

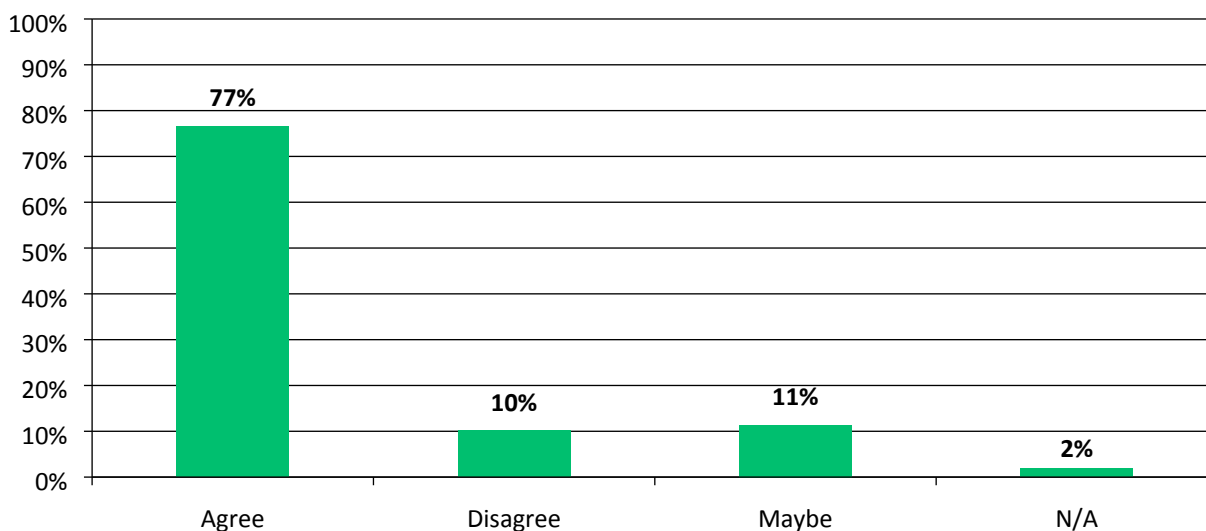
# Appendix A

## Summary of Sevenoaks District Housing Allocations Policy

### Consultation Results 2018

#### Question 1

#### Do you agree with the proposed changes to the Local Connection Criteria (Section 3.1) ?



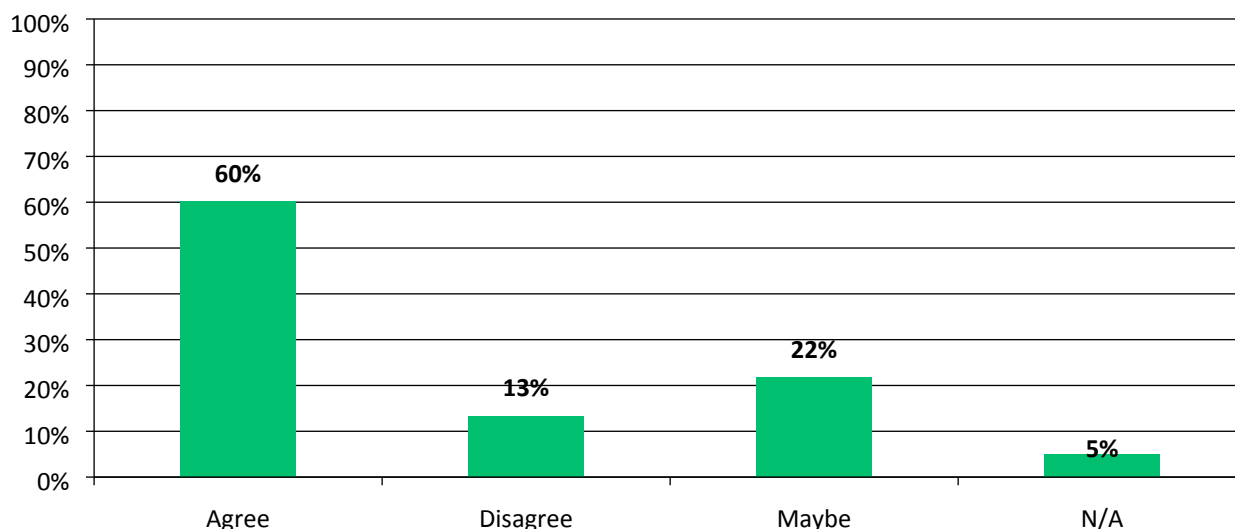
Comments:	Response and actions taken:
1. Think it is important to include Grandchildren when looking at family with caring need.	Wording in section 3.1(c) has been amended to be 'typically but not exclusively relating to...'
2. More clarification is needed on point e under ex armed forces and the reasoning why. For example, those dismissed for inappropriate conduct should not be considered.	The armed forces criteria is set out in section 4.1. If inappropriate conduct is a concern, then the factors under section 5.3.4 would be applied when assessing suitability to be a tenant
3. Close connection rules are far too strict and don't allow for unmarried relationships.	See point 1 above.
4. I think for people who have no living family at all (and there cannot be lots of those) the family connection to move to another area should be waived.	The other qualifying factors set out in Section 3 would then apply including local connection, employment, older people and Right to Move.
5. Caring for a relation is important if they are in need of support including getting shopping, if they can't get their shopping on their own. This should be considered a need, it goes without saying that anyone who can't manage to go shopping would also struggle with hospital/doctors appointments and would need help with paying bills.	Comment noted. Wording in 3.1(c) amended from '(i.e. to carry out shopping once a week)' to '(e.g. occasional or infrequent help with a task)'. This would be assessment on a case-by-case basis. Wording changed to clarify this further.

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6. Why should British Nationals need to connections of 2/3 years (in some cases of at least 5 years) in lieu of non-Nationals entering the UK (legally or illegally) and able to choose anywhere they wish to live?	Section 5.2.1 sets out Immigration Status. The qualifying criteria in section 3 would apply to everyone with an eligible immigration status to enter or remain in the UK - as defined in s.13(2) of the Asylum and Immigration Act 1996 and under the Immigration Act 1971. The Council would work with the Home Office for anyone who does not have this immigration status.
7. Removes duty to house those needing to move to the area to take up offer of employment. This is not fair because it means you'd have to turn down a job because you live too far away and have no means of moving closer.	Section 3.5 has been introduced which puts a greater emphasis on qualifying for social housing under 'Right to Move' for work related reasons - as set out in The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 (SI 2015/ 967).
8. Should include people who contribute to the community in other ways e.g. volunteering.	Comment noted. Section 3.2 (Employment) - following wording added: '(e) Where an applicant can provide evidence that they are unable to engage in paid work, a community contribution including substantial voluntary work or employment related training, both within the District, would be considered on a case-by-case basis to meet this criteria.'
9. The over 60's may not be able to work 16 hour a week.	Section 3.2 employment - This relates to adults of a working age only, for details relating to older people see sections 3.4, 4.2 and 6.7. Also see point 8. above added for people unable to engage in paid work.
<b>Summary of other comments:</b>	
<p>10. I particularly support the increase from a 6 month residency requirement to a two year one. I also agree that holiday lets and bed and breakfast do not qualify as residency.</p> <p>11. I agree that housing should be for people with a genuine connection to the area.</p> <p>12. I feel that is the right thing to do and feel people with health issues &amp; diagnosed mental health illness cases should be looked into &amp; given more priority. Yes, the changes seem fair.</p> <p>13. I think some kind of local connection priority needs to be acknowledged, for local people who want and need to stay where they have been raised. If they have always lived in a specific village, hamlet or town or if an applicant has multiple generations of family from a specific place which they want to stay/return to and they can provide evidence of this history then they need to be given some kind of a mention in regards to local connections. In many of these cases, local people are very invested in these villages and the villages need their support.</p> <p>14. If you are 75 years old and a single person, wanting to be near your children and being lonely that should be taken into consideration.</p> <p>15. I agree although some older people have lived in the area for more than 2 years but may not have any family but friends who care for them who have lived in the area.</p> <p>16. It is important for people's mental health to live near to our relatives. If close relatives live here, the level of support they/we need should be irrelevant.</p> <p>17. Councils need to be open to a wider variety of people with different circumstances and not become stricter.</p> <p>18. I don't agree with the being employed in Sevenoaks district, I had to take the first job that came.</p> <p>19. I still have family members living the area, but now I wish to return to the area in my retirement I am told that is not a local connection? Extremely unfair.</p> <p>20. If your parents or close relative had recently bought and sold a property in a different area. Then the 5 year connection may be valid. You would still be in same position needing social housing but discriminated against because your parents have moved away.</p>	

