

## ALLOCATIONS POLICY REVIEW 2023/24 – CONSULTATION OUTCOMES

## Do you support the introduction of the revised Allocations Policy?

Response	Number	%
Yes	158	87.29%
No	23	12.71%
<b>Total</b>	<b>181</b>	<b>100%</b>

## Did you find the revised Allocations Policy easy to read and understand?

Response	Number	%
Yes	162	88.04%
No	22	11.96%
<b>Total</b>	<b>184</b>	<b>100%</b>

## Is there a section that you would like to see reworded?

Response	Number	%
Yes	13	7.5%
No	160	92.5%
<b>Total</b>	<b>172</b>	<b>100%</b>

What would you like to see reworded?	Response to suggestion
More points for downsizing scheme	The policy review has awarded points for downsizing. Modelling of the housing list indicates the point levels would be suffice for applicants to be reached for an offer of housing.
All of it, it's not in plain English or in layman's terms	Noted. The Council also offers an easy read version of the policy and an explanatory leaflet both of which use plain language.

do not give key workers extra points you discriminate against non-keyworkers	The purpose of key worker points is to provide a short term housing solution, enabling the person to take up employment and provide a skill needed in Moray whilst they search for alternative housing solutions.
The section on transfer applicants being awarded 250 points for moving to smaller housing was unclear. From reading the paragraph, it would appear that this applies to tenants who have volunteered to downsize, but not to those who have not chosen to downsize?	The award of 250 points (per bedroom under occupied) may be awarded to those who are under occupying on the transfer list. Not all of these applicants will be on the Downsizing Scheme (not all will be eligible). The award of Downsizing Scheme points is in addition to under occupancy points and aims to ensure that those on the Scheme are reached for an offer soonest and free up larger housing which is in great demand.
Social housing is not for life and just on loan to help	Scottish secure tenancies can only be ended in specific circumstances. This provides tenants with security of tenure for as long as they want it, unless any of the specific circumstances, set out in legislation, apply.
More points for people in overcrowded houses	It is anticipated that generating stock turnover via the award of points to those who under occupy their homes and downsizing, will free up larger homes which will be awarded to those living in overcrowded housing.

**Is there something that we've missed from the revised Allocations Policy that you think should be included?**

Response	Number	%
Yes	47	27.17%
No	128	73.99%
<b>Total</b>	<b>17</b>	<b>100%</b>

What do you think should be included in the policy?	Response to suggestion
Local residents should be given more priority than anyone else coming into the area.	The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances
I think people with children should be awarded extra points to find suitable accommodation faster.	The Allocations Policy would not award points solely for this reason. The award of points would depend on the individual applicant's circumstances and would reflect their level of housing need.

## APPENDIX I

<p>Introducing known criminals and known drug users in the heart of communities that otherwise did not have before is a key part missing. There are many examples across Moray where these individuals are continually moved from community to community bringing many issues. Not only that, it is the continual damage of council properties in the housing stock, costing tens of thousands to correct. This needs to be captured in policy to ensure that the law abiding majority in the moray area are protected from these people. Key amendments to the housing allocation policy can take cognisance of this.</p>	<p>Where we have evidence of tenancy related antisocial behaviour (through either eviction or the granting of an antisocial behaviour order) we may suspend the application for up to 12 months. If clear evidence is given showing that there has been a change in behaviour, for a minimum period of three months, the suspension may be lifted. Other policies may also be relevant. For example Rechargeable Repairs Policy, Eviction Policy and Homelessness Policy.</p>
<p>Allocation of points for length of time on waiting list.</p>	<p>The Allocations Policy uses criteria intended to reflect a person's housing needs. Time on a waiting list is not considered to reflect a person's housing need and therefore has not been included as a determining factor.</p>
<p>Local people should be awarded points to get housed much sooner than incoming tenants, despite the circumstances. Private rents are so expensive and local people are unable to access council housing</p>	<p>The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances</p>
<p>More points allocated to people with health reasons needing moved.</p>	<p>Such instances would be assessed under the Functional Housing Assessment and points levels would be dependent on the individual circumstances and level of evidenced housing need.</p>
<p>I think the most important point is that tenants residing in properties which are especially built for very disabled people should give up that property on the death of the disabled partner so that very disabled tenants trying to survive in one room because nothing can make their lives ok, i.e. adoptions etc should have the chance of moving into a specialist designed unit which has been vacated by a healthy person after death of their disabled partner...these specialist designed homes are vital but so many tenants would refuse to move as the en suite is luxury. I think there should be a clause which the Council add that these properties are tenants by those whose lives are rubbish due</p>	<p>Outwith the scope of the policy, however the Council already has a process in place for such scenarios (in accordance with housing law).</p>

