

Report to the Cabinet

Report reference:

C-069a-2014/15

Date of meeting:

9 March 2015



**Epping Forest
District Council**

Portfolio:	Housing	
Report of	Housing Scrutiny Standing Panel (Chairman – Councillor S Murray)	
Subject:	Review of the Housing Allocations Scheme	
Responsible Officer:	Roger Wilson	(01992 564419).
Democratic Services Officer:	Gary Woodhall	(01992 564470).

Recommendations/Decisions Required:

- (1) That, subject to both the outcome of the consultation with the Tenants and Leaseholders Federation, partner agencies, Parish and Town Councils and Registered Social Landlord Partners and the advice of the external Legal Advisor, the proposed revised Housing Allocations Scheme (attached at Appendix 3) be adopted, which includes the proposed changes set out in Appendices 1 & 2 ; and**
- (2) That, the Housing Allocations Scheme be reviewed again by the Housing Scrutiny Panel after 2 years of operation, with any resultant changes being reported to the Cabinet.**

Executive Summary:

At our meeting on 21 October 2014, we considered a report on the review of the Housing Allocations Scheme. The current Scheme came into force on 1 September 2013. As the previous review was the most comprehensive review of the Scheme ever undertaken, the Cabinet asked our Panel to review the Scheme again following 12 months of operation. Under Government Guidance, authorities are given powers to decide locally how accommodation should be allocated based upon local priorities. We therefore noted that authorities are empowered to allocate their accommodation in any way they see fit, provided schemes are both legal and rational.

The Housing Portfolio Holder, who attended our meeting, reported that he had held informal discussions with Cabinet colleagues to seek their initial views, on the 12 month review in order to give guidance to officers on how Cabinet Members felt the Scheme should be drafted, potentially saving a great deal of officer time. The Housing Portfolio Holder advised us that he had made a formal decision that, for this review, officers draft a revised Housing Allocations Scheme on the basis of the proposed principles set out at Appendix One, and that we be asked to give detailed consideration to the revised Scheme, which we have now done. Some further changes suggested to us by officers (and agreed by us) are set out at Appendix 2.

We are therefore submitting this report and a copy of the draft Scheme to the Cabinet for consideration.

We understand that, a consultation exercise will be undertaken on the draft Scheme; with the comments received being reported separately to the Cabinet by the Housing Portfolio Holder to take into account when considering and adopting the final Scheme. Furthermore, the draft revised Scheme will be referred to an external Legal Advisor being a QC specialising in housing law for consideration. Any advice given will also be reported to the Cabinet.

Reasons for Proposed Decision:

To adopt the proposed revised Housing Allocations Scheme as recommended by the Housing Scrutiny Panel, subject to the outcome of the consultation exercise and any changes made as a result of any advice provided by the external legal advisor which will be reported to the Cabinet by the Housing Portfolio Holder under the next Item on the Agenda.

Other Options for Action:

To not agree the changes to the Council's Housing Allocations Scheme recommended by the Housing Scrutiny Panel.

To agree different changes to those recommended.

Report:

1. At our meeting on 21 October 2014, our Panel considered a report on the review of the Housing Allocations Scheme. The current Scheme came into force on 1 September 2013. As the previous review was the most comprehensive review of the Scheme ever undertaken, the Cabinet asked our Panel to review the Scheme again following 12 months of operation which we have now done.

2. We were advised that the Council is legally required to have a Housing Allocations Scheme for determining priorities and the procedure to be followed in selecting a person for accommodation, or nominating a person to be a tenant for accommodation held by another Registered Provider of social housing (e.g. housing association).

3. Under Government Guidance, authorities are given powers to decide locally how accommodation should be allocated based upon local priorities. We therefore noted that authorities are empowered to allocate their accommodation in any way they see fit, provided schemes are both legal and rational.

4. The Housing Portfolio Holder advised us that he had held informal discussions with Cabinet colleagues to seek their initial views on the 12 month review. He considered this essential, as it gave guidance on how Cabinet Members felt the Scheme should be drafted, potentially saving a great deal of officer time. As a result of these informal discussions, the Housing Portfolio Holder made a formal decision that, for this review of the Housing Allocations Scheme, officers draft a Scheme on the basis of the Cabinet's proposed principles. The background on each of the issues, the initial views of the Housing Portfolio Holder, (following informal discussions with Cabinet Members) and the recommendations of our Panel are set out at Appendix 1.