## Question 2

## Do you agree with the proposed changes to the Employment Criteria (Section 3.2)?



Comments:	Response and actions taken:
1. An allowance should be made if your employer moves the place of employment to SDC. You should be able to apply immediately otherwise it may result in people losing their employment, as the distance to travel to work is too expensive or just too far to travel.	Section 3.5 has been introduced which puts a greater emphasis on qualifying for social housing under 'Right to Move' for work related reasons - as set out in The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 (SI 2015/ 967).
2. I disagree with the point re temporary contract. This implies someone on a 12 month temporary contract will be applicable. Fixed long term contracts of over 12 months should be acceptable but not temporary contracts 12 months or less.	Any changes in income levels or to employment contracts would be re-assessed as part of the Annual Review progress with each applicant on the Housing Register. The Governments code of guidance urges councils to support households in low paid employment and incentivise applicants to take up employment.
3. It doesn't mention those that are retired and have lived in the area for over 25 years and are being asked to move because the current property is unsuitable.	Please see Section 4.2 regarding over 55 year olds.
4. Unless disabled and cannot work.	Comment noted. Section 3.2 wording amended to include other community contributions to be taken into account. Medical and disabilities would always be taken into account when assessing applications.

### Summary of other comments:

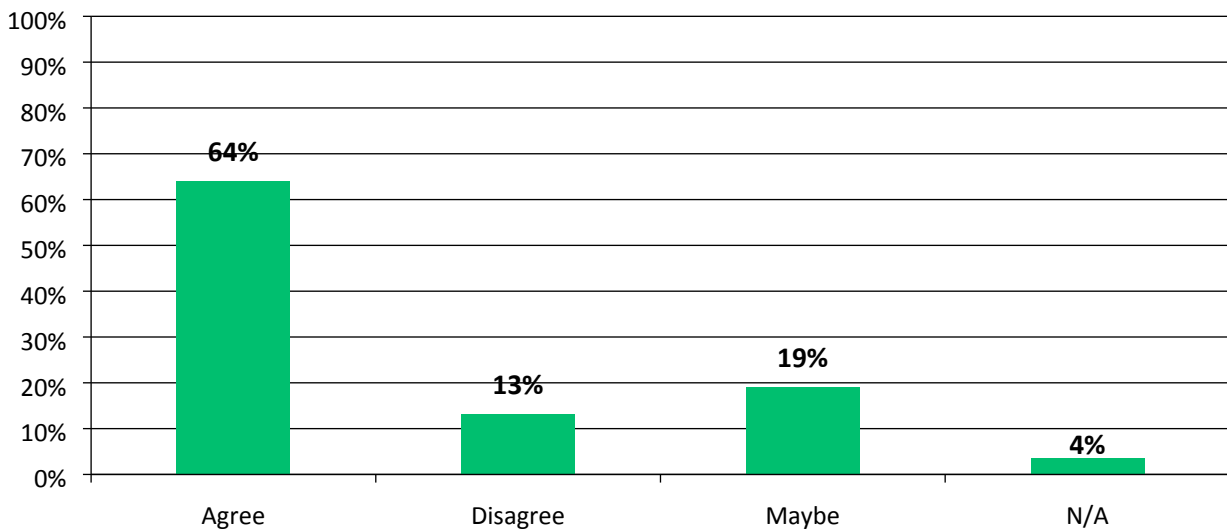
5. Good to have people living and working in the area.
6. Employment or self-employment 99.9% of the time is always a positive and any help or advice that will support that is a positive.
7. I strongly agree with this. In addition, it would be good for those people who really need to live in this area.
8. I agree with the proposed changes as it considers different types of employment contract as well as self-employment.

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9. Good luck proving the hours you've worked for the last six months if you're on a zero hour contract!
10. I agree with all except the ability to get housing in Sevenoaks based on working only 16 hours per week. Surely, such a small amount of work could be found in almost any area, unless the persons being considered had disability, which stopped them working for more than 16 hours per week.
11. I do not agree with this, as there are not enough jobs in the district to supply this need. The proximity to London makes it easier to get work there and earn more money but enjoy living in the district of Sevenoaks. People work in London to afford to employ local people who are plumbers, electricians etc.
12. Think limiting work area to just Sevenoaks district is a short sighted.
13. I agree there must be a connection but people may not work in the district but have childcare in the district.
14. Seems fair policy but worry that people can get fraudulent documents.
15. I agree that social housing should be offered to working people to give them a start at least being able to save to buy.
16. All depends on how long they have had the 16 hrs or full time employment, open to abuse for those that could get those hours just to get the move they want then give it up once their aim has been achieved.

### Question 3

#### Do you agree with the proposed changes to the Income Limit Criteria (Section 3.3)?



#### Comments:

1. It is essential that household income per person is included in the Income Limit Criteria.

#### Response and actions taken:

As set out in Section 3.3, the income considers all household members to give a combined income across all members of the household.