## APPENDIX I

to inappropriate properties while waiting for suitable disabled properties which could take forever..	
Again, a need to introduce reassessment of tenants needs every 5 years to ensure housing remains appropriate and to help eradicate under occupancy. Peoples circumstances change all the time, so needs should be reassessed regularly to ensure housing remains allocated to those most in need. It's unfair that someone who was, at one point, a parent of 2 young children with another on the way and not working, remains in a large family home with only one child and a joint income of over £100,000 - this is a family I know of in social housing!	The review cannot comment on individual cases. However, it should be noted that the Council must comply with legislative requirements. There are only specific instances when the Council can take action to recover property. Under occupation is not included within the parameters of housing law. Social landlords can give greater priority to these tenants if they want to move. This is a voluntary choice, made by the applicant.
Yes, people with a disability that have children with a disability should have priority over other tenants with disability equipment they need and storage	Such instances would be assessed under the Functional Housing Assessment and would be dependent on the individual circumstances and level of evidenced housing need.
Difficulty within homes not being suitable for those with mobility problems and chronic illness(es)	Such instances would be assessed under the Functional Housing Assessment and would be dependent on the individual circumstances and level of evidenced housing need.
I think tenants who look after their homes should be offered new build allocation in new developments and those who aren't working get those houses vacated by those who have stepped up to new builds.	New build properties are let in accordance with the <u>Local Lettings Plan</u> which aims to ensure that the Council makes best use of its housing stock and help sustain communities.
Workers should score higher	The policy will assess an individual's circumstances to determine their level of housing need. Generic employment is not a factor.
More points for overcrowding. Overcrowding should be given more points than key worker	It is anticipated that generating stock turnover via the award of points to those who under occupy their homes and downsizing, will free up larger homes which will be awarded to those living in overcrowded housing.
More points for those requiring care so they can live independently and for unpaid carers who give care as these people are saving the council a fortune with many people needing care and getting next to nothing from the council	The policy is being amended to introduce 150 points for applicants who provide/receive care and support.

**Is there anything you think should be removed from the revised Allocations Policy?**

Response	Number	%
Yes	11	6.79%
No	151	93.21%
<b>Total</b>	<b>81</b>	<b>100%</b>

What do you think should be removed from the policy?	Response to suggestion
Those in tied houses, e.g. armed personnel they should not be given preferential treatment above people on the list at the moment.	Comment noted. As detailed within the Policy, the Council has a legal duty to pay due regard to the principles of the Armed Forces Covenant. This includes considering the Covenant when developing, delivering and reviewing the Allocations Policy and decisions we make on allocations which may impact the Armed Forces community. The award of points to Armed Forces personnel who are leaving tied accommodation also assists the Council with homeless prevention and to deliver the Armed Forces Housing Referral Protocol.
They must reside locally	The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances
para 19: "Officers are not aware of other landlords who provide reciprocal arrangements. The result of this increased turnover benefits other landlords and their tenants..." is somewhat specious and redundant. What about Housing Associations?	This quote is from the Allocations Policy Review Report and not the policy. The reference from the report includes RSLs.
I wouldn't like to think that people may be forced to leave their homes of many years!!! I think further clarity on this policy should be given. For instance are people going to be forced to give up their homes? Or will they have a choice? I understand the shortages of housing. But forcing someone to move away from well-established friends and family for older people could have a devastating effect on their remaining lives! I would like to know more about what you intend to enforce, or if there is a reasonable choice given?	The Council will ensure that it complies with legislative requirements. As such, there are only specific instances where the Council would make someone leave there home. For example, if a person is living in specially adapted housing and they no longer have a need for this house type. The Council would follow the correct legal process in these rare instances.  If the respondent is referring to the Downsizing Incentive Scheme, this is entirely voluntary.

What do you think should be removed from the policy?	Response to suggestion
I feel the points system is not appropriate and means testing needs to be applied. Also more affordable homes need to be built.	The policy advocates that the points system is a fair and transparent process. Means testing would contravene housing legislation and may not ensure that housing need is addressed.
The removal of need to reside points. They're important	Noted. However they are being replace with a more specific award of points which will be more effective and help those in greatest housing need.
The need to reside points being removed should not be removed!	Noted, however they are being replace with a more specific award of points which we feel will be more effective and help those in greatest housing need.

**Did you have any other comments on the revised Allocations Policy?**

Response	Number	%
Yes	21	13.04%
No	140	86.96%
<b>Total</b>	<b>161</b>	<b>100%</b>

Do you have any other comments?	Response to suggestion
Moray needs to be able to keep people with specific skills which might be needed, this also will mean that less people wish to move away from Moray, hence anything that the policy can do to keep skilled workers in Moray is vital.	Noted
It is high time that the criteria be amended to accommodate the diverse personal/family needs in communities and the priorities now in these amendments should help those in greatest need be attended to more promptly. Also this should help the council determine future housing development needs. Other housing organisations in Moray should be made to adopt equal prioritising criteria.	Noted. Moray Council cannot impose/dictate how other RSLs in Moray operate. All social landlords comply with relevant legislation and meet regulatory standards. This includes the right to develop their Allocation Policy.

