

Item: 19

Education, Leisure and Housing Committee: 7 June 2023.

Lettings Plan.

Report by Corporate Director for Education, Leisure and Housing.

1. Purpose of Report

To consider Lettings Plan to determine the allocation targets for the allocation of Council properties.

2. Recommendations

The Committee is invited to note:

2.1.

That, following a legislative change regarding allocation of social rented housing, the Council approved a new Lettings Policy in March 2020, for implementation from 1 April 2021.

2.2.

That, although unexpected delays were experienced due to COVID-19, implementation of the Lettings Policy now requires to be progressed.

2.3.

That the Council is required, in allocating its housing, to give reasonable preference to the following groups:

- People who are homeless or threatened with homelessness.
- People living in unsatisfactory housing.
- Tenants of social landlords who under-occupy their homes.

2.4.

That a lettings plan is required in order to assign targets to different groups within the Lettings Policy.

2.5.

That Orkney has relatively small numbers of properties for allocation each year and therefore requires flexibility in its Lettings Plan.

2.6.

That, as the level of housing need is quite different between Mainland Orkney and the linked South Isles and the ferry linked isles generally, a Lettings Plan has been designed with the intention of applying separate targets to properties on mainland Orkney and the linked south isles, from those on the ferry linked isles.

2.7.

That the Lettings Plan is intended to be appropriately flexible to ensure that reasonable preference groups are prioritised followed by those otherwise in housing need.

2.8.

That, given implementation is a significant process, it is proposed that the lettings plan cover a period of two financial years, namely 2023/24 and 2024/25.

It is recommended:

2.9.

That the Lettings Plan, attached at Appendix 2, be approved for use in 2023/24 and 2024/25.

3. Introduction

3.1.

On 5 February 2020, when considering a revised Lettings Policy, the Education, Leisure and Housing Committee noted:

- That consultation on proposed changes to the Council's lettings policy was undertaken during September and October 2019, the outcome of which was reported to the Committee on 13 November 2019.
- That, should the draft Lettings Policy, attached as Appendix 1 to the report by the Executive Director of Education, Leisure and Housing, be approved, a process of implementation, as detailed in section 5.6 of the report by the Executive Director of Education, Leisure and Housing, would follow, which might result in further adjustments to the Lettings Policy in order to clarify procedures.
- That the draft Lettings Policy included a section on appeals which, if approved, would require to be reflected in the Scheme of Delegation to Officers.

3.2.

The Committee recommended:

- That the revised Lettings Policy, attached as Appendix 3 to the Minute, be approved for implementation no later than 1 April 2021.
- That the Scheme of Delegation to Officers be amended to reflect the appeals process detailed within the Lettings Policy.

4. Background

4.1.

The COVID-19 pandemic impacted negatively on the Housing Service's ability to implement a new Lettings Policy by 1 April 2021.

4.2.

The detailed process of implementation is currently underway with a view to it being implemented as swiftly as possible within the current financial year.

4.3.

A detailed action plan is being followed in order to ensure all the relevant operational steps are taken.

4.4.

Currently all housing applications held are being reassessed under the new lettings policy.

4.5.

A contract is in place with the provider of the computer system, to undertake various amendments to the database including building in the changes required by the new Lettings Policy. However, it is unlikely that this will be completed inside a suitable timescale for implementation this financial year and therefore an operational alternative will be utilised until such time as the computer system can undertake the role appropriately and it has been fully tested.

5. Letting of Council Housing

5.1.

In allocating its housing, the Council must give reasonable preference to the following groups:

- People who are homeless or threatened with homelessness.
- People living in unsatisfactory housing.
- Tenants of social landlords who under-occupy their homes.

5.1.1.

With regard to the first two cases, the applicant must have unmet housing needs that cannot be met through other options.

5.2.

Social landlords are required to publish rules on how they prioritise the allocation of houses, transfers and exchanges. The Lettings Policy contains 7 groups being:

- Group 1: Homelessness.
- Group 2: Other statutory housing needs.
- Group 3: Transfers.
- Group 4: Unsatisfactory housing.
- Group 5: Local Needs.
- Group 6: Social Needs.
- Group 7: Other.

5.3.

Within each group is a range of priority passes. An excerpt from the Lettings Policy showing the groups and priority passes is attached as Appendix 1 to this report.

6. Lettings Plan

6.1.

As part of the process of assigning targets to each housing needs group, a lettings plan required to be developed.

6.2.