#### Summary of other comments:

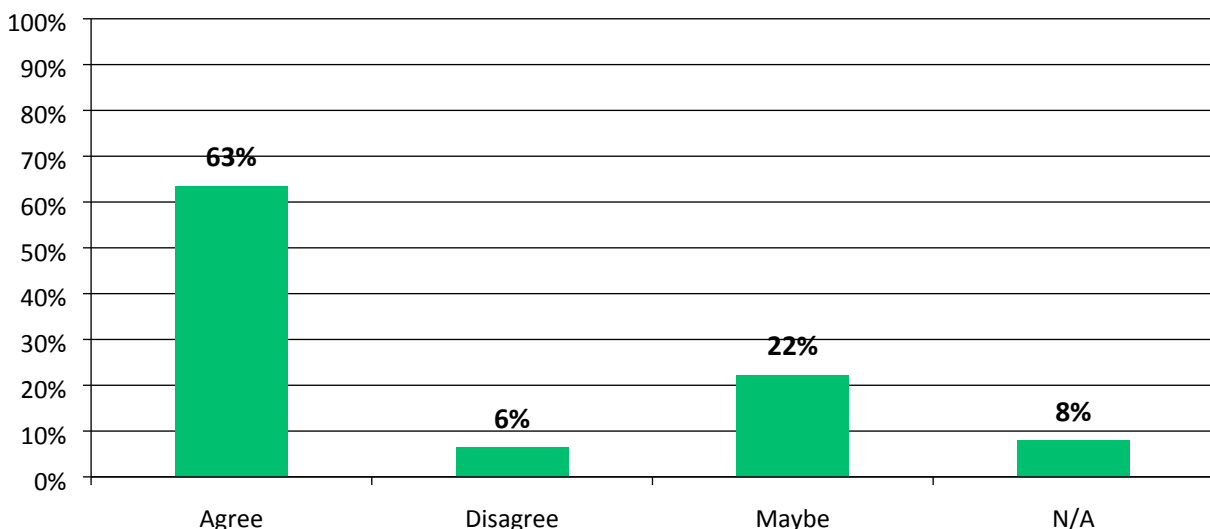
2. I support the income distinction between one bed property and properties for families.
3. Agree that if they can afford to privately rent or buy then they should be doing so, social and affordable housing stock needs to be given to those who can't afford to do so.
4. I feel social housing should help those on the lowest income as private rents are beyond their budget.

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5. The original income was low compared to the national living wage. If both parents worked full time, it would push them slightly over the limit.
6. Even on a maximum gross income of £30,000 to £40,000, sometimes this isn't enough for private rent/buying a property in this district.
7. Don't agree with the amount £30,000 for one bed need. This may stop people downsizing and freeing up family homes.
8. People earning £30,000 per annum are well able to afford to rent privately, or obtain a mortgage, so should not be able to obtain social housing.
9. £30,000 for a one bedroom need is more than ample to rent privately or affordable rent only.
10. £40,000 should be affordable rent only as that amount is higher than most people having to cope on low wages or benefits.
11. With current house prices and difficulties to get a mortgage, the minimum income is too low.
12. This will cause people to not get high-end jobs.
13. I think all benefits should be taken into account as monies going to the household as a person's wages are all counted.
14. I think £30,000 and £40,000 respectively are on the low side considering today's cost of living.
15. These income limits seem very high - maybe too generous!
16. I think the total income should include all and any benefits, not just certain ones.
17. Because of the cost of basic living is increasing sharply, maybe raising the amounts to £5k more is more realistic.
18. Again, sometimes affordability criteria are relaxed in exceptional circumstances by housing associations.

### Question 4

#### Do you agree with the proposed changes to the 'Right to Move' wording (Section 3.5)?



#### Comments:

1. I fail to understand the 'Right to Move' criteria. In my opinion, they have no real purpose that would benefit the applicant.

#### Response and actions taken:

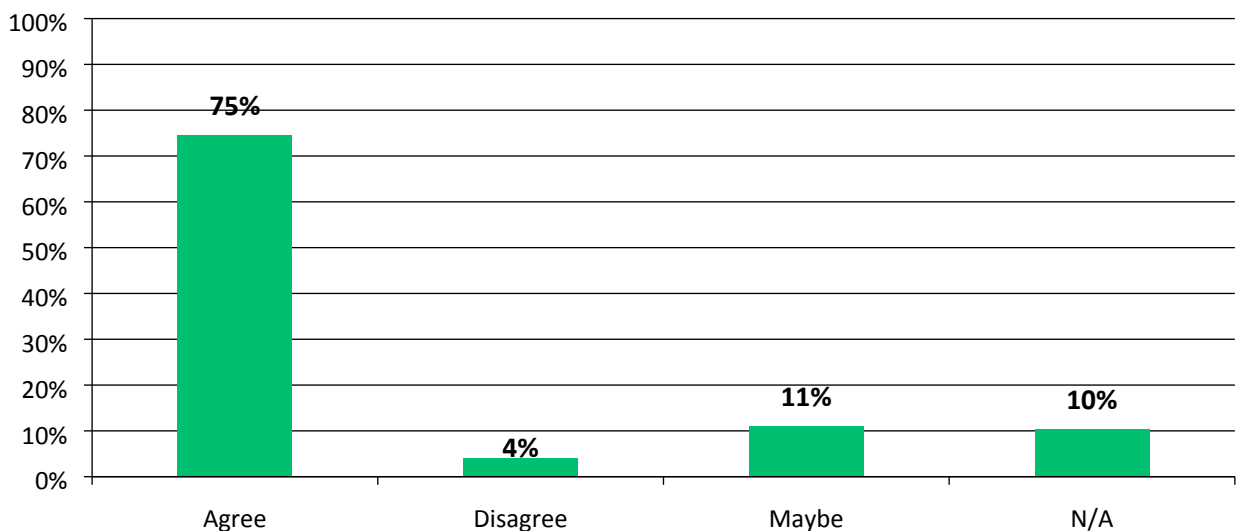
The Government's Code of Guidance states: The Government wants to increase opportunities for hardworking households. That is why we have announced an intention to

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Comments:	Response and actions taken:
	introduce a Right to Move for social tenants seeking to move to take up a job or be closer to their work, across local authority boundaries.
2. Should only be if full time work, not just for 16 hours.	Comment noted. The range of factors outlined in section 3.5 will be considered on a case-by-case basis. This section also states the work should be for at least 16 hours per week. The following wording has been added to clarify this: 'These factors will be taken into account when considering each applicant on a case-by-case basis.'
Summary of other comments:	
<p>3. To live near the workplace will help too as parking is not good in Sevenoaks District and people can use the public transport or walk to get to work.</p> <p>4. If helps keep people in employment and helps with child care etc.</p> <p>5. This is a much fairer opportunity for working families; so much of my time I could spend with my family is wasted travelling to and from work.</p> <p>6. As long as clause c is always explored and checked out before any consideration.</p> <p>7. Maybe, if the place they are looking into moving to had poor transport links.</p> <p>8. Also if the education of children will be affected. It's no good only taking childcare into consideration because it costs money.</p> <p>9. Need to move could include someone suffering ill health and needs to be near family who will help to look after them thus saving social services input.</p> <p>10. In addition, working hours should be taken into consideration alongside time taken to travel. For example, do they need to travel during peak hours or not as this will impact both time taken, and potentially cost (train).</p>	