2 years and it will change again	We aim to review the Allocations Policy every three years to ensure that we are addressing housing need, complying with legislation and regulatory standards and addressing any ongoing issues identified.
More point should be awarded for age/mental health of those stuck in middle age living with family because there is a lack of housing.  Where are the houses for people who work but can't afford a mortgage/private rent? Why don't we have social housing schemes for these people like they do in Aberdeen and elsewhere? Private rent in Elgin is higher than Aberdeen now!	This would be addressed under the functional assessment process. This would identify if the impact of the person's current housing situation and if the issue would be changed/improved/resolved by moving to alternative housing.  Noted. Options such as mid-market rent properties are aimed at households with low earnings who would have low priority for Council/Housing Association properties. The rent levels mid-market properties are generally at or very close to, the Local Housing Allowance (LHA), applicable to the private rented sector. Moray's private sector rents and LHA are both much lower than nearby bordering areas e.g. Aberdeen/Aberdeenshire, Inverness and it is challenging to bring forward a financially viable new build MMR development at current LHA rates.
Is it possible that the downsizing scheme and under occupancy could be one section with the same allocation of points as in the downsizing scheme?	Noted however we would need to keep these as separate point awards. Not all who under occupy will be eligible for downsizing.
Build more 4 and 5 beds than 2 and 3	Council new build requirements reflect the outcomes of the Local Housing Strategy and the Housing Need and Demand Assessment. Outwith the remit of the Allocations Policy
Initially I found some changes hard to understand e.g. "functional assessment until I got into the later stuff.	Noted
I think it's updated Allocation and made more points available where necessary but dropping points for other Allocations which are not so important but I think overall, it's about fairness and ensuring people understand	Noted
More council housing needs to be built, to provide housing to accommodate people to the area, for those who have lived in Moray all their lives.	Noted. The Council does have a new build programme. These properties are let in accordance with the Local Lettings Plan. Both it and the Allocations Policy must comply with housing legislation which specifies who can be allocated housing to.

**Have the potential changes been explained clearly?**

Response	Number	%
----------	--------	---

Strongly agree	36	20.11%
Agree	105	58.66%
Neither agree nor disagree	32	17.88%
Disagree	3	1.68%
Strongly disagree	1	0.56%
Don't know	1	0.56%
Don't want to answer	1	0.56%
<b>Total</b>	<b>179</b>	<b>100%</b>

**Have the potential effects been explained clearly?**

Response	Number	%
Strongly agree	36	20.22%
Agree	106	59.55%
Neither agree nor disagree	32	17.98%
Disagree	1	0.56%
Strongly disagree	1	0.56%
Don't know	1	0.56%
Don't want to answer	1	0.56%
<b>Total</b>	<b>178</b>	<b>100%</b>

**Key issue one: Awarding points to applicants who are transferring as part of the tenant incentive scheme**

Response	Number	%
Strongly agreed	85	44.97%
Agreed	89	47.09%
Neither agree nor disagree	5	2.65%
Disagree	1	0.53%



Strongly disagree	5	2.64%
Don't know	4	2.12%
<b>Total</b>	<b>189</b>	<b>100%</b>

Key issue one – comments received	Response to suggestion
I think this should also include people in 2 beds who need a 1 bed	Outwith the scope of the policy review. However, changing the criteria would place even greater pressure on one bedroom properties which are already under great demand.
No penalising for refusing home in the wrong area	Applicants on the downsizing scheme will receive unlimited offers without any risk of suspension.
This means potentially two families have the property that suits their needs.	Agreed. This is the intention.
It's good to know that applicants will not be penalised for refusing an offer	Noted
Downsizing points would encourage more people to move to smaller accommodation. Freeing up larger properties for those in need of extra space due to e.g. additional children, who live in inadequate cramped conditions.	Noted
Local people should come first also	The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances
It is a social house, clients must sign and understand it's not a house for life. Thus an agreement to that format.	Scottish secure tenancies can only be ended in specific circumstances. This provides tenants with security of tenure for as long as they want it unless any of the specific circumstances, set out in legislation, apply.
Is there the housing stock available for people to downsize to!	The purpose is to make best use of housing stock and we will use appropriate and available stock as it becomes available
I would have some concerns that this could cause a bottleneck for any applications for smaller properties from those already on the waiting list	Modelling of the Housing List indicates that this will not happen.
Downsizing is stressful and means having to dispose of belongings and furnishings. Signing a new contract not on comparable terms to the old lease means less security of tenure.	There will be no difference in the security of tenure and there will only be minimal difference in rights

## APPENDIX I

<p>Lots of pensioners should be offered smaller housing to free up the family homes for younger families and also younger fitter tenants in smaller same level housing.</p>	<p>Noted however the downsizing scheme is open to any tenant who meets the eligibility criteria. Age is not a factor.</p>
<p>Yes I agree if the tenant is willing to downsize. I myself as a single person have a two bedroom bungalow, but I definitely need the other bedroom as I have several medical conditions that require another person staying over when I am totally incapacitated due to illness.</p>	<p>Noted.</p>
<p>Perhaps the council should place persons/families in the appropriate house size firstly, once the family or size of occupants reduces, then automatically be moved to an appropriate sized property, when available. Removing the volunteer problem.</p>	<p>Households will be allocated the size appropriately at the point the property is let. Over time though circumstances change and for some, household sizes reduce. Legally, we cannot and would not wish to force people to move home to downsize. It is entirely voluntary.</p>
<p>Yes, too many tenants live in oversized properties for their needs but some are loathe to transfer because older residents fear the actual move and what it entails</p>	<p>Noted</p>
<p>I also feel that occupants should have their need reassessed, say every 5 years, to help aid the downsizing initiative and free up larger homes where families are no longer in residence i.e. when children have grown up and left home, those in larger properties should be incentivised to move to a smaller property</p>	<p>Scottish secure tenancies can only be ended in specific circumstances. This provides tenants with security of tenure for as long as they want it unless any of the specific circumstances, set out in legislation, apply.</p>
<p>In a lot of cases, a household will have been assigned a property due to size of the family. Children grow up and move out and the parents no longer need to larger property, however this family will have spent a lot of time and money making this a comfortable home. The policy should take this into consideration and the quality of home offered should reflect what they are giving up. A tenant should be able to refuse a property if the location and condition is not up to standard</p>	<p>Scottish secure tenancies can only be ended in specific circumstances. This provides tenants with security of tenure for as long as they want it unless any of the specific circumstances, set out in legislation, apply. When properties are let, they will meet the Council's Letting Standard. Tenants are able to refuse a property if the location/condition is not suitable.</p>

