodation should be exempt
  - 59% agree/strongly agree that care leavers under the age of 25 should be exempt
  - 46% agree/strongly agree that households who are over the age of 60 should be exempt

- 34% agree/strongly agree that households moving to Medway from a refuge should be exempt
- 60% agree/strongly agree that certain members of the British Armed forces should be exempt
- 54% of respondents agree/strongly agree with the proposal to decrease the maximum household assets from £50,000 to £42,000
- 46% of respondents agree/strongly agree with the proposal to introduce maximum household incomes based on the bed size of the property
- Respondents were asked whether they agree or disagree with the following banding categories:
  - 77% agree/strongly agree with Band A
  - 65% agree/strongly agree with Band B
  - 41% agree/strongly agree with Band C
  - 63% agree/strongly agree with Band D
- 47% of respondents agree/strongly agree with the proposal to remove the inactive banding 'Band X'
- 59% of respondents agree/strongly agree with the proposal to remove the Transfer banding from the banding criteria

General comments about those who are exempt from the residency criteria	Our response
<i>Those fleeing domestic abuse</i>	
Some were concerned that people may falsely claim domestic abuse to gain access to social housing.	Medway Council takes fraud seriously and will always take steps to assess claims accurately, based on the information we are provided with
There should be a preference for local residents, rather than those from another borough. Some responses provided alternative solutions for people who are fleeing domestic abuse	Following recent changes in legislation, qualifying people in Section 160ZA of the Housing Act 1996 requires local authorities to enable those fleeing domestic abuse onto the housing register,

or violence which included reciprocal moves between local authorities, being supported into the private rented sector and being supported by the local authority area they are fleeing from.	<p>regardless of local connection. This means this exemption is required by law.</p> <p>For those who are fleeing domestic abuse, the Council recognises that it is not always safe or appropriate for someone to remain in the local authority they are fleeing from. If someone has also made a homeless application, they will be able to access other options to securing permanent housing, including help to access the private rented sector.</p>
<i>Those residing in Medway Council commissioned supported accommodation</i>	
Most comments related to the concern that we should be prioritising local residents over those moving from out of area.	<p>This exemption relates only to support services commissioned by Medway Council. In most cases, this will mean that the Council has identified a duty to assist this person with their care and housing needs. The Council will also have identified that the person is a Medway resident.</p> <p>In many cases, those in supported accommodation usually live in these short-term provisions for around 18-24 months. An increase in the residency criteria might mean that someone is unable to move on from a support service which could cause a bed-blocking situation for those who needed to access the service.</p>
Some comments suggested that the decision to exempt should be made individually, based on certain needs such as health.	<i>Those who are residing in a commissioned support service will likely have health needs or other multiple complex needs</i>
Comments advised that their opinion was that people who already have housing, shouldn't be afforded an exemption to the residency criteria.	<i>Most commissioned supported services are not long-term housing solutions and are there to help people to be able to live independently in the future. It is important to provide pathways to move out of supported services when someone is ready.</i>

Care leavers under the age of 25	
Medway residents or families should be prioritised over care leavers from outside of the area. Other comments questioned why a care leaver would receive any priority or social housing.	<p><i>Following recent changes in legislation, qualifying people in Section 160ZA of the Housing Act 1996 requires local authorities to enable all care leavers onto the housing register, regardless of local connection. This means this exemption is required by law.</i></p> <p><i>Medway Council recognises that those who have been in care have likely already experienced a lack of opportunities to access services, therefore it is important that they are afforded a priority on the housing register.</i></p>
Care leavers should be assisted to move into alternative, more supportive accommodation to learn life skills.	<i>Where appropriate options such as these are considered and often used.</i>
Households over 60	
The most common reason for this was believing that Medway residents should have a priority, regardless of someone's age.	<i>We will make clear within the policy that this exemption relates only to those who are awarded a banding to bid on Sheltered accommodation. This is a limited pool of properties but are often hard to let. Those who have been awarded a banding to bid on sheltered accommodation, but who have no other local connection are not able to bid on the wider pool of properties available to the rest of the register. It is worth noting that this is not a change to the previous policy.</i>
Why does the policy include age-based exemptions at all, 60 years old is under retirement age.	<i>This exemption relates only to those who are awarded a banding to bid on Sheltered accommodation. Sheltered accommodation eligibility often starts at 60 years old.</i>
Support should be based on specific needs (e.g. health, support networks), not just age	<i>As per our previous responses, these properties are often hard to let due to a reduced demand in comparison to the rest of the register. It is also considered best practice is to have a balanced community within Homes for Independent living schemes.</i>