5. In addition, some further minor changes suggested to us by officers (and agreed by us) are set out at Appendix 2.

6. We were asked to give detailed consideration to a Draft Scheme presented to us by

officers, which we have done and, as a result, submit this report to the Cabinet for consideration. A copy of our proposed (draft) Scheme which incorporates the proposed changes set out at Appendices 1 & 2 is attached at Appendix 3. The current Scheme and a copy of Government Guidance, Allocation of accommodation: guidance for local authorities in England (DCLG June 2012) and Providing Social Housing for Local People (DCLG October 2013) has been circulated to Cabinet Members separately for the Cabinet meeting.

7. Finally, we are suggesting to the Cabinet that an item be included in our Work Programme for 2017/2018, to review the Scheme again after 2 years of operation, and to submit a report to the Cabinet on the outcome of its review and any recommended changes, with the new Scheme coming into force on 1 April 2018.

Resource Implications:

None

Legal and Governance Implications:

Housing Act 1985

Housing Act 1996

Homelessness Act 2002

Localism Act 2011

Allocation of accommodation: guidance for local housing authorities in England (DCLG June 2012)

Providing Social Housing for local people (DCLG October 2013)

Safer, Cleaner and Greener Implications:

None

Consultation Undertaken:

A consultation exercise has been undertaken with the Tenants and Leaseholders Federation, partner agencies, Parish and Town Councils and Registered Social Landlord Partners, The comments received to the consultation exercise will be reported to the Cabinet under the next Item on the Agenda.

Background Papers:

None

Risk Management:

No risks have been identified. Should any be identified in the future, these will be reported to the Housing Portfolio Holder or the Cabinet depending upon the level of risk.

Due Regard Record

This page shows **which groups of people are affected** by the subject of this report. It sets out **how they are affected** and how any **unlawful discrimination** they experience can be eliminated. It also includes information about how **access to the service(s)** subject to this report can be improved for the different groups of people; and how they can be assisted to **understand each other better** as a result of the subject of this report.

S149 Equality Act 2010 requires that due regard must be paid to this information when considering the subject of this report.

The Cabinet are referred to the report of the Housing Portfolio Holder which is the next Item on the Agenda. This report sets out the Due Regard Record in respect of the draft revised Housing Allocations Scheme, having taken into account the outcome of the consultation exercise and the advice of the external legal advisor and can be found on page xx of the Agenda.

APPENDIX ONE – HOUSING PORTFOLIO HOLDER’S INITIAL VIEWS

The following paragraphs set out under each issue the background, the Housing Portfolio Holder’s initial views (following informal discussions with Cabinet colleagues), and the suggested recommendations of the our Panel.

(Paragraph 27 in italics below, sets out an amendment suggested by our Panel which is contrary to the Housing Portfolio Holder’s initial views).

Residency Criteria

Background

1. Under one aspect of the current Local Eligibility Criteria set out at Paragraph 14 of the Scheme, in order to join the Council’s Housing Register an applicant must have been resident in the District for 3 continuous years.

Housing Portfolio Holder’s Initial Views

2. That the Residency Criteria be increased, with any new applicant who has lived in the District for less than five continuous years immediately prior to their date of application, not qualifying for inclusion on the Council’s Housing Register;

3. That all existing home seekers (already on the Housing Register) who have lived within the District for less than 4½ continuous years immediately prior to the date the new Housing Allocations Scheme is introduced, be removed from the Council’s Housing Register; and

4. That existing home seekers removed from the Housing Register due to them not meeting the Local Eligibility Criteria should be allowed to re-register if/when they meet the new Local Eligibility Criteria, but that their Registration Date be their date of registration.

Housing Scrutiny Panel’s recommendation

5. That the Housing Portfolio Holder’s initial views be recommended to the Cabinet.

Exceptions to the Residency Criteria

Background

6. Under the current Scheme, there are exceptions to the Residency Criteria for Armed Forces Personnel, and those who have moved out of the District for less than 3 years but have lived in the District for at least 3 years before moving out of the District. In addition, applicants who are over 60 years of age (who do not meet the Residency Criteria or have a housing need) on the Supplementary Waiting List can bid on vacancies in sheltered accommodation, although home seekers on the Housing Register who have submitted bids are given priority.