**Key issue two: Awarding of points to applicants who experience domestic abuse and have an urgent need for rehousing**

<b>Response</b>	<b>Number</b>	<b>%</b>
Strongly agreed	100	52.64%
Agreed	67	35.26%
Neither agree nor disagree	8	4.21%
Disagree	7	3.68%
Strongly disagree	5	2.63%
Don't know	3	1.58%
<b>Total</b>	<b>190</b>	<b>100</b>

<b>Key issue two – comments received</b>	<b>Response to suggestion</b>
There would have to be defined guidelines for awarding these points, including social work involvement. To avoid exploitation.	Guidelines will be developed for staff however each case will be assessed on its individual merit. The aim is to prevent a vulnerable household from becoming homeless.
There would need to be a record that someone has experienced abuse such as a police report or open court case to avoid false claims.	Guidelines will be developed for staff however each case will be assessed on its individual merit.
This would also make the process less stressful for victims of abuse. If being placed directly into a new home and skipping the homeless accommodation is possible then it would be a huge help. Although being given any property, homeless or permanent is a blessing under these circumstances, you still have the stress of having to move twice. This can be worse if there are children involved because it takes longer for them to feel a sense of safety and security until they are in a permanent home.	Noted.
A really positive move towards helping those desperate for a move due to domestic abuse	Noted
If there is police proof as a lot of people around here would lie to get a house quicker!	Guidelines will be developed for staff however each case will be assessed on its individual merit. The aim is to prevent a vulnerable household from becoming homeless.

## APPENDIX I

Absolutely, but there should be processes and criteria (police/social work input) in place to ensure this is not misused	Guidelines will be developed for staff however each case will be assessed on its individual merit. The aim is to prevent a vulnerable household from becoming homeless.
My sympathies to those suffering under circumstances of domestic abuse. This point scheme would hopefully assist them, especially if there are children involved.	Noted
It goes without saying that domestic abuse has an awful effect on individuals and families!!! There should be priority for those who are victim to domestic abuse. Any delay could result in loss of life!	Noted
Building a points scheme for domestic/ any form of abuse, is pointless. Build more affordable homes and provide designated safe houses in a secret location, so action can be taken immediately and offenders prosecuted and moved or incarcerated asap	The aim is to prevent homelessness and protect and empower vulnerable households.
But how to do so while keeping victim's dignity intact is a complex question.	Noted
Know most of these cases are genuine but there are some who claim abuse to gain accommodation then their 'abuser' moves in.	Noted. Guidelines will be developed for staff which will help to reduce the risk of this scenario.
I speak from experience, moving abused families to somewhere local doesn't always work because of small town gossip and the abuser finding the abused in the same locality, then, the Council would need to move them again. Also, there would need to be proof that this is the case and people are not using this just to move quicker than a normal transfer	Noted. Guidelines will be developed for staff which will help to reduce the risk of this scenario.
In my opinion, this score is not adequate to a given person's life situation.	Modelling of the housing list evidenced that the amount of points would ensure that the person is well placed on the housing list and would receive an offer of housing.
People will just claim domestic abuse to get a bigger accommodation like they used to abuse claiming homelessness to get a house	Guidelines will be developed for staff which will help to reduce the risk of this scenario.
Suffering domestic abuse is horrifying and the council should do all that they can to assist people out of these situations to safer homes	Noted
A lot of people will make up they are getting abused to get more points	Guidelines will be developed for staff which will help to reduce the risk of this scenario.

**APPENDIX I**

<p>I feel there are many people in the world going through domestic abuse, disabilities, mental health but I feel everyone should be prioritized equally because everyone has different mental health issues and struggling with their current living situation in different ways and it would be less likely for overcrowding, etc to be homed. I understand people with disabilities wheelchair users etc but mental health domestic abuse treated the same.</p>	<p>Noted</p>
<p>The abuser should be made to leave. If someone is being subjected to domestic abuse they could apply and go homeless and get help from agencies such as Moray Women's Aid.</p>	<p>Anticipated legislated will provide landlords with the power to do this. The policy amendment is intended to reduce risk, empower those experiencing domestic abuse and prevent homelessness.</p>
<p>What to stop someone saying there in a bad relationship just to get moved into a new house</p>	<p>Guidelines will be developed for staff which will help to reduce the risk of this scenario.</p>
<p>But only if the abuser is prosecuted so as to rule any abuse of the system as an easy way to obtain housing when no actual abuse is happening</p>	<p>The Council will develop guideline and procedures for staff which reflect national guidance and good practice. This does not promote that the abuser is prosecuted before assistance is provided.</p>

**Key issue three: Awarding points to applicants who are key workers**

<b>Response</b>	<b>Number</b>	<b>%</b>
Strongly agreed	52	28.26
Agreed	62	33.7
Neither agree nor disagree	20	10.87
Disagree	30	16.3
Strongly disagree	18	9.78
Don't know	2	1.09
<b>Total</b>	<b>184</b>	<b>100</b>