### Question 5

#### Do you agree with the proposed changes to the Armed Forces Personnel Exemption wording (Section 4.1)?



#### Summary of other comments:

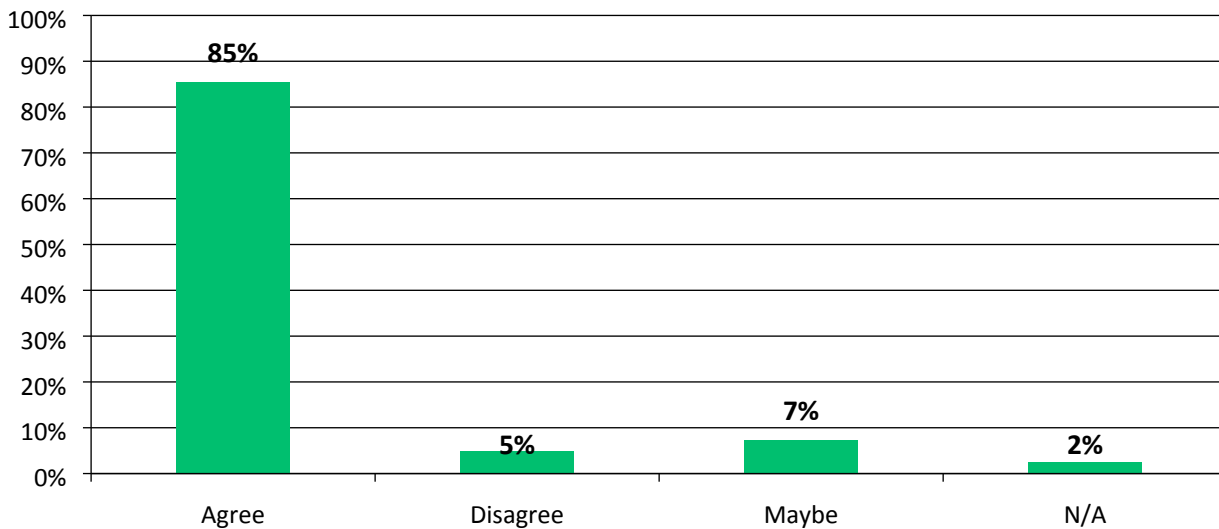
1. This policy shows a recognition of the service members of armed services have given and I support the policy of treating them and their families as local residents to help them secure housing.

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2. Their priority should not outweigh those of a greater need.
3. Armed forces personnel should be given immediate access to housing when needed as they risk their lives for us to live safely.
4. Not much medical or rehabilitation support services near here.
5. My husband is ex forces. That doesn't seem to matter to most councils.
6. Need to look after Armed Forces personnel who have contributed to the defence of this Country.

### Question 6

#### Do you agree with the proposed changes to Unacceptable Behaviour wording (Section 5.3.4)?



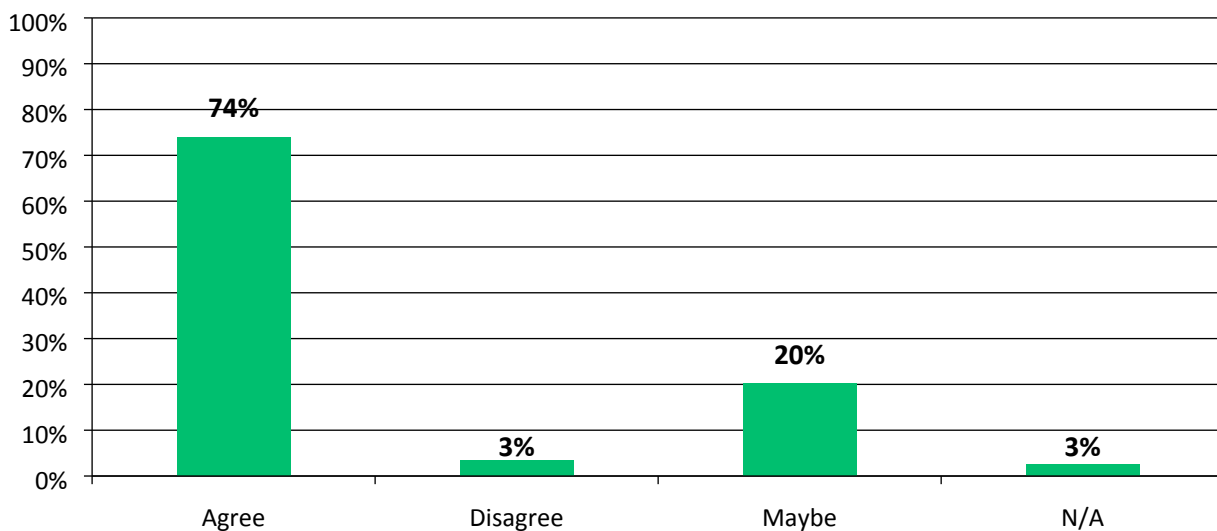
Comments:	Response and actions taken:
1. I suggest a clause that tenants need to keep their animals under control so; keeping dangerous dogs are a ground for eviction if others are put at risk.	Comment noted. Where dogs are allowed, appropriate controls are used in tenancy agreements operated by each housing provider.
2. I agree, but would like to see this inclusive of verbal abuse and verbal aggression shown towards staff members.	Comment noted. Point i) includes abuse and aggression towards members of staff. The wording has been amended to include verbal abuse and to clarify the organisations involved.
3. Ref 3.0 a and b refer to the tenancy applicant as he instead of he or she or gender neutral.	Comment noted. This wording has been amended to 'the applicant'.
4. Make domestic abuse an example of ASB to reinforce its importance.	Comment noted. Wording has been strengthened to include nuisance or annoyance to neighbours or any other persons, which includes anti-social behaviour, abuse, discrimination and harassment.
5. I agree with the bad behaviour but not the debt. Sometimes people fall on hard times and it shouldn't be held against them.	Comment noted. This section includes: 'It is important that the applicant demonstrates they are taking reasonable steps to address the debts.' It also recognises the following exception in point iv: 'except where this has been verified by the Council as being through no fault of their own. '

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6. Temporary mental health problems, bereavement, loss of job, loss of relationship. Are there no second chances?	This section states the following exception in point iv: 'except where this has been verified by the Council as being through no fault of their own.' The wording has been strengthened by adding 'This would be assessed based on supporting evidence provided by the applicant and considered on a case-by-case basis.'
<b>Summary of other comments:</b>	
<p>7. Applicants should appreciate being offered a home and good behaviour within their family and community they live in is vital.</p> <p>8. If they're not fit to be a tenant then they shouldn't be a tenant, simple. This type of housing is a privilege to the under privileged, they need to be appreciative of it or they simply don't deserve it.</p> <p>9. If they are paying off rent arrears and trying, they should have chance to reapply.</p> <p>10. Eviction also should be implemented quicker to make available to new tenants who deserve a place.</p> <p>11. Applicants should not be able to apply again if they do this sort of thing, it will happen again anti- social behaviour &amp; violence is not acceptable, one warning only it's their responsibility to keep to the rules.</p> <p>12. If people need housing then they need housing, you can't have an area deciding it will only house nice tenants.</p> <p>13. The section regarding rent arrears would need careful scrutinizing.</p> <p>14. Only if the person has made no attempt to catch up on rent arrears, sometimes people lose their job. Sometimes a crossover of new job means no income for up to 2 months. Benefits won't pay out due to new job, if they have made no attempt to rectify a situation or are entered in a payment plan then fine.</p>	

### Question 7

#### Do you agree with the proposed changes to 'Providing Applicants with Choice' (Section 7.13)?



<b>Comments:</b>	<b>Response and actions taken:</b>
1. I agree in the case of A bands, B bands however have been over allocated. These	Comment noted. This updated Allocations Policy aims to provide further clarify on