7. Under the Code of Guidance, it states that authorities “may wish to consider” exceptions for those who have a “strong association” to the local area. Including:

- those with a family association

- providing protection to those escaping violence or harm
- care leavers
- existing tenants wishing to move between authorities to downsize accommodation

8. The Code of Guidance further explains that the Government wants to increase opportunities for hardworking households and are intending to introduce the “Right to Move” for social tenants who are seeking to move across boundaries to take up a job or to be closer to their work. The Guidance states “in the meantime, we expect housing authorities to make appropriate exceptions to their residency test for social tenants so as not to impede the labour market”.

Housing Portfolio Holder’s Initial Views

9. That no exceptions be made to the Residency Criteria for those who have a “strong association” with the District (subject to Paragraph 13 below), as this could lead to inconsistent decision-making;

10. That in accordance with the Government’s Code of Guidance and recent Consultation Paper “Right to Move” an exception be made to the Residency Criteria for existing social housing tenants who are seeking to move from another local authority district in England across boundaries to be closer to their work, take up a job, apprenticeship or full-time training that will lead to employment.

Housing Scrutiny Panel’s recommendation

11. That an additional Paragraph be added into the Scheme at 14.3(f) as follows:

“Are in or have secured either permanent employment comprising of a minimum of 24 hours each week or an apprenticeship or full-time work-related training, and currently live either in excess of 50 miles from their current or intended place of work; and/or their return journey time on public transport is generally in excess of 3 hours. Journey times will be based upon Internet Journey Planners”; and

In order to comply with the above, to amend Band C (i) as follows:

“All Home seekers (in accordance with Paragraph 14.3 (f) of this Housing Allocations Scheme) who need to move to be nearer to their place of work or to take up an offer of permanent employment, an apprenticeship or full-time work related training”

12. Our Panel further recommend that, should the Residency Criteria be increased to 5 years, the provision for those who have moved out of the District also be amended. It is suggested that those who have moved out of the District into settled accommodation for less than 3 years (being the current period) but have lived in the District for at least 5 years immediately before moving out of the District (in accordance with the proposed new Residency Criteria), will be treated as home seekers who have lived in the District for more than 5 years prior to application.

13. Further to representations made by Essex County Council, our Panel are recommending that if the Residency Criteria is increased to 5 years, a lesser residency requirement of 3 years be applied to those leaving care. Care leavers are mainly those who are leaving foster care having reached 18 years of age. If the 5 year residency applied to this client group, the Council would not be able to house those leaving the Single Accommodation for Epping Forest (SAFE) Scheme. By

having a lesser residency period of 3 years, this will enable the Council to continue to provide valuable support to this client group and meet with its duties under Corporate Parenting responsibilities.

Financial Criteria aspect of the Local Eligibility Criteria

Background

14. Under the current Scheme, any applicant who, in the opinion of the Council, has sufficient funds including; annual income, residential property equity, savings, shares or other assets to enable them to meet his or her housing costs will be ineligible to join the Housing Register. The thresholds at which this criterion applies is currently where;

- three times the gross annual household income including; residential property equity, savings, shares or other assets, exceeds £200,000 and the applicant qualifies for studio or 1 bedroom accommodation
- three times the gross annual household income including; residential property equity, savings, shares or other assets, exceeds £275,000 and the applicant qualifies for 2-bedroom or larger accommodation.

15. Any lump sums received, as compensation for an injury or disability sustained on active service by either, members of the Armed Forces, former Service personnel, bereaved spouses and civil partners of members of the Regular Forces, or serving or former members of the Reserve Forces, is disregarded from this criterion.

Housing Portfolio Holder's Initial Views

16. That the Financial Criteria aspect of the Local Eligibility Criteria should be substantially reduced to reflect, income and assets, residential property, equity, savings, shares or other assets, that would be required in order for any applicant to be able to secure accommodation in the private rented sector (rather than owner occupied accommodation which is the basis of the current criteria), and that officers put forward options to the Panel for consideration.