<b>Key issue three – comments received</b>	<b>Response to suggestion</b>
You would need to clearly define what "key worker" status is.	Noted. The policy will introduce a criteria which applicants will have to meet in order to be eligible of key worker points. The Council will have the final say about what role is considered to be a key work and if the allocation of housing will help address a recruitment shortage.
If they are working and can't find other suitable housing they should be able to stay in current property	The person will be coming from out of the area to take up employment in Moray so this will not be possible.
This should be tied in with key partners such as NHS, Police Scotland & Scottish Fire and Rescue Service. Often a huge barrier to recruitment and retention of a key skilled and talented workforce is the lack of affordable housing. Having a policy that supports these organisations with potentially allocated housing with key posts could bring wider support to the Moray area.	Noted. The policy will introduce a criteria which applicants will have to meet in order to be eligible of key worker points. The Council will have the final say about what role is considered to be a key work and if the allocation of housing will help address a recruitment shortage.
Bringing in key workers to the area is a good thing, if there is a shortage of that particular occupation.	Noted
What happens at the 12 month point if they cannot find a rented property or afford to buy one? Private rented properties are getting more expensive and harder to find. So does this scheme really offer an incentive to move here, I personally do not believe so.	We believe that 12 months offers a realistic timeframe to source alternative accommodation. The Council will recover the property after the 12 months and the tenancy will end. In the rare event that this happens, the key worker would have to consider all housing options available, including submitting a homeless application.

## APPENDIX I

As long as the keyworker is relocating and not coming in on a sponsorship so shortcutting the system	Noted. They key worker criteria will be quite specific and is intended to address local employment shortages. Only SSSTs will be used. These combined reduce any risk of the system being exploited.
by doing this you discriminate against those who AREN'T keyworkers	No. The policy is a points based system which uses the specified criteria to address housing need and in this instance help to resolve local recruitment issues
Both my wife and I work for education within moray council and have not heard of this	This is not in place yet. It is a suggested amendment to the policy.
I think the key worker policy is a great idea, however, the 6-12 months agreement part I struggle to understand! Surely if you want to encourage key workers to the area then they should be offered a normal tenancy in order to keep them in the area!	We also need to make best use of our housing stock and address housing need. By offering a short term housing solution to key workers, we hope to continue to do this whilst assisting to address local recruitment issues.
Although we need key workers, there are other people more in need of social housing who cannot afford private rent.	The key worker will only have a SSST for up to 12 month maximum. Thereafter the property will return for further allocation. We don't anticipate that large numbers of tenancies will be allocated to key workers. Currently around 10 applicants on the Housing List would benefit from the change.
Why if they are professional why do they need social housing. odd	Sourcing housing is a factor in encouraging key workers to take up employment in Moray. We know that lack of available housing has resulted in applicants having to turn down posts which are much needed locally. This short term housing solution will assist to resolve this.
Although I agree we need more people working in healthcare in all areas of the job, I also believe that everyone should be treated the same if going by their profession. It wouldn't sit right with me if I knew that a home-carer for example, had been given priority over a family that had suffered abuse or other trauma and needed a home too.	Noted
At a time where we struggle to attract key workers to the area this may be the opportunity for them to find accommodation until they are settled in their key role and area to live.	Noted
The majority of these jobs are reasonably well paid, the issue is the general lack of affordable housing in Moray. Whilst a great gesture I think it could potentially lead to professionals in very well paid jobs living in LA accommodation for far below market rent when those	Noted

## APPENDIX I

who may never be able to afford alternative housing are left still waiting. More affordable housing and a better private letting market in Moray would be more useful for this group of people, but the current climate is not supportive of that.	
Having been the beneficiary of an offer of an SST more than 20 years ago. If this scheme could lead to being offered an SST when the SSST ends I would be in favour.	We also need to make best use of our housing stock and address housing need. By offering a short term housing solution to key workers whilst they source alternative housing, we hope to continue to do this whilst assisting to address local recruitment issues.
Yes, I believe this is only fair	Noted
I was a key worker and was on a reasonable pay structure and could afford, private rental or even future house purchase. Surely means testing is required in this area.	The policy amendment recognises the pressures and demands in the housing sector in Moray. There is a particular shortage of suitable private rented accommodation for key workers to utilise. This has resulted in offers of employment being refused. It is anticipated that this short term housing solution will assist to address this issue.
Moray needs all the key workers it can get so anything which encourages them to move or stay would help.	Noted
Yes Moray needs key workers to fill vacancies that the public are suffering from not having i.e. say, Physios	Noted
People who aren't key works could be just as desperate for a house and to them their job is important	Noted
Whilst it's important to bring key workers into the area, I feel other circumstances are higher priority for housing	The key worker will only have a SSST for up to 12 month maximum. Thereafter the property will return for further allocation. We don't anticipate that large numbers of tenancies will be allocated to key workers. Currently around 10 applicants on the Housing List would benefit from the change.
Your waiting lists will get longer as there is hardly any houses	Noted
I'm am concerned that key worker applicants offered a short term tenancy will be unable to secure alternative housing (either rented or purchased) before the tenancy runs out. What would happen in this situation?	We believe that 12 months offers a realistic timeframe to source alternative accommodation. The Council will recover the property after the 12 months and the tenancy will end. In the rare event that this happens, the key worker would have to consider all housing options available, including submitting a homeless application.



