

REPORT TO CABINET

Open		Would any decisions proposed:			
Any especially affected Wards	Mandatory	Be entirely within Cabinet's powers to decide	NO		
		Need to be recommendations to Council	YES		
None		Is it a Key Decision	NO		
Lead Member: Cllr Rust E-mail: cllr.jo.rust@west-norfolk.gov.uk			Other Cabinet Members consulted:		
			Other Members consulted:		
Lead Officer: Andy King E-mail: andy.king@west-norfolk.gov.uk Direct Dial: 01553 616422			Other Officers consulted: Duncan Hall, Assistant Director of Regeneration, Housing & Place Nikki Patton, Housing Services Manager		
Financial Implications NO	Policy/ Personnel Implications NO	Statutory Implications YES	Equality Impact Assessment YES If YES: Full Assessment	Risk Management Implications NO	Environmental Considerations NO
If not for publication, the paragraph(s) of Schedule 12A of the 1972 Local Government Act considered to justify that is (are) paragraph(s)					

Date of meeting: 21 July 2025

REVISION OF HOMECHOICE POLICY FOR THE ALLOCATION OF SOCIAL HOUSING

Summary

The council's Housing Needs Service ('the service') manages HomeChoice – a register of households who are looking for social and/or affordable housing in the borough.

Households who are eligible to join the register are placed in different bands, depending on the urgency of their need, and in accordance with the HomeChoice Allocations Policy.

The service is proposing changes to how households are prioritised, because of:

- Changes in legislation.
- Changes in demand for social and affordable accommodation, which make it necessary to differentiate between households with certain levels of need.
- Changes in the borough's overall approach to homelessness, as reflected in its Homelessness and Rough Sleeping Strategy (adopted by Council in November 2024).
- Feedback from staff, customers, and internal/external partners regarding the fairness of aspects of the policy.

A draft of the new policy is attached. Changes are summarised in this report.

Recommendation

Cabinet Resolves:

To recommend that the revised HomeChoice Allocations Policy (with changes as set out in paragraph 1.3) is adopted by Full Council.

Recommendations to Full Council:

To adopt the HomeChoice Allocations Policy.

Reason for Decision

The new policy fulfils the council's legal responsibilities, aligns with the borough's Homelessness and Rough Sleeping Strategy and seeks to make the fairest use of a limited local resource.

1 Background

1.1 Introduction

Every Council which is a housing authority must publish a policy for determining the priorities and procedures to be followed in allocating social¹ housing in their area. In King's Lynn and West Norfolk, this process is managed by HomeChoice, part of the council's Housing Needs Service.

HomeChoice is an online Housing Register. The council and partners provide telephone and face-to-face support to people who may struggle to complete an online form.

The Social Housing Allocations Policy ('the policy') explains the rules HomeChoice will follow in maintaining a Housing Register and the allocating of social housing to housing applicants from the Housing Register.

The policy has been in place since 2004, with its last major revision in 2013. Since its inception, patterns of homelessness and housing need have changed significantly, and there have been changes to legislative and strategic priorities. The new policy seeks to address these changes.

1.2 Consultation measures and methods

The service collaborated with members of the council's Communications Team, other departments, and partners to ensure the needs and wishes of stakeholders were considered. 261 people contributed to the development of the policy, including 212 survey respondents and at least 99 people with current or former lived experience of homelessness.

¹ NB – references to "social" housing include accommodation let by registered providers of social housing on both social and affordable rents.

Senior members of the service developed the policy document, with oversight from the Housing Services Manager and regular discussions with the Cabinet Member for People and Communities.

Consultation events with stakeholders included:

- a drop-in session at the Purfleet Trust for people with lived experience of homelessness (face to face).
- A group session with seven residents and two staff members of a supported housing scheme run by Sanctuary Supported Living (face to face)².
- A drop-in session at Right Tracks, accommodation for homeless young people (face to face).
- A Teams briefing and discussion session for housing providers and members of the existing HomeChoice partnership, with all local housing providers invited (Teams).
- A section of the meeting of the Homelessness Strategy Implementation Partnership (in person and Teams).

The council conducted a public survey, promoting it through

- A press release
- Social media posts
- Banners and 'pinned posts' on council and HomeChoice websites
- Targeted emails to current HomeChoice users
- Direct promotion to people with lived experience of homelessness, through partner agencies such as Shelter³, the Purfleet Trust and housing providers (word of mouth, one-to-one meetings, posters).