This process involves a detailed assessment by area of the likely level of vacancies which may come up during the year. This requires to be compared against the level of housing need versus demand by area, within each needs group, while considering the groups that are required to be given reasonable preference as outlined in section 5.1 above.

6.3.

Orkney has relatively small numbers of properties becoming available in an average year. Care needs to be taken when making predictions as small numbers can lead to statistical distortions which cannot necessarily be predicted.

6.4.

The level of allocations is currently averaging 84 relets per annum. This is broken down to be 73 for mainland Orkney and the linked south isles and 11 for the ferry linked isles.

6.5.

Accordingly, modelling has been undertaken which takes into account the different issues faced by isles communities versus those of Mainland Orkney (including the linked South Isles). Significantly higher levels of properties on Mainland Orkney (including the linked South Isles) are allocated to those with statutory housing need, than is currently the case on the ferry linked isles. This data has not been broken down across individual communities due to the risk of distortion.

6.6.

A brief analysis has been undertaken of the number of households in the highest levels of housing need (as these will be the households who will be allocated accommodation ahead of those in lower levels of assessed housing need). Demand will be expected to outstrip supply in an average year.

6.7.

Detail has been provided regarding how properties have been allocated based on an average of the last four years. A separate calculation has been done for Mainland Orkney and the linked South Isles in comparison to the ferry linked isles. This has been compared to the levels of allocation required for the reasonable preference groups going forward.

6.8.

The target for homelessness requires to be higher than the four-year average based on Scottish Government requirements and the position of the Rapid Rehousing Transition Plan. However, there is significantly lower demand from homeless households in isles communities.

6.9.

As well as ensuring that reasonable preference is given to the groups outlined at section 5.1 above, there will also be a need to ensure it is appropriately flexible. The level of housing need in different needs groups will vary from year to year and the number of vacancies, the size of houses and the area in which they are sited will also vary. Any Lettings Plan needs to adapt flexibly to take account of this and to ensure that, regardless of the numbers of properties which become vacant, every attempt is made to address various types of housing need accordingly.

6.10.

Targets for groups 1, 2 and 3, being the reasonable preference groups have been enhanced generally. The remaining targets have been spread across groups 4, 5 and 6 more flexibly. This will allow a certain fluidity and ensure that the household who has the highest priority pass, for the longest time, with a need for the house size/type and location in question, are allocated the house.

6.11.

Given that this is the first year of operation, and the Lettings Policy will be implemented as soon as possible during the financial year, there are some additional complexities to consider while phasing in a new policy and keeping the process of property allocations running throughout. Therefore, the proposal is for the Lettings Plan to cover two financial years being 2023/24 and 2024/25.

6.12.

The allocations process for supported accommodation including sheltered and extra care housing is different from general needs housing and includes a community care need as well as a housing need. Therefore, specialist housing will not attract a target and will continue to be allocated in line with the existing policy on Housing for Particular Needs.

6.13.

Accordingly, a Lettings Plan has been developed based on an assessment of supply and demand, and is attached as Appendix 2 to this report.

6.14.

The allocation of Council housing, through the lettings plan, will be reported to the Education, Leisure and Housing Committee in March 2025, together with a revised Lettings Plan for the year ahead.

7. Equalities Impact

An Equality Impact Assessment was considered by the Education, Leisure and Housing Committee on 5 February 2020, when the Lettings Policy was presented for approval.

8. Island Communities Impact

When the Lettings Policy was approved in March 2020, the requirement to undertake an Island Communities Impact Assessment was not in place. An Island Communities Impact Assessment for the Lettings Policy has been undertaken retrospectively and is attached as Appendix 3 to this report.

9. Corporate Governance

This report relates to the Council complying with governance and procedural issues and therefore does not directly support and contribute to improved outcomes for communities as outlined in the Council Plan and the Local Outcomes Improvement Plan.

10. Financial Implications

There are no financial implications arising from this report.

11. Legal Aspects

11.1.

Allocations law originates from the Housing (Scotland) Act 1987 with revisions being introduced through the Housing (Scotland) Acts 2001 and more recently 2014.

11.2.

The Council has statutory duties in respect of involving its tenants in any decisions which affect them through the Housing (Scotland) Act 2001.

11.3.

The Housing (Scotland) Act 2014 requires that the Council consult on any proposed changes to its lettings policy and publish a report on the outcome of the consultation. It is also required to publish its rules on allocations.

12. Contact Officers

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13. Appendices

Appendix 1: Excerpt from the Lettings Policy.

Appendix 2: Lettings Plan.

