



**Consumer  
Focus**  
Campaigning for a fair deal

# **Consumer Focus response to 'Fair and flexible' – Communities and Local Government's consultation on the draft guidance on social housing allocations**

**October 2009**

# Consumer Focus response to ‘Fair and flexible’

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## About Consumer Focus

Consumer Focus is a statutory body that champions the needs of consumers across England, Wales, and Scotland and, for postal services, Northern Ireland. We operate across the whole of the economy, persuading businesses and public services to put consumers at the heart of what they do. Consumer Focus has the power to take action where markets are failing consumers and to ensure a fair deal for all – especially the vulnerable and disadvantaged. As well as highlighting problems for consumers, we work with a range of organisations to champion creative solutions that improve consumers’ lives.

## Introduction

The Government has a target to provide 112,000 new homes to rent or buy over the next two years that are affordable to buy or to rent<sup>1</sup>. Government also wishes to enable local authorities to respond to housing pressures by reflecting the needs, demands and aspirations of their area in the way they allocate housing. At the same time Government is reaffirming the need to give priority to those in greatest need, using the ‘reasonable preference’ criteria, for example those with serious medical conditions, who are overcrowded or have experienced homelessness.

The draft guidance aims to reinforce councils’ ability to meet local needs and priorities through their housing allocation priorities, and removes the assumption of ‘cumulative preference’ where those who fall into more than one of the reasonable preference criteria may also accumulate priority status. It also strengthens councils’ freedom to prioritise specific local needs such as people who have been on a waiting list for a long time, who have strong local connections, to attract workers with particular skills or support people in low-paid work.

Councils work closely with housing associations around allocation policies to meet local needs, but the system is complex and poorly understood, giving rise to perceptions that the system is unfair. The guidance is intended to improve understanding by getting councils to do more to inform communities about the demands and pressures on housing, and who is getting housing, and do more to consult tenants and residents on their policies, involving people in the difficult decisions about priorities so that policies have greater legitimacy among residents.

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<sup>1</sup> Building Britain’s Future

## Consumer Focus response

Our response concentrates on two issues: the objectives and outcomes of allocation policies and the questions about information, engagement and feedback.

### Objectives and outcomes

#### **Q1 Do you agree with the objectives and outcomes which local authorities should seek to achieve through their allocation policies?**

Consumer Focus broadly agrees with the objectives and outcomes outlined in the draft guidelines. We welcome the emphasis on giving people more of a say over the accommodation they are allocated, and on the need for authorities to consider the local housing market as a whole, including private rented properties and low cost home ownership options.

As decisions about housing have significant implications for households, financial planning and commitments, it is incumbent on authorities to make sure applicants have access to information and independent advice about the available options so they can make informed choices about what is best option for their circumstances.

The draft guidance mentions that authorities should consider how they can use their allocation policies to support people in work or who are seeking work, highlighting specific criteria such as essential workers, skills shortages, and worklessness.

We would add the working poor to the list of potential criteria for local priorities. Support for people in low paid work is mentioned in the foreword but not specified in the guidance. As our predecessor body the National Consumer Council (NCC) pointed out<sup>2</sup> this group is routinely overlooked in public policy and service provision even though they form a substantial group in society: NCC estimated that in Britain they number around five million people. Many are forced to live in shared or unsuitable accommodation which is often of poor quality, is temporary, and causes people to feel unsettled. The working poor should be considered along with other local priorities as they also need access to social housing and other affordable options such as shared ownership and low-cost rental property. Such an approach also fits well with the duty to give due regard to tackling socio-economic inequalities envisaged in the Equality Bill.

### Recommendation

Communities and Local Government (CLG) should add the working poor to the list of potential criteria for local priorities

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<sup>2</sup> More snakes than ladders, an insight into the lives of the forgotten working poor, NCC, July 2008

## A comprehensive strategy for information, communication and engagement

**Q2 What can local authorities do to raise awareness and understanding of social housing allocation among local communities?**

**Q3 How can local authorities engage most effectively with local communities in order to shape local allocation policies?**

**Q4 What is the best way for local authorities to provide information and facts about how the allocation process is working in their area?**

Local authorities should develop a comprehensive strategy across these questions to avoid treating them as separate issues, though each element of the strategy will need a clear purpose that is effectively communicated to all stakeholders.

The strategy should start with a mapping exercise so that authorities have a clear understanding of what they already do to raise awareness and understanding of social housing allocation and what needs to be improved, as well as what engagement takes place and what needs to be improved.

The NCC's work on putting people into public services<sup>3</sup> included a framework for such a strategy that included:

- Leadership and support at senior level
- Communication plan
- Clear purpose
- Use the right methods
- Plan for diversity
- Consumer-focused implementation

Consumer Focus recommends that authorities involve social landlords, tenants and community representatives from the start so that their views inform the strategy and communications plans. Their involvement will strengthen the effectiveness of the overall strategy and policies, as well as helping to raise awareness and understanding of them through their own networks, stakeholder and user groups.

The strategy will need a dedicated budget and resources as well as an effective leader who has support at senior level. Research for the Joseph Rowntree Foundation (JRF) concluded that engagement has to be given visible organisational priority, making it part of the performance management system so that staff can be confident about prioritising this area of their work<sup>4</sup>. In some cases engagement has been seen as an optional add-on that staff felt they have to justify or 'squeeze in' to other work which appears to be more highly valued. Authorities should encourage a culture of respect for engagement and for the views of those involved, to reflect its perceived importance.