The survey questions can be found at the end of the report. Note that the survey excluded areas of change that the service *had* to introduce because of legislation. Key points of note:

- The survey was successful in canvassing the opinions of people with lived experience of homelessness (43% of respondents) and people with long-term physical and mental health conditions and disabilities (33%).
- The survey also covered a wide spread of ages, though responses were skewed towards female respondents (73%).
- The changes were supported by most respondents for six out of the seven changes.
- For the other change ("Remove priority for people in employment"), 103 respondents voted to keep things as they are now, with 80 respondents voting to make the change and 29 being unsure. However, this change was strongly supported by people with lived experience (during a group session) and was either supported or unopposed by members of the Homelessness Strategy

² This session was particularly useful for shaping the final policy document. Whilst the policy retains change six (supported accommodation), the service will use feedback to deliver it fairly – with residents retaining the opportunity to obtain a high banding, based on their circumstances.

³ We received positive feedback from Shelter relating to the survey: "found it very well explained and easy to follow – congratulations to whoever put that together."

Implementation Group – a group of senior staff members from organisations with a key role in preventing and relieving homelessness in King’s Lynn and West Norfolk.

1.3 Key areas of change

The table below sets out the key areas of change within the new policy:

Current policy	Revised policy	Rationale
1. There are currently four allocation bands: low, medium, high and emergency	A fifth band – no priority – will be added to the existing four bands	Fairness and strategy: Presently, some households on the register are “adequately housed” – they have a desire to move but no need to do so. Individuals in this band are categorized alongside those who have some welfare or medical needs. This change would mean people who do have a housing need, even if it is low, will be in a better place than people who do not have a housing need.
2. Every 10 th family-type vacancy is advertised with preference given to applicants in the High and Medium housing need bands that are working	This preference will be removed.	Fairness: The current policy was introduced with the (good) intention of incentivising work amongst people living in and seeking work. However, it fails to recognise that residents may be unable to work because of disability, because they have caring responsibilities, or for other reasons. This change would mean that people who are unable to work are no worse off on the housing register than those who can.
3. Homeless prevention cases to be placed in low band	Will remain in low band but above those who are adequately housed	Fairness and legislation: The service owes a legal duty – a “prevention duty” – to certain people who are at risk of homelessness. The law requires the service to award some priority to people owed a prevention duty. Note that some authorities award a higher banding for those owed a prevention duty, but this can sometimes result in delays in rehousing people who are actually homeless (because those at risk are prioritised above them).
4. Welfare and medical needs are assessed separately.	Welfare and medical needs will be considered together	Fairness: Putting welfare and medical priorities together will mean the service can give a wider range of priority on these grounds and means the service can be more flexible about giving priority according to how urgent someone’s overall need is, not just one or the other.
5. Applicants with children lacking a bedroom or in a first floor flat with a child under 12 or a flat	Applicants with children lacking a bedroom will remain in medium priority. Applicants in a first	Fairness: Living in a first-floor flat or not having a garden not ideal for some people with children, but currently they have the same priority on the housing register as people who are overcrowded. The plan is to give such households some priority, but people who are

with no garden are all given medium priority	floor flat with a child under 12 or a flat with no garden will be given low priority	overcrowded will have higher priority, due to the greater impact on most households of overcrowding.
6. Applicants in supported hostel accommodation given high band when ready to move on	High band to be retained if supported accommodation residents can demonstrate their only move-on option is through social housing	Fairness and Strategy: Currently, all hostel residents who are ready for move on are automatically placed into a high band, regardless of their need for social housing. Conversely, all residents of shared accommodation (HMOs) are placed on medium band unless there are specific circumstances that warrant a higher banding. The amendment seeks to redress this balance and remove the potential incentive for individuals to access hostel accommodation that they may not need. This in turn will encourage hostel providers to explore a wider range of options for people entering hostel accommodation, whilst acknowledging that many residents will require social housing as their only realistic move on option. The process will be handled sensitively and will be developed alongside people with lived experience of homelessness. Hostel residents will remain high priority unless there is a clear indication that they do not need social housing to move on sustainably.
7. Current serving members and veterans of the regular armed forces are considered to have local connection for 5 years after leaving the military	Current serving members and veterans of the regular armed forces are considered to have local connection regardless of the length of time since they left the military.	Legislation: The change is being made to adhere with legal requirements. The rules also apply to other members of the armed forces community such as some bereaved spouses and former partners of Service personnel. The change is in line with the council's commitments to the Armed Forces Covenant.

Additionally, the new policy formalises interim arrangements made to support care leavers under Section 23C of the Children Act 1989, and under the council's commitments under the Care Leavers Covenant. In brief, young people leaving care anywhere in Norfolk will have a local connection to the borough. They will be awarded a high band, subject to conditions outlined in the policy.

1.4 Implementation

If adopted, the service will implement the new policy in September 2025, with existing households re-assessed and re-banded where appropriate. The service will inform all households of the impact of the new policy on their banding.