<p>It's good to bring key workers to Moray but who's to say that after just a year they are able to secure accommodation. There is no guarantee, meaning that it may backfire and make people homeless</p>	<p>We believe that 12 months offers a realistic timeframe to source alternative accommodation.</p>
<p>This probably won't be enough points for areas in high demand - should it be higher? I would hope this would apply to NHS/care sector but also preschool childcare for under 3 which is impossible to find due to a lack of qualified staff and the pressure to deliver free childcare provision for older pre-schoolers (3-4). I would be sceptical of this policy change supporting private companies as could see it being exploited.</p>	<p>Modelling undertaken on the housing list evidenced that the level of points would equate with an offer of housing being made, including in areas of high demand. The policy will introduce a criteria, based on local research, which applicants will have to meet in order to be eligible for key worker points (see Section 28.3 of the draft policy). The Council will have the final say about what role is considered to be a key worker but the roles will be public sector and not in the private sector.</p>
<p>Covid 19 made it clear that a variety of sectors can be considered key work. While getting more healthcare workers and educational professionals is a priority, giving housing preferentially to "key workers" who have less need than non-key workers may cause more problems. I'd be interested to see what is considered key work and if the criteria could be combined with other factors i.e. salary</p>	<p>There is no nationally agreed definition of a key worker. Covid 19 used a definition based on work which was critical to the response to the Pandemic. The Allocations Policy has used local research (HNDA) to identify key roles for which there are recruitment shortages in Moray.</p>
<p>I am classed as a 'key worker' and earn over £100k a year. Key workers should not automatically get higher priority for housing.</p>	<p>Key workers will not automatically get priority. The applicant must fulfil the criteria set out in the policy, have support from the employer. Notably the council will have final say as to whether they are considered a key worker for the purposes of the Allocations Policy.</p>

**Key issue four: Removing the award of need to reside points**

Response	Number	%
Strongly agreed	29	16.57
Agreed	53	30.29
Neither agree nor disagree	39	22.29
Disagree	18	10.29
Strongly disagree	28	16.00
Don't know	8	4.57
<b>Total</b>	<b>175</b>	<b>100</b>

Key issue four – comments received	Response to suggestion
If you need housing you should accept suitable housing anywhere	Noted
If people need to live in an area for work, they need to live in that area. Moray is a rural area, hence if someone worked in Elgin however was forced to live in Tomintoul but didn't drive this would mean they'd be unable to work. Moray doesn't have the strongest public transport links, and it could become very expensive for people to live in a more rural part of Moray.	Noted
Some people would much prefer to be somewhere they are familiar with and have friends etc. I understand that if people need to move then the point system is to remove it.	Noted
anything that means removal of points which have been awarded means you risk further alienating tenants	Noted. So many applicants are eligible for the award of points, that it has diluted their impact and rendered them ineffective. Removal of the points should have minimal impact across the List.
I disagree with this because the previous question asked about giving priority points to key workers (in my opinion everyone is “key “it shouldn't come down to your job ). If allocating points in this way helps even slightly then surely it's worth it.	Noted. So many applicants are eligible for the award of points, that it has diluted their impact and rendered them ineffective. Removal of the points should have minimal impact across the List.
Need To Reside points proved to be extremely beneficial to bringing up young children; their schooling requirements; keeping in regular employment and transport difficulties.	Noted, however, so many applicants were eligible for need to reside points, that it has diluted their impact and rendered them ineffective. Removal of the points should have minimal impact across the List.
Being a disabled person myself I strongly agree to this policy. I have first-hand experience of the need for family members to be nearby to support and help.	Noted. Although this points criteria is being removed, it is being replaced by a new points category of care and support which has a higher level of points.
If more affordable homes were built there wouldn't be a shortage and more choice for applicants in that position	Noted
I think awarding points for this situation is wastage of points	Noted
Should not be removed. Hard enough to get points as it is. Even with overcrowding and need to reside points, still far up the list.	Noted. So many applicants are eligible for the award of points, that it has diluted their impact and rendered them ineffective. Removal of the points should have minimal impact across the List.

As long as there is some other way of helping people to reside in area where they have a need, I would agree that this policy should be amended	Noted
This is essential for people or families who have a support system where they reside which is essential for people with mental health, chronic illness, children and mobility problems.	Noted. Although this points criteria is being removed, it is being a new point category of care and support is being added with a higher level of points.
As long as there is some other way of helping people to reside in area where they have a need, I would agree that this policy should be amended	Noted
This is essential for people or families who have a support system where they reside which is essential for people with mental health, chronic illness, children and mobility problems.	Noted. Although this points criteria is being removed, it is being a new points category of care and support is being added with a higher level of points.
Local persons should be a priority over persons from outwith the area	The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances.