Housing Scrutiny Panel's recommendation

17. In May 2014, the DCLG issued its Guidance on Rents for Social Housing, which comes into effect from April 2015. The Guidance included Guidance on Rents for Social Tenants with High Incomes. For social tenants with high incomes, the Government allows local authorities to charge full market rents for properties let to households with an income of £60,000 per year. Authorities can choose to charge them up to full market rent. The DCLG's definition of "Households" mean tenants named on the Tenancy Agreement and any named tenant's spouse, Civil Partner or partner where they reside in the accommodation. "Income" is meant by the taxable income. Furthermore, under separate housing benefit rules, any person who has savings in excess of £16,000 is ineligible for housing benefit.

18. Our Panel recommends that the Financial Criteria limits for lead applicant/s being ineligible to join the Housing Register be based upon those set out in Paragraph 17 above and where any lead applicant/s (being those who intend to be either tenants or joint tenants) whose gross annual household income including; residential property equity, savings, shares or any other assets, exceeds £76,000

(i.e. £60,000 plus £16,000) they not qualify to join the Council's Housing Register, regardless of the size of accommodation required.

Downsizing incentive payments

Background

19. Under the current Scheme, any tenant of the Council is offered a payment to encourage them to downsize accommodation, where both properties are owned by the Council. This includes £500 for removal costs and £500 for each bedroom "released" to a maximum payment of £2,000.

20. The budget for downsizing payments and removal expenses for 2013/2014 was £44,000. During this period 41 tenants of the Council downsized to a property owned by the Council with less bedrooms. This resulted in 54 bedrooms being "released". The total amount paid in downsizing payments and removal expenses was £47,500.

Housing Portfolio Holder's Initial Views

21. That the downsizing incentive payments should be increased and the Housing Scrutiny Panel be asked to consider other options to incentivise the Council's tenants to downsize accommodation including, rent free periods in their new smaller property and increased decorations allowances.

Housing Scrutiny Panel's Options

Option One

22. That the amount paid for removal costs remains the same, as this appears to be a reasonable allowance for this purpose, but that the incentive payments for each bedroom "released" be doubled to £1,000, to a maximum payment of £3,500.

Option Two

23. That the incentive payments for each bedroom "released" be doubled to £1,000. In addition, that the amount paid for removal costs remains the same at £500, but a standard decoration allowance payment of £500 is paid by way of "Homebase" vouchers (which are around twice the full amount paid to any tenant when all rooms in a property are in need of re-decoration) subject to a maximum payment of £4,000 being made.

Option Three

24. That the incentive payments for each bedroom "released" be doubled to £1,000. In addition, that the amount paid for removal costs remains the same at £500, but a standard decoration allowance payment of £500 is paid by way of "Homebase" vouchers (which are around twice the full amount paid to any tenant when all rooms in a property are in need of re-decoration) subject to a maximum payment of £4,000 being made. Furthermore, that the tenant be offered a rent-free period of 3 months in their new smaller property.

Housing Scrutiny Panel's recommendations

25. Option Two is recommended, with the incentive payments paid for each bedroom released being increased from £500 to £1,000. In addition, that the amount paid for

removal costs remains the same at £500, but a standard decoration allowance payment of £500 is paid (which is around twice the full amount paid to any tenant when all rooms in a property are in need of re-decoration) subject to a maximum payment of £4,000 being made.

26. Rent free periods should not be granted as these would not benefit tenants who are receiving housing benefit.

27. Although our Panel supported Option Two, we were of the view that the enhanced payments over the current arrangements should only apply to tenants who were not subject to the removal of the single room subsidy (sometimes referred to as the "bedroom tax").

28. If increased incentives set out in Option Two are agreed, this is expected to result in an estimated increase in budget provision of around £68,000 making a required total annual budget of £115,500. *Further analysis has shown that the figure has been overstated; the revised figures result in a reduced estimated increase of around £51,000 making a total required budget of £98,500, this figure may reduce further if the proposal in Paragraph 27 above is agreed.*

29. The increase would need to be funded from the Housing Improvements and Service Enhancements Fund which is due to be considered by our Panel in February this year.

Penalties for refusals of offers of accommodation

Background

30. Under the current Scheme, any home seeker (apart from an existing tenant of the Council who is under-occupying and wishing to move to smaller accommodation) who refuses two offers of suitable accommodation for which they have expressed an interest within any three-month period will have their application deferred for a period of six months.