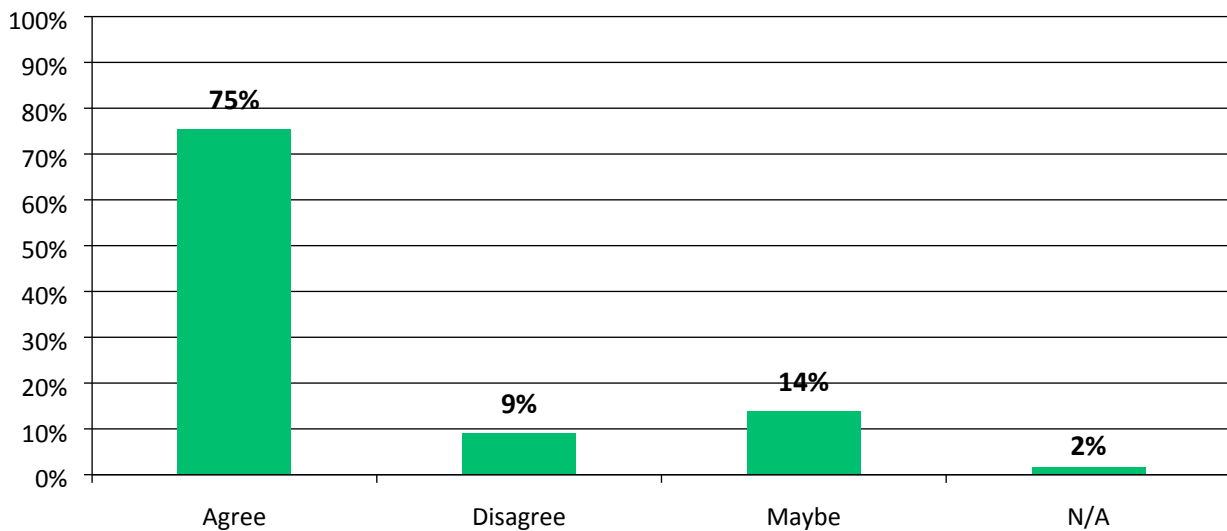


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Comments:	Response and actions taken:
bands are obvious and open abuse of the system.	banding allocations as well as ensuring that the allocation process is fair and transparent. It is important that social housing priorities those in greatest housing need.
2. This effectively removes choice from homeless people. It allows you to put them in unsuitable housing, because if they do not accept they will not be housed at all. This could be setting people up to fail.	Bids are only placed within preferred locations as selected by the applicant. The Register operates a choice based system, set out in Section 7.13. Only suitable and reasonable offers would be made, to ensure applicants are offered appropriate housing to their needs.
3. Again, I am surprised that no direct mention is given to those fleeing domestic abuse.	Commented noted. New section at 4.3 added for applicants fleeing domestic abuse or violence, outlining their priority status and exemptions to the local connection rules.
Summary of other comments:	
<p>4. Applicants who have applied for Social Housing will need to make their own research of the area, to go and see the house from the outside. Check parking, transport links, what the community offers before deciding if they want to bid for the property.</p> <p>5. It should be made clear that every effort will be made to house people locally. Failure to do this can cause mental health problems due to removal of support networks. It also makes it difficult for people to remain in employment in the local area. Wherever possible children should be allowed to remain at their own school and not have to move to a different area, unsettled children will not fulfil their potential and may disrupt the learning of others in the class.</p> <p>6. Yes, I agree as if people are in band A and are offered a property they should take it. People in Band B and band C etc. may get a chance as band C never comes out for a property on Kent home choice.</p> <p>7. Why should people have to be or become homeless, also why should certain people be put first into homes because of vulnerability when they have only just been put in an area for so called safety. They like others should wait until the people on list before them should be housed.</p> <p>8. If they are genuinely homeless, a home is Home, refuse it then get off the register.</p> <p>9. I think applicants in band A and B must evidence they are making bids on all suitable homes or risk losing their banding as applicants are currently being too picky in which areas they wish to bid on and what type of homes they would like to live in.</p> <p>10. Homeless people should have the same right to turn down property as any other person. Under these rules, your house could be unfit for habitation, meaning anyone would turn it down, but you could force a homeless person to live there.</p> <p>11. If temporary housing is a financial burden on the council, the solution is to build more council housing, not deny basic rights to our most vulnerable people.</p> <p>12. There are justifiable reasons why an offer may not be accepted this should not automatically remove you from the list maybe it's too far to walk to the local primary school and you don't own a car for example.</p> <p>13. While I agree with most of the above. I think if there's a very good reason why a place is not suitable (we don't get to see the inside of houses) so for example, say if there mould and an asthmatic looked around but couldn't take that property for health reasons then I don't think they should be punished.</p> <p>14. More consideration must be given to single people especially single males without children.</p>	

## Question 8

### Do you agree with the proposed changes to the 'Refusal of Offers' wording (Section 7.7)?



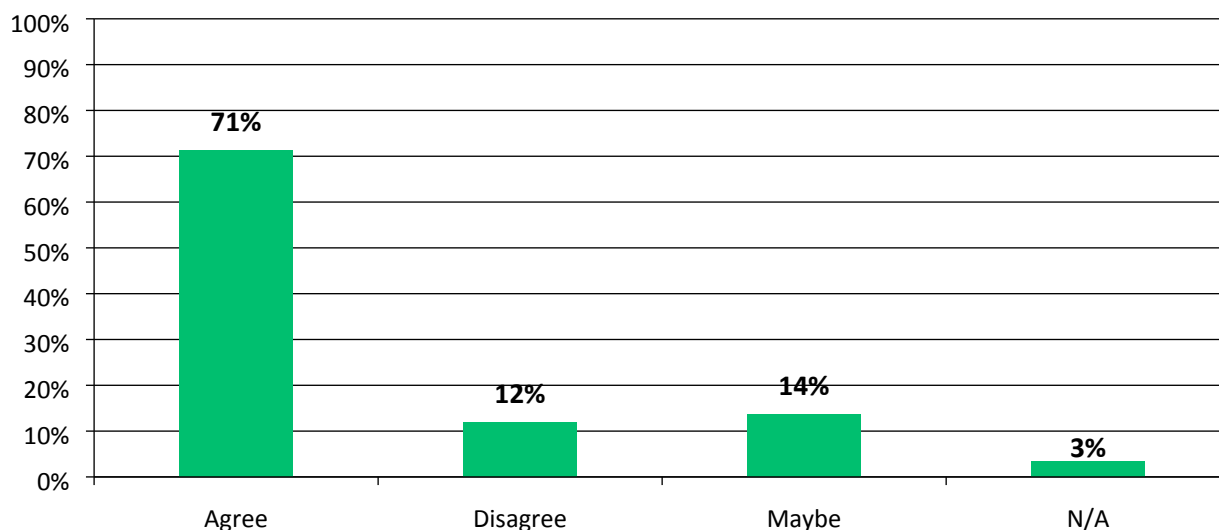
Comments:	Response and actions taken:
1. I do not agree with having a maximum offer of two homes before removing a person from the register. Applicants are only shown a photo of the outside of the house. Not all medical needs are black and white. Further information would help people choose which home they bid for and would hopefully alleviate bidders whom feel a house isn't suitable after viewing it.	Comment noted. Section 10.1 wording has been strengthened to make allowances for people with disability, housing, medical needs and to consider other exceptional circumstances.
2. As long as there is an appeal procedure.	Comments noted. An appeals process is in place, wording has been added to Section 10.1 to make this clearer.
Summary of other comments:	
<ol style="list-style-type: none"> <li>Applicants need to give good reason for refusing the offer - they placed the bid.</li> <li>Actively bidding, being responsible and taking everything into consideration when placing the bid should definitely be at the forefront of all applicants by bidding for a property. They're not genuinely interested in it wastes the time of the people who shortlist all the bids making the entire process longer meaning waiting times are extended...people need to bid responsibly.</li> <li>Yes, I agree if people aren't taking properties, they're not in their highest needs. As some people would take the first property council officers offer them.</li> <li>If genuinely homeless surely if they have no extra needs e.g. disability, then this seems fair.</li> <li>If an applicant seriously wants to live in the area and bids for properties only to then turn them down, they are preventing other genuine applicants from being considered for that property and wasting time considering their applications.</li> <li>People shouldn't even be allowed two chances.</li> <li>If a property is refused, it can easily be offered to another bidder in the queue.</li> </ol>	