**Key issue five: Awarding points for care and support**

Response	Number	%
Strongly agreed	89	49.17
Agreed	70	38.67
Neither agree nor disagree	16	8.84
Disagree	4	2.21
Strongly disagree	2	1.10
Don't know	0	0
<b>Total</b>	<b>181</b>	<b>100</b>

Key issue five – comments received	Response to suggestion
Because in the majority of cases with elderly or disabled tenants, their conditions deteriorate over time and their needs alter.	Noted

## APPENDIX I

People who wish to live independently however need extra care and support would benefit strongly by this change, so I'd personally highly recommend this change as vital.	Noted
Home is a better environment to be in	Noted
Anything to keep people's independence is a good thing for the individual	Noted
Employing more carers to fulfil the role of 'care in the community' would enable people to live in their homes without the need for admission to care homes or hospitals. The care sector is grossly understaffed at present and this is having a very negative affect on people's ability to remain in their own homes.	Noted
but you need to remember that "care" is a wide system	Noted however the type of care referred to would be care which would assist a person to live independently in their home.
As statutory care services are hard to come by and extremely over worked, if there is family/friends that are able to do this for someone even on a partial basis, as in possibly two visits per day, helping with housework, shopping and or personal care, this would significantly reduce the amount of home help from elsewhere. Therefore free up space for those who don't have family or friends available.	Noted
If it can be made easier for a person/s to live in their own home with potential carers living nearby, then this scheme should be encouraged - especially now as there is a scarcity of professional carers to provide help at home.	Noted
Yes providing there is a critical care need in line with current eligibility criteria, otherwise it is open to be misused.	Noted
Sounds good and helpful and to reduce costs of statutory care and support services	Noted
I think it is so important to give this care and help service. There is nothing like being able to be independent in your own home near family and establishment friends; also being surrounded with your treasured personal possessions of a lifetime!	Noted
However, it's putting more burden and pressure on families trying to give care/support on their loved ones. It's fairly obvious that the care support system is failing fast. This needs to be addressed by local authorities and central government..... It's being overlooked.	The policy intention is to aid people to give or receive support. It is not intended that this should add pressure to families to do so.
There's so much pressure on social care, it's important to assist as much as possible, those tenants who need to be close to specific support	Noted
Essential for those who need support	Noted
People with disabilities should get more points as these are the ones that really need the housing and not your drug addicts that seem to get everything	The policy provides a framework for assessing housing need and to make best use of housing

	stock and will be applied in a non-judgemental manner.
This is important for unpaid carers. There a lot of carers that do not live in the same area that still provide care and support to a family member. This support is important as it is actually saving the council money for not providing home care etc	Noted
How can people evidence these situations?	Examples of evidence are included in the policy
Many claim to care for family members in order to secure preferred place of residence, however speaking from an experienced home carer over the past 6 years, this isn't always the case. So evidence would be better to get in order to weed out people just saying they care for their loved ones when in actual fact they only visit granny once a month etc.	Evidence will be required, as stated in the policy.

**Key issue six: Amending the criteria for the award of functional assessment points**

Response	Number	%
Strongly agreed	40	25.16
Agreed	66	41.51
Neither agree nor disagree	37	23.27
Disagree	5	3.14
Strongly disagree	3	1.89
Don't know	8	5.03
<b>Total</b>	<b>159</b>	<b>100</b>

Key issue six – comments received	Response to suggestion
People who may need extra support sometimes may end up being ignored. I feed that if the policy was made very clear then this would help them to understand why their case was rejected if it was. This also would allow better support to those who do need assistance, by specifying exactly what assistance is there and how they can claim it.	Noted
Anything that will make life easier/simpler for applicants is a positive move. However, it would have to make sure that all criteria is still fully understood	There is additional information and guidance for applicants on the functional assessment process, written in plain language.

## APPENDIX I

and that applicants are aware of all help available and what it covers because a lot of people aren't aware of which needs apply and therefore could be missing out.	This is publicised and available on the council website and staff provide signposting to these resources.
it is easy to write on an application that you need help around the home, an assessment by a qualified person could go a long way as to either proving/disproving this and also to find a more suitable match of property for the applicant/s	A qualified Housing Occupational Therapist completes assessments and valid evidence is required.
I think there still needs to be a proper assessment of need to ensure all adapted houses are going to the correct people that need it.	This is undertaken using the functional assessment process set out in the policy.

**Key issue seven: Prioritising under occupation of social housing points to transfer applicants**

Response	Number	%
Strongly agreed	85	50.90
Agreed	58	34.73
Neither agree nor disagree	13	7.78
Disagree	27	4.19
Strongly disagree	2	1.20
Don't know	2	1.20
<b>Total</b>	<b>167</b>	<b>100</b>

Key issue seven – comments received	Response to suggestion
No penalising for refusing home in a not suitable area	Transfer applicants will only be offered housing in lettings areas which they have selected in their housing application.
Prioritise locals	The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances
I think they should be allowed to stay in their property especially 2 people in a 3 bed house.	There is no requirement forcing anyone to move.
I think that if say, a single person living in a 3/4/5 bedroom property is to be rehoused and only a 2 bedroom becomes available then they should still be considered for that move	There may be exceptional circumstances where, in order to make best use of housing stock, this would be considered.
Is this not similar to the downsizing scheme?	The Downsizing Scheme is a separate process.
Again do we have the stock to move the too	The purpose is to generate stock turnover, maximise allocation and make best use of available housing stock.
Yes but realistically there just need to be more properties added to housing stock to really make a difference.	Noted
New builds that are built should ne 4 and 5 beds only freeing up the 2-3 bedroom homes they currently occupy	New builds are planned and built to reflect the identified housing need established in the Housing Need and Demand Assessment.
not very clear who would get 250 points versus who would get 50 points	250 points are for transfer list tenants and 50 points for housing list applicants.