Some comments assumed that older people are likely to already have housing or financial stability:	If someone is already a homeowner or has income/assets over the thresholds written into the policy, they would not be able to access the register.
Moving from a Refuge	<p>It is worth noting that when asked why they disagreed, a number of responses indicate that there was a misunderstanding that the exemption relates to refugees, not refuges available to people who are fleeing domestic abuse. We have provided responses that are relevant to those moving out of a Refuge.</p> <p>The allocations policy does not have an exemption for refugees.</p>
People who are fleeing domestic abuse should be housed within their own community or in their original borough.	<p>It is widely recognised that in many cases, it is not safe for people who are fleeing violence to remain in a familiar location.</p> <p>Alongside this, following recent changes in legislation, qualifying people in Section 160ZA of the Housing Act 1996 requires local authorities to enable those fleeing domestic abuse onto the housing register, regardless of local connection. This means this exemption is required by law.</p>
Certain members of the British armed forces	
People who have served in the British Armed forces already receive privileges, support and status that others are not afforded	The Allocation of Housing Regulations 2025 amend the rules on qualifying persons in section 160ZA of the Housing Act 1996, which means that UK Armed Forces Veterans will be exempt from rules which require a connection to a local area before accessing social housing. Therefore, this exemption is required by law.
General comments about any vulnerable people who may be disadvantaged by the increase in the residency criteria.	It is worth noting that a number of comments seemed to be addressing the exemption criteria. Due to the level of comments, we have provided responses to these comments in combination to the increase in the residency criteria.

<p>A number of comments expressed concern that the exemptions that lots of British and Medway residents would not have a chance of securing social housing with the exemptions proposed.</p>	<p>These exemptions have been in practice since at least the last review of the Allocations Policy in 2018, and we have not identified a disproportionate number of lets going to those who are non-Medway Residents.</p> <p>The only new exemptions are those who are residing in Medway Council Commissioned Supported Accommodation, and non-Medway Care Leavers. The impact on the register of applications from these groups of people has been assessed as minimal.</p> <p>By increasing the residency criteria, we are supporting Medway residents as this means those who have moved into the area recently, and who are not exempt from the criteria, will not be able to access the register.</p>
<p>People with long term ill health or special needs who require moving to be closer to family</p>	<p>Medway Council will always consider cases with exceptional circumstances, and the policy allows discretion to be applied on a case-by-case basis.</p>
<p>General comments about the proposal to decrease the maximum household assets from £50,000 to £42,000?</p>	
<p>Some respondents had concerns about the cost of living and financial pressures, stating that £42,000 was not high enough.</p> <p>In direct conflict, others stated that the threshold was not low enough, and that a higher threshold will increase the number of people on the register and therefore the demand for social housing.</p>	<p>A financial threshold is a complex decision. It is also worth noting that households who have assets below this threshold will also be required to have a housing need as set out in the policy to be able to bid on properties.</p> <p>Medway Council has reflected on these comments as well as the thresholds drafted and have made the decision to increase the maximum threshold for household assets to £63,000.</p>

	<p>This calculation was based on the inflation rate, as well as recognising that the asset threshold must be higher than the threshold set for maximum annual income.</p>
<p>This threshold could still negatively impact those who are vulnerable, citing the insecurity of the private sector or those who are fleeing domestic abuse but may be homeowners unable to access their assets as an example.</p>	<p>Medway Council agrees that there are cases in which this threshold could prevent someone from accessing safe accommodation.</p> <p>In exceptional circumstances, where all other legal routes are exhausted we will exclude those fleeing domestic abuse from the asset threshold.</p>
<p>Asset ownership does not always reflect housing need. An example of this was that for some people the assets could be someone's life savings or savings for a deposit. Others referenced large sums inheritance.</p>	<p>The allocations policy has been written to ensure that social housing can be allocated as fairly as possible, to those who need it most.</p> <p>We consider that those who have large sums of savings or inheritance are able to secure themselves somewhere to live.</p>
<p>General comments about the decision to introduce maximum household incomes based on the bed size need of the household</p>	
<p>Income or asset thresholds don't accurately reflect people's actual housing needs, emergency life events or financial pressures.</p>	<p>We agree that this is the case, and this is why we have adjusted our previous blanket policy of a £50k per year threshold, as this does not reflect household income for larger families.</p> <p>These are maximum thresholds, so households earning below these thresholds will be able to access the housing register.</p> <p>Due to the demand on housing stock, the housing register is not an emergency tool to resolve housing issues. There is no income</p>