Housing Portfolio Holder's Initial Views

31. That any home seeker who refuses two offers of suitable accommodation for which they have expressed an interest within any period should have their application deferred for a period of twelve months; and

32. That any home seeker who is an existing tenant of the Council who is under-occupying and wishing to move to smaller Council accommodation who refuses three offers of suitable accommodation for which they have expressed an interest within any period, will have their application deferred for a period of twelve months.

Housing Scrutiny Panel's recommendation

33. That the Housing Portfolio Holder's initial views be recommended to the Cabinet. It is further recommended that any previous refusals by home seekers of offers of suitable accommodation be waived and not counted, from the date the new Scheme comes into force.

APPENDIX TWO

(Minor changes suggested by officers)

Paragraph No.	Change to the Scheme	Reason
1	<p>Amend – first line “...under Section 166A of the Housing Act 1996...”</p> <p>Add - last line “..... (DCLG June 2012), Providing social housing for local people: statutory guidance on social housing allocations for local authorities in England (October 2013) and other relevant legislation and Guidance”.</p>	<p>To update Act References</p> <p>To clarify that the Scheme has taken account of this recent Guidance which came into force after the last review</p>
6.3	Delete: (b) 16 and 17-year-olds owed a full housing duty by the Council under homelessness legislation	No longer required as all homeless persons are not included on the Housing Register and are dealt with under Appendix 4 of the Scheme
7.2	Amend to: “The Council recognises that there may be some exceptional circumstances concerning qualifying persons which are not covered by the Scheme. In such instances, the Director of Communities will have delegated authority to make decisions as he considers appropriate. The Director of Communities does <u>not</u> have delegated authority to decide whether there are exceptional circumstances for allowing any ineligible applicant to join the Housing Register.	To clarify that, although the Director of Communities has delegated authority to make decisions in exceptional circumstances not covered by the Scheme, this will only apply to qualifying persons.
7.5	Move this Section of the Scheme to Appendix 4 under “Other Allocations Outside of the HomeOption Scheme	To avoid any duplication and set out all allocations made outside of the Scheme in one Section.

APPENDIX TWO (Continued)

Paragraph No.	Change to the Scheme	Reason
10	Add 10.3 “When an existing tenant applies to change their sole tenancy to a joint tenancy, this will be subject to any new joint applicant meeting with the Local Eligibility Criteria of this Scheme at Paragraph 14 (apart from the Housing Need element) and all of the requirements set out in the Council’s leaflet on Joint Tenancies current at the time of application being met”.	To clarify the conditions on which a sole tenant can enter into a joint tenancy
11.1	Amend to: “Most home seekers will be given an opportunity to view the property they are being offered prior to giving the Council a decision”. Also, merge Paragraphs 11.1 & 11.2	Clarifies the process better
14.1	Amend last sentence to: “Within this Housing Allocations Scheme, those who do not meet all aspects of the criteria are classed as persons not qualifying”.	To clarify that all applicants must meet with all parts of the Local Eligibility Criteria.

APPENDIX TWO (Continued)

Paragraph No.	Change to the Scheme	Reason
<p>14.3 (a) to (d)</p>	<p>Amend to:</p> <p>14.3 “...prior to their date of registration with the exception of persons who:</p> <p>(a) are serving in the regular forces and are suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person’s service;</p> <p>(b) Formerly served in the regular forces where the application is made within 5 years of discharge;</p> <p>(c) have recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person’s spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service, or</p> <p>(d) are serving or have served in the reserve forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person’s service where the application is made within 5 years of discharge.</p> <p>The “regular forces” and the “reserve forces” have the meanings given by section 374 of the Armed Forces Act 2006</p>	<p>Section 166 A (3) of the Housing Act 1996 determines who has priority for an allocation of social housing.</p> <p>Regulations have been made by the Secretary of State. The change to the Scheme accurately reflects the amendments made in respect of the additional preference given to Armed Forces Personnel, which is worded slightly different from the provisions originally set out in the Guidance and consequently the current Scheme.</p>

APPENDIX TWO (Continued)

Paragraph No.	Change to the Scheme	Reason
14.3 (f)	Delete	No longer required as those applicants would have re-registered
Band A (vi)	Add at end of criterion “.....but not as a result of the introduction of a further household”	It is important that such priority is not given to those occupying insanitary or overcrowded housing if it is as a result of the host household moving another household into the property.
New Band B (i)	Home seekers defined as a household, who are sharing accommodation with another household, which is resulting in a lack of at least one bedroom. (Also amend numbering within this Band)	To give priority to a household sharing with another household who have been living in such circumstances for 12 months or more. This should result in the second household continuing to reside with the “host” household until they are housed and prevent homelessness in these circumstances.