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8. There is not nearly enough information on the Homechoice site to allow us to make an informed decision. No pictures of the inside. Give us more information upfront and people won't bid on unsuitable properties.

### Question 9

#### Do you agree with the proposed changes to the Banding System (Section 7.2)?



Comments:	Response and actions taken:
1. As long as medical evidence is taken into account.	Comment noted. Yes, medical priority is taken into account and detailed within Section 7.2.
2. If fleeing domestic abuse is addressed.	Comment noted. Yes fleeing domestic abuse or violence is prioritised within Band A - urgent need to move (detailed in Appendix 2).
3. I think they should have a band for working parents to encourage people to get into employment.	Comment noted. The 'Right to Move' category has been added to the banding, in line with new national Code of Guidance. This gives priority based on employment needs (detailed in Section 3.5).
4. You use the word 'normally' and I think it useful to highlight the type of exceptional circumstance that would allow someone to be treated differently to the norm.	Comment noted. The word 'normally' has been removed from Section 7.2. Wording has been amended to provide clearer definitions.

#### Summary of other comments:

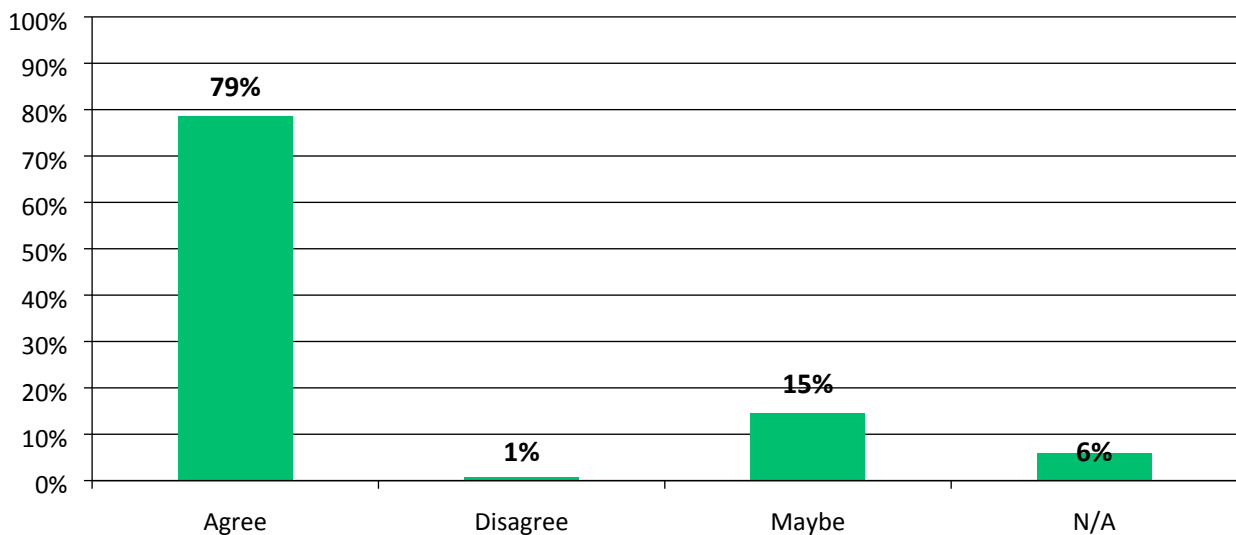
- Agree as band A should accept properties that Kent home choice offer them as gives band b and c etc. to be offered a property.
- As will help people in every band to be offered a property.
- The banding system doesn't work; you need to be homeless to understand what a lot of us go through. It doesn't take in any consideration of your mental health and what you're personally going through.
- Agree with the banding. However, I think how you decide which band people get is completely wrong.
- Placing urgent needs before medical needs is wrong. Putting those just registered before longer registered is unfair.

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10. I think consideration should be given to all aspects of the individual applicant's situation not just the highest need, they may have varying issues, which should give band plus elements of bands.
11. The proposal is to remove Band E. Removal of this band will potentially have an impact on how quickly an empty sheltered home can be let, which will cause rental loss to the housing provider and may necessitate identifying future tenants outside of the housing register.
12. Priority within a band will not always be decided by the Housing Association based on length of time.
13. Great distress has been caused to people on the waiting list when they see people in the same band being allocated housing ahead of them who have not been on the waiting list as long. It looks very unfair.
14. Don't feel bandings are always correct.