Appendix 3: Island Communities Impact Assessment for Lettings Policy.

Appendix 1

5.3. Our housing groups and passes

As explained in Section Four, we have seven main housing groups. This section explains their priority and the housing passes that we award to applicants in the different groups.

In the sections below, the housing groups and the needs that each group cover are explained followed by the priority pass (or passes) that can be awarded.

Group One: Homelessness or threatened with homelessness

Homelessness

Group One is one of the three housing need groups to be given reasonable preference in allocation law when selecting tenants. We re-house people affected by homelessness through our homelessness policy, or by referring people to Orkney Housing Association Limited using our referral procedure. This is often referred to as Section Five referrals that is a reference to its legal source.

Threatened with homelessness

The terms “threatened with homelessness” refer, in law, to applicants who are likely to become homeless within two months. We seek to prevent applicants becoming homeless by providing them with detailed advice about their housing options.

Applications in this group cover applicants who:

- Are leaving institutions such as prisons.
- Live in tied accommodation.
- Are leaving HM forces.
- Applicants who are lawfully required to leave their homes in the private sector, for example, a valid notice has been served and/or the tenancy is ending and a court order is being sought.

Note

If we do not re-house such applicants before they become homeless, then their applications are dealt with through the homelessness legislation unless applicants obtain housing elsewhere.

Housing need.	Pass awarded.
Homelessness You have been accepted by Housing Services at Orkney Islands Council as being homeless and unintentionally so with a local connection/You have been accepted as homeless by another Local	Gold.

Authority and have been referred to Orkney by that other authority on the basis that you have a local connection with Orkney.	
Threatened with homelessness You have been determined as being threatened with homelessness within two months by Orkney Islands Council.	Gold.

Group Two: Other statutory housing needs

Group Two is for applicants who fall under the statutory forms of housing need that we must address, namely overcrowding and housing that is below the tolerable standard.

Note: Group Two enables us to identify housing needs that can then be dealt with to address our statutory duties. Overcrowded applications are assessed using the appropriate statutory standards.

Housing need.	Pass awarded.
Statutory overcrowding Your present home is short of one or more bedrooms as defined by the Housing (Scotland) Act 1987.	Gold.
Housing below the tolerable standard Your present home has been found to be Below the Tolerable Standard is defined in the Housing (Scotland) Act 1987 as amended. An inspection was undertaken by an Environmental Health Officer.	Gold.

Note: Properties which are not below the tolerable standard but are in a state or serious disrepair are included in group four.

Our policy is more progressive than purely statutory overcrowding and therefore we have included other passes within this area. We consider that a family that is required to use their living-room for sleeping accommodation as being overcrowded. This is different from the statutory overcrowding standard.

Housing need.	Pass awarded.
You are a household who although not statutorily over-crowded, has living arrangements which are causing difficulties arising from congestion. For example a family of four occupying a one bedroom property which has caused condensation and resultant health issues or a family unit are forced to live apart due to unsatisfactory/overcrowded housing.	Silver.
You require two or more bedrooms but occupy accommodation in which you are required to share kitchen or bathroom facilities with people who are not members of your household. You are part of a couple who have separated but continue to share a property.	Bronze.

Group Three: Transfers by Scottish secure tenants

Group Three is for our tenants who want to move to other Orkney Islands Council housing.

They are awarded passes for the following housing needs.

Housing need.	Pass awarded.
Under-occupation Your present home has one or more bedrooms more than you require. Moving to a smaller property would allow a larger property to be made available for a family (this only applies to tenants of the Council or Orkney Housing Association Ltd).	Gold.
Transfers Transfer applications will be prioritised where applicants are living in unsatisfactory housing conditions and have unmet housing needs in accordance with allocations law. Any priority pass will be awarded through the relevant group. In situations where a transfer application evidences no housing need,	Bronze.

<p>a bronze priority pass will be awarded. This is to assist us to make the best use of our stock and also mainstreaming the principle of choice.</p>	
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This group consists of applicants that are already tenants of housing provided by the Council. These applicants may need to move either to larger or smaller properties, to a different type of property or to a different area.

Group Four: Unsatisfactory housing.

Group Four is for applicants living in unsatisfactory housing. They are awarded passes for the following housing needs.