**APPENDIX I**

<p>Again, tenants should have a regular review of their circumstances to ensure under occupancy is eradicated and those no longer having a need for a large/family home are assisted to move to a smaller property. I believe there are many tenants occupying large homes, which were appropriate when awarded, but when children grow up and leave home, they remain in the property. I know one family of 2 parents and one child, still living in a 4- bedroom home, since 2 children are now adults and have left home. This is unfair, but there is currently no reassessment carried out to ensure housing remains appropriate</p>	<p>Scottish secure tenancies can only be ended in specific circumstances. This provides tenants with security of tenure for as long as they want it unless any of the specific circumstances, set out in legislation, apply.</p>
<p>Makes sense to free up a larger home for someone who (genuinely) needs one.</p>	<p>Noted</p>
<p>This will increase chances of families getting the bigger home they need as well as properties being under occupied to be appropriately used as above.</p>	<p>Noted</p>
<p>I think it's important for people to downsize so this allows another family to be allocated a house the fits them but I would also worry about how this is prioritised for people already waiting on the housing list.</p>	<p>Noted</p>
<p>Thought this already was the policy??? It said 500 points and now 250???</p>	<p>The award of 250 points (per bedroom under occupied) may be awarded to those who are under occupying on the transfer list. Not all of these applicants will be on the Downsizing Scheme (not all will be eligible). The award of Downsizing Scheme points is in addition to under occupancy points and aims to ensure that those on the Scheme are reached for an offer soonest and free up larger housing which is in great demand.</p>
<p>Families are in desperate need of larger accommodation and any change that makes that possible is good. Awarding points as incentive is a good idea</p>	<p>Noted</p>



**Key issue eight: extending the timeframe for the award of points for the loss of tied accommodation**

<b>Response</b>	<b>Number</b>	<b>%</b>
Strongly agreed	36	27.27
Agreed	49	37.12
Neither agree nor disagree	25	18.94
Disagree	13	9.85
Strongly disagree	8	6.06
Don't know	1	0.76
<b>Total</b>	<b>132</b>	<b>100</b>

<b>Key issue eight – comments received</b>	<b>Response to suggestion</b>
Armed Forces personnel can ask for an eviction notice - this assists in climbing the housing ladder. They can also ask to remain in the property though paying market rates (if there is availability). Lastly, only in extreme circumstances will a service person only have 3 months' notice to leave their accommodation. Everyone is aware of their contract end date from the start on engagement.	The cessation of housing certificate does not assist personnel to climb the housing ladder. Those in tied accommodation (which is not restricted to Armed Forces personnel) may have difficulty sourcing accommodation within the timeframe of their tenancy/accommodation and employment ending. The policy intention is to prevent and reduce homelessness.
Without this policy, people moving from tied housing usually have no alternative but to rely on the local authority.	Noted.
Moray is home to RAF Lossiemouth and Kinross Barracks, these people who work there actually fight for us and therefore need all the support they can get once they leave. They shouldn't be penalised for this, especially if they are skilled and may wish to stay in Moray since some wish to leave Moray taking their skillset with them.	Noted.
If it means people will have to refuse a property then this is not good	If they applicant has to refuse an offer because they are not able to accept due to timeframes for ending their tenancy, it will be deemed to be a reasonable refusal and the applicant will not be penalised.
They know they have to leave a tied property so they should be making prior arrangements. Why should people on the list be penalised and put up the list	Those in tied accommodation may have difficulty sourcing accommodation within the timeframe of their accommodation

## APPENDIX I

because if these people. Some people have been in the list for numerous years for them to be ousted again for these persons	and employment ending. The policy intention is to prevent and reduce homelessness.
Yes it should, when you leave the forces after any time housing is a big worry. I know this from personal experience. I never received any offer of housing or points when I left the RAF and I am still in expensive private rented accommodation many years after leaving. So yes it needs to be sorted.	Noted.
Anything that helps to eliminate homeless has to be a positive for everyone.	Noted.
Prioritise locals	The Allocations Policy must comply with relevant legislation. Section 20 of the Housing (Scotland) Act 1987 (as amended) states that the Council will not take account of whether an applicant lives in the area in specific circumstances
Having lived in tied accommodation you have years to prepare for this event and never went with holidays etc to save up monies. Not everyone is the same but the companies they work should interject with the message prepare	Noted.
This seems a reasonable time frame to allow the chances of suitable property to become available	Noted.
Are there many applicants in tied housing, and would this have a significant impact?	At the time of drafting the policy, modelling identified 25 applicants on our Housing List. The amendment will provide these applicants with additional time to reach the top of the housing list and potentially be made an offer of housing.
My understanding is people in this situation usually have an awareness of it happening and should make alternative arrangements as any other person would, I don't think this should fall to the LA, however if it's a legislative requirement then it should be implemented accordingly.	Noted.
My son is in the armed forces and has been to war three times in Iraq and Afghanistan. We should as a nation look after our armed forces personnel, as they have looked after us as a nation!!!	Noted.
Especially for the armed forces who have served their country and worked for the crown and quite often get forgotten or fall through the net.	Noted.
They are in full time employment they know when it ends and should be more than capable of finding alternate accommodation	Those in tied accommodation may have difficulty sourcing accommodation within the timeframe of their tenancy and

	employment ending. The policy intention is to prevent and reduce homelessness.
--	--