Detailed preparation and planning, including how to identify the relevant communities, the most appropriate mechanisms for reaching them and taking on board any feedback they provide, are critical success factors for communication and engagement.

### Recommendation

The guidance should include advice on developing comprehensive strategies for communication and engagement. The strategies should be designed with input from relevant stakeholders.

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<sup>3</sup> Involving people in policy, NCC, April 2008

<sup>4</sup> Public officials and community involvement in local services, Joseph Rowntree Foundation, 2008

## Diversity of methods for diverse needs

Authorities will need to develop insight and understanding of the diversity of local communities, using segmentation techniques for example, in order to ascertain the best channels and mechanisms for communicating and engagement. This is also a prerequisite for identifying any specific target groups, learning about their attitudes, feelings and perceptions, especially where one of the objectives may be to counter prejudice and misunderstanding.

There is no single solution as the methods and techniques will vary according to the purpose and context of the exercise and the particular community. Organisations such as Involve, the Consultation Institute and Participation Works have developed guidelines on the different methods and their relative strengths and weaknesses, with a range of resources accessible via the CLG website<sup>5</sup>. The guidance could also draw on the work of the CLG Citizen Engagement Tools group to highlight effective methods and case studies. Generic survey questionnaires, public meetings or single communication channels such as a newsletter or publishing data on a website are likely to be much less effective in raising awareness and understanding or in engaging with people than multiple channels and methods targeted at specific communities. Involving those communities in deciding on the methods also helps secure their commitment to the process.

Working in partnership with local residents, community organisations and representatives will enable authorities to learn more about what works best – and just as importantly what does not work - in different areas and different groups. It will also help to make sure the authority uses language and messages that have resonance with their target groups and build credibility and legitimacy for the allocation policies. Authorities should be open to suggestions from within communities about how to communicate and engage and wherever possible work through respected or trusted local networks, third sector organisations and individuals. London University research for JRF highlighted the importance of outreach work to supplement this, especially in diverse communities, to encourage and promote cohesion rather than conflict - for example between newer and more established communities<sup>6</sup>.

## Recommendation

The guidance should emphasise the importance of and recommend authorities adopt a multi-layered and 'segmented' approach to information provision and to engagement.

## Citizen/consumer-focus

The importance of taking a citizen/consumer focus to ensure the effectiveness of communication and engagement has been taken up in techniques such as social marketing. Although the goals of social marketing tend to be about changing behaviour, often around health issues such as smoking cessation or reducing teenage pregnancy, the methods have been proved to be especially effective for engagement with groups of 'hard to reach' people. The approach relies on thorough and systematic analysis of the issues and involves going to where people are, and starting from where they are in their thinking and attitudes about issues. The National Social Marketing Centre<sup>7</sup> has developed training materials and a database of case studies to showcase best practice. These proven techniques are transferable to issues such as housing allocation and the perceived unfairness.

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<sup>5</sup> [www.involve.org.uk](http://www.involve.org.uk); [www.consultationinstitute.org.uk](http://www.consultationinstitute.org.uk); [www.participationworks.org.uk](http://www.participationworks.org.uk)

<sup>6</sup> Community engagement and community cohesion, Joseph Rowntree Foundation, 2008

<sup>7</sup> [www.nsmcentre.org.uk](http://www.nsmcentre.org.uk)

Authorities will need to show persistence and creativity if they are to reach all the communities that they need to communicate and engage with. Common Purpose, a leading community development organisation, ran a project called Local Links, working with diverse communities in Yorkshire to encourage active neighbourhood networking and information sharing. Using a combination of techniques over a period of time they successfully encouraged neighbourliness, brought down barriers between different groups and improved mutual understanding by enabling people to get beyond 'turf wars' and 'them and us' impasses, sometimes creating healthy controversy in the process<sup>8</sup>. People felt better informed about the range of issues they had been involved in and better connected to the community as a whole. Even so, Common Purpose found it difficult to draw in people from Pakistani and other black and minority ethnic groups as well as from tenants' and residents' groups.

### Recommendation

The guidance should recommend that authorities apply 'consumer-focused' techniques signpost authorities to examples of best practice.

### Monitoring, evaluation, feedback

Authorities will need to pay attention to how they collect and report feedback, which forms an essential aspect of credibility and accountability. Clarity and transparency about what people and communities are expected to do, what scope there is to change or influence the priorities and policies and what the decision-making process is are essential for successful engagement. Citizens and communities want to know they have had an impact, that their views matter and have been taken seriously so authorities must be effective in communicating back an explanation of how their input has been used.

Ongoing dialogue is sometimes more effective for communities and for authorities than a 'one-off' event because it facilitates feedback, builds understanding of complex issues and develops trust<sup>9</sup>. Authorities should consider whether a longer term strategy is more cost-effective than a series of initiatives because of the complexity of the issues they need to consider in housing allocation, and the need to monitor and keep their policies under review.

### Recommendation

The guidance should ensure authorities have effective monitoring and feedback mechanisms that reach the relevant communities, drawing on examples of good practice to be found, for example, in the sources mentioned.

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<sup>8</sup> Local links – developing active networks in local communities, Joseph Rowntree Foundation, 2008

<sup>9</sup> Public officials and community involvement in local services, Joseph Rowntree Foundation, 2008

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