	thresholds for households who are homeless or at risk of homelessness and need to make a homeless application.
Working individuals or families are unfairly penalised by the proposal.	<p>The allocations policy has been written to ensure that social housing can be allocated as fairly as possible, to those who need it most.</p> <p>We consider that those who have high and regular income will be in a position to secure themselves somewhere to live.</p> <p>We have increased the threshold for larger families to reflect our understanding that</p>
People earning above £50k per year should not be eligible for social housing	<p>Whilst we agree that those with a higher income will be in a position to secure themselves somewhere to live, we recognise that our previous blanket policy off £50k per year is unfair to families. We recognise that an income of £50k per year will provide more disposable income for a household without children, than for those with children in the household.</p>
Social Housing eligibility shouldn't only be about income, and personal circumstances should also be considered.	<p>The allocations policy has been written to ensure that social housing can be allocated as fairly as possible, to those who need it most.</p> <p>We consider that those who have high and regular income will be in a position to secure themselves somewhere to live.</p>
General comments about Band A	
It shouldn't matter why someone needs housing.	<p>Setting out a banding policy means that we can fairly assess and allocate a limited amount of social housing to households who need it the most.</p>
General comments about Band B	
A number of comments did not feel that households wanting to foster should do so within their current means.	<p>Enabling those who are approved foster carers a higher banding providers equal opportunities for all households to foster. This decision also supports our corporate parenting responsibilities.</p>



Care leavers should have a supported housing facility, and that being a care leaver should not be a priority over other households.	Where it is appropriate, supported housing for care leavers is a frequently used tool to provide someone with housing, however these are not permanent placements. Band B for Medway Care leavers means that Medway residents are prioritised.
Right to move should not be a priority banding	This is only for those who are already social housing tenants and are required to move to Medway in certain circumstances. This is not a new addition to the banding system, although previously it was band C. Historically only a minimal amount of applications for the housing register are awarded this.
General comments about Band C	
There was a large response to Non-Medway Care leavers receiving band C, and that they should not be on the register at all	<i>Following recent changes in legislation, qualifying people in Section 160ZA of the Housing Act 1996 requires local authorities to enable all care leavers onto the housing register, regardless of local connection.</i> Medway Care Leavers are given a higher banding than non-Medway Care Leavers.
General comments about Band D	
Everyone considered to have a housing need should get housing, and they should not be deprioritised.	Applicants awarded band D are still able to access housing on the register and frequently receive offers of accommodation.  The new allocations policy has been written to ensure that those with an emergency or urgent housing need are allocated housing quickly, whilst still addressing the needs of those with a less urgent need.
General comments about removing band X (Inactive register)	
Removing band X will unfairly exclude people who have a genuine housing need.	Applications are placed in band X when we have assessed that although a household might meet the criteria to join the register, they do not have an identified housing need.

	<p>We will be encouraging those who are in band X to let us know if they have had a change of circumstances since the decision on their case was made.</p> <p>If a Homechoice application is removed and circumstances change, households can re-apply whenever they need to.</p>
Band X could be misused by non-Medway residents	People in band X are not able to bid on properties, and this banding is being removed. Those in Band X will need to re-apply if their circumstances change.
General comments about removing the transfer banding	
This will mean having to use Mutual Exchange tools like HomeSwapper which does not work and can include fees.	<p>Mutual Exchange tools are more successful the more people who are registered.</p> <p>The requirements and expectations on the households tenancy (no rent arrears, property in good repair) are the same for the transfer banding and a Mutual Exchange.</p> <p>Fees are usually only applicable if your Landlord is not registered with HomeSwapper. Medway Council are a registered with HomeSwapper, therefore Medway Council tenants do not need to pay a fee.</p>
Sometimes transfers are needed due to serious issues like safety	<p>Those who have other housing needs will be assessed against the rest of the banding criteria and awarded the appropriate banding.</p> <p>The Council maintains that in exceptional circumstances discretion can be applied and a banding awarded.</p>