### Question 10

#### Do you agree with the proposed changes to the Homelessness and Housing Advice wording (Section 8)?

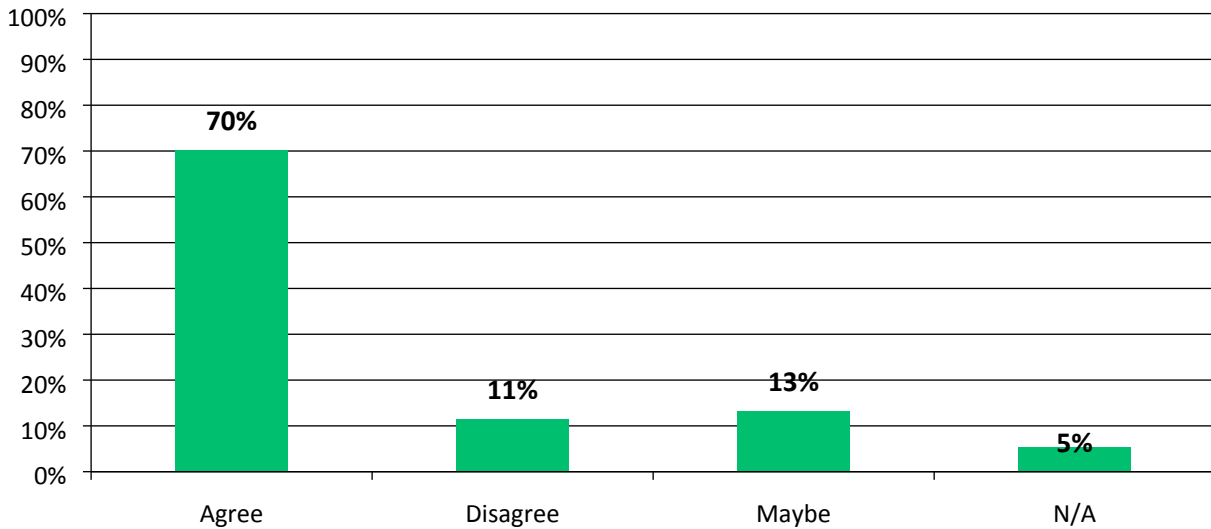


#### Summary of other comments:

1. Any advice that is beneficial to someone in need and can be given fairly and willingly is always a good thing.
2. Priority must be given to people who are currently homeless, not to people who may become homeless and homeless people.
3. It gives a clear procedure for both, the District and the applicant.
4. There are many reasons why people end up homeless it causes so much stress if the local authorities leave it until the last minute to decide if you qualify for housing. Once you receive notice, things should start to move having to move when you don't want to is stressful enough.
5. If the homeless is valid and not the parents "evicting" their children as we all know this is the best way of claiming homelessness.

**Question 11**

**Do you agree with the proposed changes to the 'Refusal of Suitable Offers' section (Section 10)?**



**Comments:**

1. As long as needs are taken into account and there is a robust appeal process.

**Response and actions taken:**

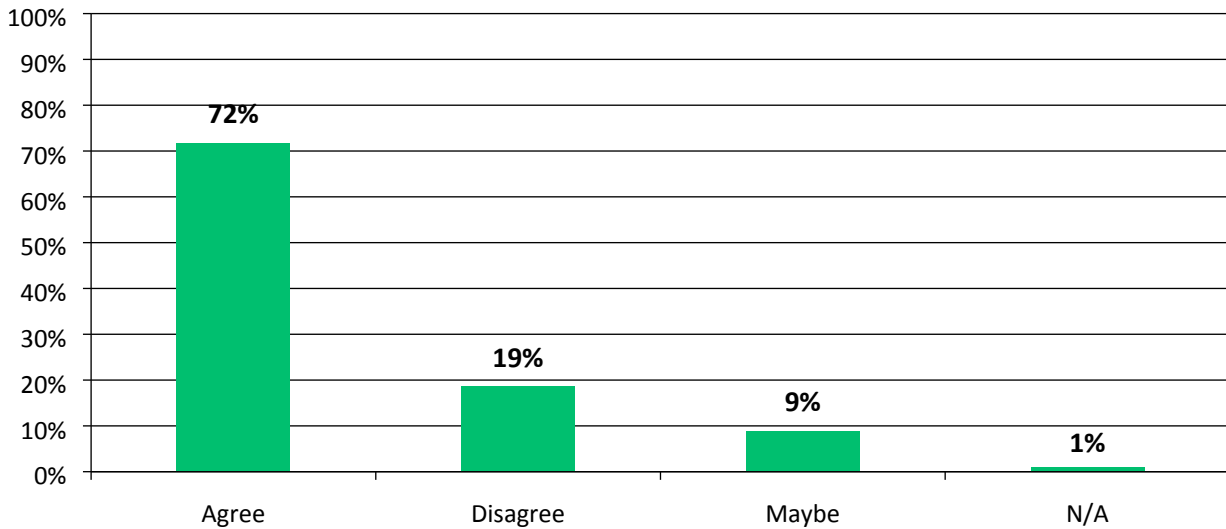
Comment noted. There is a review and appeal process in place, the wording in 10.1 has been amended to strength this wording.

**Summary of other comments:**

2. If you're homeless and offered a home, I can't think of any reason that you would refuse a property within the district that you've approached and asked for help.
3. A more common sense approach to housing needs.
4. The procedure is balanced.
5. All people should have the same right to refuse. No one should lose their place on the register because they turned down unsuitable accommodation.
6. I think two strikes even with an urgent need is fairer.
7. 12 months is harsh, 6 months exclusion is more substantial.
8. Depends on people's circumstances.
9. "Refusal of suitable offer" and "Removal from register" are two completely separate sub headings, although interlinked have very different meanings.
10. Fair enough but should be sent post not dependant totally on e-mailed as sometimes problems can occur if technology goes wrong.

## Question 12

### Do you agree with the proposed changes to the 'Failure to Bid' section (Section 10.2)?



Comments:	Response and actions taken:
1. Applicant will need to explain why they are not bidding.	Comment noted. This would be discussed with the applicant, including during the Annual Review, wording amended to make this clearer in Section 6.10.
2. In a number of cases, when a prospective applicant expresses an interest in a property, housing associations advises them to contact the Local Authority and join the register. They will often be waiting for a specific property or village, and so may not bid on anything else as a result. This can lead to them remaining on the register for some time, and running the risk of removal from that register and inability to re-join. We would hope exceptional circumstances would be considered.	Commented noted. Exceptional circumstances wording has been added to Section 10.2.
3. I can only bid when properties in the right town/area become available. The properties I am permitted to bid for are few and far between....only FIVE in the last 12 months. If no properties become available in the town in a 12 month period, then I will be unable to bid on anything. It would be extremely unfair if my application were removed from the register in this case.	Comment noted. The Register operates a Choice Based Lettings system, so any bids are placed based on the applicant's preferred locations. We will also encourage applicants to select as many locations as reasonably possible to maximise their opportunities for housing selections. All applicants would be contacted before removal to discuss the circumstances on a case-by-case basis. The wording in sections 10.1 and 10.2 has been amended to clarify this.
4. If applicant does not bid in any time period, they should be left on Housing Register without time penalty - properties offered may not be suitable.	The properties offered are based on the bids placed by that applicant, as part of the Choice Based system detailed in Section 7.13.

## Appendix A

5. Sometimes, no suitable properties are available to bid on within three months. This is because most of your properties are for over 55's, or too far away from where I work. I should not be punished because you do not have enough housing.	Comment noted. We recognise that the demand for social housing far outweighs the need. All applicants would be contacted before removal to discuss the circumstances on a case-by-case basis. The wording in sections 10.1 and 10.2 has been amended to clarify this.
6. I think the proposed 'failure to bid' is a joke. In nearly 2 years there has hardly been any properties that would be suitable for my medical needs. If I don't bid, it's because the property would not be suitable. I thought all housing register applicants had freedom of choice, hence they choose which property they bid on. Sometimes I do not see a property in the area that I need live for periods longer than 3 months. This should be looked at.	Comment noted, see response to point 3 - 5 above.
7. There may be circumstances where a person finds it hard to place a bid due to family crisis or illness or homelessness and reduced access to internet. There is no mention of what would happen in this circumstance.	Comment noted. See response to point 5 above regarding exceptional circumstances being taken into account and discussing this with applicant before they are removed.
8. You can't bid if there is not the size property or area you need so this is unfair on people and people are not always aware of this, so this is very unfair should be no time limit and should not have to re-register.	Comment noted. See response to point 5 above regarding exceptional circumstances being taken into account and discussing this with applicant before they are removed.
9. If you need a ground floor accommodation because you find it difficult to go up the stairs with bags of shopping, none of the above comes up, how can you bid?	Comment noted. See response to point 5 above regarding exceptional circumstances being taken into account and discussing this with applicant before they are removed.