Housing need.	Pass awarded.
<p>Accessibility/medical</p> <p>Your present home is completely unsuitable for your (or a member of your household's) medical condition. The quality of someone within the household's life is seriously limited and would be greatly improved by moving to more suitable accommodation. Urgent action is recommended.</p>	<p>Gold.</p>
<p>You or a member of your household has a serious medical condition which would be improved by moving to more suitable accommodation.</p>	<p>Silver.</p>
<p>You or a member of your household has a medical condition which would be improved by moving to more suitable accommodation, but rehousing is not urgently required.</p>	<p>Bronze.</p>
<p>Serious Disrepair</p> <p>You live in housing which you or another member of your household own or rent from a private sector landlord which although not Below the Tolerable Standard, is in a state of serious disrepair, as determined by an Officer of the Council's Environmental Health Team and Housing Services is satisfied on the basis of evidence provided to it that the repairs are uneconomical or impractical. This may include evidence</p>	<p>Silver.</p>

from the Council's Building Control Section.	
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Group Five: Local needs

Group Five is intended to address local needs and to prevent homelessness occurring.

At present we have no negotiated Local Lettings Initiatives in place. However, appendix three outlines our processes for considering Local Lettings Initiatives.

Housing need.	Pass awarded.
<p>Applicants moving to address specific needs whether these are medical, support, employment related needs.</p> <p>You need to move into a given area as you have a medical/psychological need and require to access specialist services.</p> <p>You wish to move into a given area for community or social reasons for example to stimulate local employment or you need to remain in that area for the same reasons.</p> <p>You wish to move into a given area to give or receive support to/from a relative.</p> <p>You wish to move into a given area for employment reasons as detailed below. Alternatively you need to remain in that area for the reasons given above.</p>	Silver.
<p>Applicants in tied accommodation provided by their employers but are required to leave due to health, unemployment or retirement reasons.</p>	Silver.
<p>People who are living in insecure accommodation</p> <p>Applicants who have been served with valid notice to quit. Notice must be assessed by Housing Services to confirm validity.</p> <p>Applicants whose landlord has been refused registration or had their registration revoked under private sector landlord registration procedures.</p>	Silver.

<p>Applicants who are subject to repossession action by their mortgage lender or other creditors with an interest in the property. Case should be investigated by Housing Services to identify most appropriate housing option.</p> <p>Applicants who have been served with valid notice to quit on conduct grounds. Notice must be assessed by the Homelessness and Advice Section of Housing Services to confirm validity.</p>	
<p>Applicants who have a short-term tenancy i.e. short assured tenancy. Tenancy agreement must be assessed by Homelessness and Advice Section of Housing Services to confirm validity.</p> <p>Applicants who are lodging with a resident landlord/subtenant (this includes sub-tenants of Council tenants).</p> <p>Applicants who are living in a hostel or a House in Multiple Occupation.</p>	Bronze
<p>Service personnel who can establish a local connection with Orkney.</p> <p>Service personnel who can establish a local connection with Orkney, leaving the services. (Time limited to two years from discharge).</p>	Silver.
<p>People who are living with parents/guardians and wish to live independently (emergent households).</p>	Bronze.
<p>People with urgent/emergency housing needs for other housing.</p> <p>This is awarded in exceptional circumstances where the existing housing situation is seriously affecting the wellbeing of the applicant or members of the household.</p> <p>The allocation of a platinum pass should be considered by the Executive Director of Education, Leisure and Housing and the Head of Housing, Homelessness and Schoolcare Accommodation Services and be informed by the Service Manager (Housing and Homelessness) and the Team Leader</p>	Platinum.

(Housing and Homelessness) to ensure they have all necessary information.	
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Where applicants who are living in insecure accommodation have received a valid notice to quit and a court order is being sought, and therefore homelessness is threatened within two months, we will address it through our homelessness procedures.

Group Six: Social needs

Group Six is intended to address social needs and to prevent homelessness occurring.

Housing need.	Pass awarded.
<p>People affected by relationship breakdown</p> <p>Forced sale and division of matrimonial home where partner determines to sell the home of the partner with principal responsibility for the children.</p>	Silver.
<p>Awarded in the case of relationship breakdown to the parent with least access to the dependent children of the union.</p> <p>N.B. Applicants awarded priority in this category will be restricted to a two bedroom property regardless of the number of dependent children. (This refers to access arrangements specifically rather than to children who are permanently part of a household on a full-time basis).</p>	Bronze.
<p>People required to move house for financial reasons</p> <p>Applicants whose current accommodation is not affordable. See note below.</p>	Gold.
<p>Two tenancies for one</p> <p>An applicant, who is an existing Orkney Islands Council tenant, wishes to be housed with another Orkney Islands Council tenant or a tenant of Orkney Housing Association Limited.</p>	Gold.
<p>Young people leaving care</p> <p>Applicants who are entitled to throughcare/aftercare support and who</p>	

are leaving care. (Please also see our Protocol on Housing and Young People Leaving Care)	
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Note: Applicants affected by harassment or relationship breakdown could also be homeless in law and options are discussed with applicants, as appropriate.