NOTE: the service will also revise the HomeChoice pages of the council's website and introduce an "in-brief" guide to completing applications, as well as details of where to go if applicants need help with the form.

2 Options Considered

Alternative options included:

- **Not making changes to the policy:** in doing so, the service would leave itself open to legal challenge and would face additional challenges in terms of preventing homelessness and tackling rough sleeping. The proposed changes would put the service in the strongest possible position as it prepares to navigate Local Government Reorganisation (LGR).
- **Making much more widespread changes:** there were changes that were omitted from the policy (such as enabling some residents of bordering districts to join the register). This was because the cost of administration would outweigh the benefits of the change, particularly given that district boundaries will change post-LGR.
- **Adopting all changes except “Remove priority for people in employment”:** this would bring the changes in line with the results of an online survey. This change was discussed in detail by members of the council’s Corporate Equalities Working Group, with the recommendation that the change is adopted. Further details of this discussion can be found in section 9 of the full Equality Impact Assessment.

The new policy fulfils the council's legal responsibilities, aligns with the borough's Homelessness and Rough Sleeping Strategy, and seeks to make the fairest use of a limited local resource – but it also seeks to minimise the disruption to council staff and customers through its implementation.

3 Policy Implications

The recommendation comprises a change to the council’s social housing allocation policy, as set out above.

4 Financial Implications

There are no direct financial implications for making this change. However, the change will require 200-250 hours of council officer time to manually review and amend applicants’ banding.

5 Personnel Implications

As above – no direct personnel implications.

6 Environmental Considerations

None

7 Statutory Considerations

Housing authorities are required by the Housing Act 1996 s166A (as amended by the Homelessness Act (1996) and the Localism Act (2011) to have an allocation scheme for determining the priorities and defining the procedures to be followed in allocating affordable housing accommodation.

The Allocation Policy sets out who can access the housing register and how accommodation is allocated in the borough, considering reasonable preference criteria laid out in legislation.

Further information on this can be found at www.gov.uk/guidance/allocation-of-accommodation-guidance-for-local-authorities/chapter-4-framing-an-allocation-scheme

This policy has also had regard to the following (this list is not exclusive):

- Allocation of accommodation: guidance for local housing authorities in England
- The Public Sector Equalities Duty
- Section 17 of the Crime and Disorder Act
- Borough Council of King's Lynn & West Norfolk's Homelessness & Rough Sleeping Strategy.

8 Equality Impact Assessment (EIA)

A pre-screening report and a full EIA are attached below this report.

9 Risk Management Implications

As outlined above, the proposal reduces risk to the council and its customers by creating an allocation policy that is:

- **Fairer:** reducing the risk of complaints and reputational damage (as well as reducing the cost arising from MPs' and members' enquiries).
- **More strategic:** improving the prospects of achieving the aims of the borough's [Homelessness and Rough Sleeping Strategy, Ending Homelessness, Person by Person.](#)
- **In line with legislation and guidance:** reducing the risk of legal challenge to the decisions made by officers:

Known risks include:

Risk	Mitigation
Enquiries/complaints generated by individuals' change in banding	Consultation work at pre-implementation stage to ensure that those on the register are aware of the changes and have an opportunity to express their concerns / suggest alternatives
Lack of buy-in from partner landlords – risk that landlords	Consultation work at pre-implementation stage to ensure that partners are aligned with the changes and continue to adopt them. Ongoing relationship management between the service and partners.

could pull out of partnership agreement	
Backlog in 'business as usual' enquiries because of processing changes.	The change has been timed to coincide with the overlap between one senior member of staff joining the team and another retiring – thus increasing the resource available. The service could also draft in help from elsewhere in the team or recruit staff temporarily, using ringfenced Homelessness Prevention Grant monies.
"Silted" of hostel system (and increase in temporary accommodation if people are "stuck" on medium band)	Introduction of Supported Accommodation Panel to ensure people are not placed into hostel accommodation inappropriately. SHPS service commissioned to help people access private sector housing. Fair and well-managed gateway to preserve high band for people who need it.
The work is carried out, but has to be re-done post-LGR (once local authority boundaries merge)	Strong work at development stage to ensure the service's policy is in the best possible state and is thus adopted as good practice once local housing registers are merged.

10 Declarations of Interest / Dispensations Granted

There are no declarations of interest.