APPENDIX TWO (Continued)

Paragraph No.	Change to the Scheme	Reason
Band B (iv)	<p>Amend to:</p> <p>Existing tenants of the Council:</p> <ul style="list-style-type: none"> • living in 2 or 3 bedroom flatted accommodation (including maisonettes) who meet the Local Eligibility Criteria (under paragraph 14 of the Scheme), making expressions of interest for houses that meet with their housing need <p>with their registration date being the tenancy commencement date of their current property.</p>	<p>The words “with no housing need” have been deleted. This is in order that those living in 3 bedroom flats or 2 bedroom flats who have a housing need e.g. lacking a bedroom can also benefit from their registration date being their tenancy commencement date.</p> <p>Two bullet points would be merged</p>
Band B (vi)	Delete	<p>This continued to be included in the Scheme in order that when, in very rare circumstances, homeless applicants are placed in accommodation within the Council’s stock, they should be allowed to bid on properties in order to move as soon as possible. As, those placed in the Council’s housing stock are generally given a direct offer of that property this category has proven not to be needed. It is also considered that as all other homeless applicants are no longer able to bid, all such applicants should be treated consistently.</p>

APPENDIX TWO (Continued)

Paragraph No.	Change to the Scheme	Reason
Band C (vi)	Delete	Under the old Scheme those found intentionally homeless were given low priority. Suggested this Criterion is deleted as under the current Scheme, homeless applicants are no longer included on the Housing Register.
Band B (vi)	<p>Additional category a follows:</p> <p>“Existing tenants of the Council aged over 60 years living in 1 bedroom Council accommodation wishing to move to sheltered accommodation regardless of need.</p>	To give an opportunity to a person over 60 years of age living in 1 bedroom Council accommodation to move to sheltered accommodation, thereby freeing up much needed general needs accommodation.
14.8	<p>Remove the following sentence:</p> <p>“Applicants most likely to be rejected on these grounds are those who have been evicted from a council, housing association or private rented tenancy”.</p>	This clause suggests that the Council would only exclude or remove applicants from the Housing Register who had been evicted. This prevents excluding those committing acts of serious unacceptable behaviour where the Courts may not have granted possession and problems are continuing.
14.8	<p>Remove old terminology for legal remedies and insert an additional bullet point:</p> <p>Proven offences under the Anti-Social Behaviour Crime and Policing Act 2014 or any other relevant legislation in force at any time.</p>	To set out the new powers available under the new legislation. Any persons subject to these or any other similar penalties introduced under future legislation will not qualify.

APPENDIX TWO (Continued)

Paragraph No.	Change to the Scheme	Reason
16.3	<p>Amend to:</p> <p>“.....to be made. A household is two persons or more who are intending to live together at the same property offered. Home seekers should only include persons on their application who have been part of their household for at least a 12 month period and who will occupy the accommodation offered as their only or principal home”. In respect of the Financial Criteria set out at Paragraph 14.6 of this Scheme, Household is defined as any person intended to be either tenants or joint tenants”</p>	<p>A clearer definition of “Household” Furthermore, to ensure that all applicants are permanent members of the household.</p>
16.5	<p>Amend to:</p> <p>“Required documents in respect of 16.4 above will include an original Full Birth Certificate and current Passport and any other appropriate documents as determined by the Housing Options Manager ”</p>	<p>As there is an extensive list of documents that may be required and can vary from case to case, it is better to make a broader statement. Being less specific gives the Housing Options Manager the ability to make decisions based upon the applicant’s circumstances.</p>
17.1 (f)	<p>Add (iii) how any decision about the facts of their case has been taken into account.</p>	<p>To comply with the DCLG Code of Guidance</p>
<p>Appendix 4</p> <p>1.3</p>	<p>Amend final sentence to:</p> <p>“If the offer is refused, the applicant will have the right to seek a Review of the suitability of the accommodation. If not successful, the Council’s duty under the Housing Act 1996 as amended to provide accommodation will be considered to be discharged”.</p>	<p>To clarify that applicants have the right to seek a Review of the suitability of the accommodation offered.</p>