### Summary of other comments:

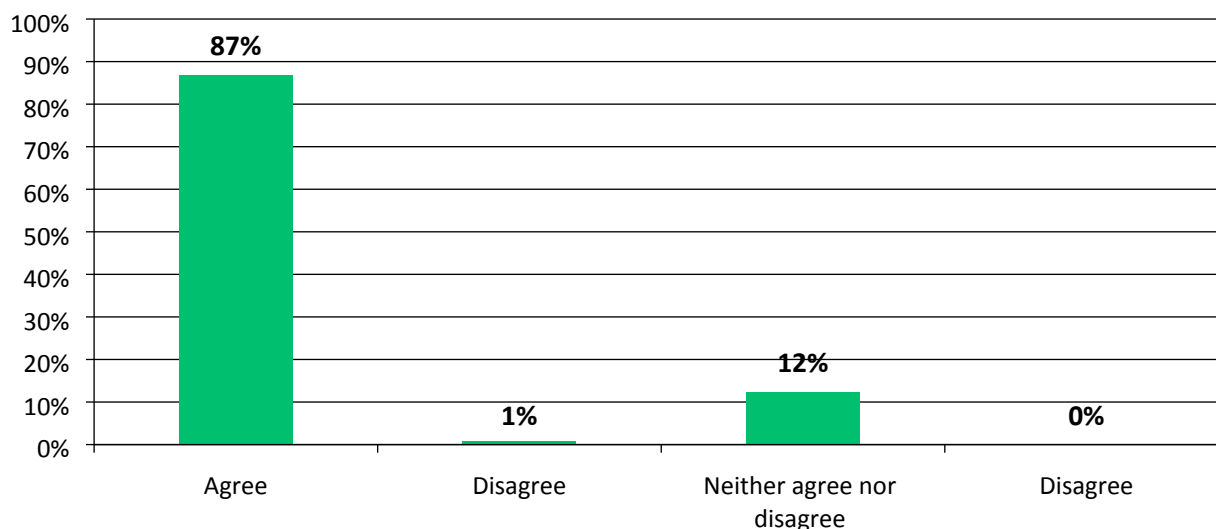
10. I support this as it stops people, not in real need, of clogging up the system.
11. I agree totally, in our circumstances we have lost out on a few properties to people in band A or B for a considerable amount of time.
12. The applicants have to be engaged. The Housing register has to become a dynamic list.
13. If the applicant is registered for a local needs property only (can only bid for local needs housing), there may not be a vacancy within the 12 month period.
14. If there are properties available which are suited to the applicant and they do not bid for them then yes. The lack of houses does mean that without the properties available bidding history can appear sparse.
15. I also feel that if given a priority, yes it should be used at any given suitable opportunity, but if the applicant is made to feel they are bidding on properties, which they're not entirely happy to, but are doing so in fear of losing their "promotion" I don't feel that's fair.
16. Allowances need to be made for victims of domestic abuse who are very likely to miss deadlines as they try and 'sort things out' with the perpetrator or blame themselves or allow themselves to be persuaded to go back into the abusive relationship. It can take many cycles of violence before the victim is truly ready to go through with a move out of area and to cut ties.
17. I don't see why a person in their 80's should bid every year. They do not know how their health is. Whilst happy in their present accommodation, in two years they may need to move. 80 year olds are not able to search the registry with ease on a computer.

## Appendix A

18. I find very little properties that I am eligible for in Swanley i.e.1 bed flat, as most that come up are for over 55's. So in a nutshell, there may be cases when no bidding has been done because no eligible properties in that area are available.
19. I do agree that a person should keep bidding to show they are looking but the new system stops you showing that if no eligible places come up.

### Question 13

#### Do you agree with the proposed changes to the 'Giving False Information' section (Section 10.3)?



#### Comments:

1. If it is a criminal offence, as well as being removed from the register, should they not also be reported to the police and potential criminal charges posed against them?

#### Response and actions taken:

Comment noted. Wording has been added to Section 10.3 to include criminal prosecution proceedings.

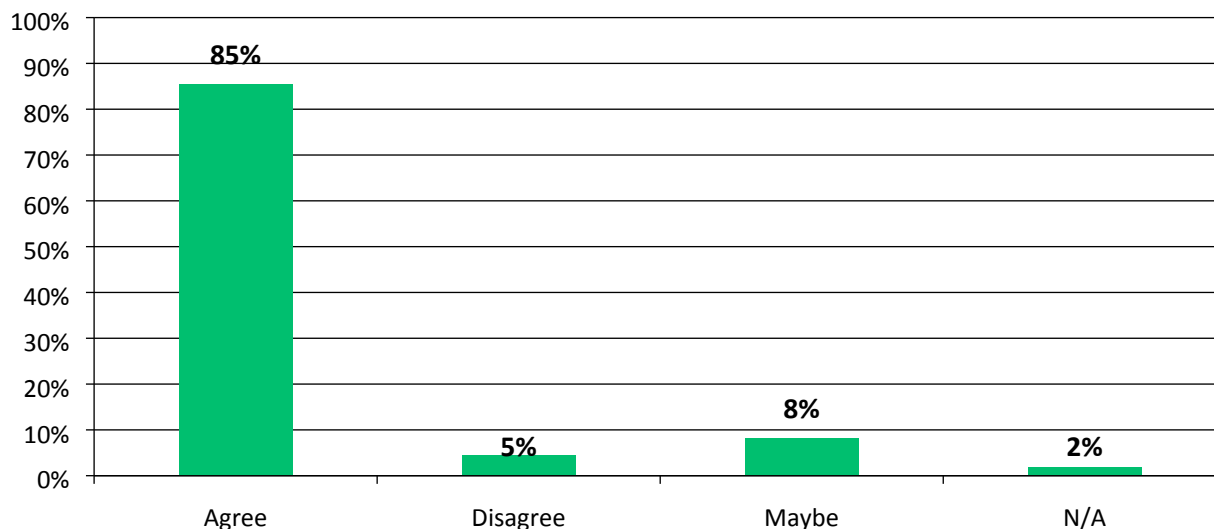
#### Summary of other comments:

2. This should be reviewed regularly.
3. Should not be allowed to go back on the register for cheating the system, and taking away chance for genuine cases no obligation to let them back in 12 months. How do you know it's not going to happen again.
4. If someone gives false information, they should be unable to re-apply forever, not just for a period of 12 months.



## Question 14

**Do you agree with the proposed changes to the 'Confidentiality' section (Section 11.1)?**

**Comments:**

1. The new data protection rules will cover this.
2. This does not comply with GDPR. People have a right to be informed about where you are sending their data and why. People should not be penalised for refusing to share information with third parties.

**Response and actions taken:**

Comment noted. Wording for the new GDPR regulations has been added to Section 11.

Comment noted. See response above in point

**Summary of other comments:**

5. Keeping confidentiality in all circumstances and the need to be forthcoming with any information outweighs the Data Protection Act. If there is a need to supply information and it's justified and serious then yes.
6. Consent to data sharing should always be optional and never result in removal from a housing register.