11 Background Papers

- Draft Allocations Policy
- Housing Allocations Survey – Spring 2025 – questions
- Housing Allocations Survey – Spring 2025 – results
- Equality Impact Assessment – full

Stage 1 - Pre-Screening Equality Impact Assessment

For equalities profile information please visit [Norfolk Insight - Demographics and Statistics - Data Observatory](#)

Name of policy/service/function	HomeChoice Allocations Policy			
Is this a new or existing policy/service/function? <i>(tick as appropriate)</i>	New		Existing	Yes
Brief summary/description of the main aims of the policy/service/function being screened. Please state if this policy/service is rigidly constrained by statutory obligations and identify relevant legislation.	Changes to the Allocations Policy, summarized as below: • Increase in number of bandings from 4 to 5 • Removal of priority for every 10th vacancy for those in employment • Introduction of “no priority” band so that people owed a homelessness prevention duty have greater priority over those adequately housed • Amalgamation of welfare and medical criteria to give greater flexibility for people with both welfare and medical grounds for priority • Reduction in banding from medium to low for people with children under 12 who either (a) lack a garden or (b) live above the ground floor • Reduction in banding from high to medium for people in supported hostel accommodation who would be able to access Private Sector accommodation when moving on. (Retention of high band for all others ready to move on from hostel accommodation) • Removal of time limit for joining the register for armed forces veterans (and their spouses / ex-spouses) • Confirmation of high band for care leavers (previously an interim arrangement)			
Who has been consulted as part of the development of the policy/service/function? – new only <i>(identify stakeholders consulted with)</i>	• Public – via online and paper survey • Partners: • HomeChoice partner landlords • Members of Homelessness Strategy Implementation Group • People with lived experience of homelessness: • Purfleet Trust service users • Sanctuary Supported Living service users • Right Tracks (Benjamin Foundation) service users • Internal partners – senior members of council's housing options service.			
Question	Answer			
1. Is there any reason to believe that the policy/service/function could have a specific impact on people from one or more of the following groups, for example, because they		Positive	Negative	Neutral
				Unsure

have particular needs, experiences, issues or priorities or in terms of ability to access the service? Please tick the relevant box for each group. NB. Equality neutral means no negative impact on any group. <i>If potential adverse impacts are identified, then a full Equality Impact Assessment (Stage 2) will be required.</i> <i>*For more information on health inequalities please visit The King's Fund</i>	Age			X	
	Disability	X			
	Sex			X	
	Gender Re-assignment			X	
	Marriage/civil partnership			X	
	Pregnancy & maternity				X
	Race			X	
	Religion or belief			X	
	Sexual orientation			X	
	Armed forces community	X			
	Care leavers	X			
	Health inequalities*	X			
	Other (caring responsibilities)				X

Please provide a brief explanation of the answers above:

Positive impacts on:

- People with disabilities – who are more likely to have combined welfare and medical grounds for moving
- Members of the armed forces community – whose local connection rights have been extended
- Care leavers – confirming interim arrangements to prioritise care leavers for social housing
- Health inequalities – particularly those who are more likely to have combined welfare and medical grounds for moving. But also: providing fairer access to social housing, which is a key determinant of health

I have ticked unsure for “pregnancy and maternity” and “caring responsibilities” because of the reclassification from medium to low band for households with children living in a first floor flat or above. Whilst this may have a negative impact on some households, we expect the overall impact to be positive – accounting for the impact on people who are in overcrowded conditions or who have significant welfare or medical needs for accessing social housing.

Question	Answer	Comments
2. Is the proposed policy/service likely to affect relations between certain equality communities or to damage relations between the equality communities and the Council, for example because it is seen as favouring a particular community or denying opportunities to another?	No	I have answered no, but the allocation of social housing can be a sensitive subject. Whilst every effort has been made to develop a policy that is fair and transparent (and that challenges perceptions about social housing allocations), there is a risk that the policy may be perceived differently by customers and partners.
3. Could this policy/service be perceived as impacting on communities differently?	No	No, but as above

4. Are any impacts identified above minor and if so, can these be eliminated or reduced by minor actions? If yes, please agree actions with a member of the Corporate Equalities Working Group and list agreed actions in the comments section	Yes / No	Actions:	
If 'yes' to questions 2 - 4 a full impact assessment will be required unless comments are provided to explain why this is not felt necessary: Full EQIA required, as discussed with Charlotte Marriott 12 June 2025 Decision agreed by EWG member:12 June 2025.....		Actions agreed by EWG member:	
5. Is the policy/service specifically designed to tackle evidence of disadvantage or potential discrimination?	Yes	Please provide brief summary: The policy aims to allocate social housing in the fairest way, accounting for the needs of applicants.	
Assessment completed by: Name	Andy King		
Job title	Senior Housing Manager		
Date completed	12 June 2025		
Reviewed by EWG member	Charlotte Marriott	Date	12 June 2025

✓ Please tick to confirm completed EIA Pre-screening Form has been shared with Corporate Policy (corporate.policy@west-norfolk.gov.uk)