The term “dependent children” is defined on page 17.

Group Seven: Other

If an applicant lives outside of the Orkney Islands Council area and does not meet the criteria explained above, then the application is placed in Group Seven.

For example, if an applicant from elsewhere in Scotland simply wants to live in Orkney, then their application would be placed in this group. If the applicant was coming to work in Orkney, though, their application would be placed in one of the other groups based on their housing needs.

Priority passes are added for each housing need factor so that applicants with more housing needs in Group Seven would receive priority.



Lettings Plan

April 2023

Version Control

Document Reference.	Rev.	Issue date.	Reason for issue.	Reviewer.
HDPOL 139.	Draft.	02/05/2022.	New.	Head of Community Learning, Leisure and Housing

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This document can be made available in a range of formats and languages on request.

Section 1 - Introduction

What is a lettings plan?

Lettings plans are based on supply and demand analysis and take account of specific local needs and circumstances.

On an annual basis, each area letting plan sets out:

- The target of lets to each of 7 groups within the lettings policy.
- Any local lettings initiatives.

Why do we need a lettings plan?

The lettings plan provides an open and transparent framework for us to set out in advance how we intend to let houses to best meet the aims and objectives of our lettings policy.

Housing law requires that we give “reasonable preference” to certain groups in the allocation of social housing and this is as follows:

- People who are homeless or threatened with homelessness.
- People living in unsatisfactory housing.
- Tenants of social landlords who under-occupy their homes.

Our lettings policy ensures that applications are assessed and priority passes are awarded accordingly. The lettings plan assesses the proportion of housing that should go to each needs group as a result.

Appendix 1 shows how we have allocated housing over the last 4 financial years.

How is the new lettings policy being phased in?

This will be our first year of allocating Council properties using a new lettings policy. It is being implemented part way through the financial year due to delays resulting from COVID-19. Accordingly, there is a need to compare allocations in previous years with plans for future years so we can manage the transition smoothly to ensure a level of continuity while responding to changes in legislation. The lettings plan will cover two financial years as a result (2023/24 and 2024/25).

Orkney has relatively small numbers of properties becoming available in an average year. Care needs to be taken when making predictions as small numbers can lead to statistical distortions which cannot necessarily be predicted.

Accordingly, modelling has been undertaken which takes into account the different issues faced by communities in ferry linked isles versus those of mainland Orkney (including the linked south isles). Significantly higher levels of properties on mainland Orkney (including the linked south isles) are allocated to those with statutory housing need, than is currently the case on the ferry linked isles. We have not broken this data down across individual communities due to the risk of distortion.

Our Local Housing Strategy is underpinned by a detailed Housing Need and Demand Assessment which provides more detailed modelling across different communities and property types.

Are there additional factors that need to be taken into account?

Statistical modelling within this lettings plan, includes a broad range of data which was already established, specifically the detail of housing applications already registered and assessed. There was also the potential for change in relation to the following:

- New housing applications being received particularly from households with statutory housing need and a requirement to live in this community.
- Suspension of the local connection criteria within the homelessness legislation (from November 2022).
- The Homes for Ukraine Scheme where households welcome Ukrainian refugees within their own homes. Should these arrangements break down, or when they come to an end, there will be an impact on statutory housing need in Orkney as the Council would require to house the household concerned.

Section 2 – Lettings targets 2023/24 and 2024/25

Turnover of Council properties

In any year, only a small proportion of properties became available to let. Detailed data for the last four years is attached at Appendix 1.

Anticipated Availability of Council properties

From 1 April 2022 to 31 March 2023, we let a total of 69 general needs properties on mainland Orkney or the linked south isles. This included 8 newly built properties.

While our Strategic Housing Investment Plan includes a range of new build projects and specifically 14 social housing units to be under development as Council housing, during financial year 2023/24, as well as seeking 45 design and build properties, we do not anticipate there being any completions this financial year. We would expect at least 14 units of social housing to become available in 2024/25. There is some uncertainty around the outcomes of the design and build contracts meantime.

Taking into account the average number of vacancies over the last four years, we estimate that we will have approximately 84 properties to let. This is broken down as follows:

- Approximately 73 across mainland Orkney or the linked south isles (86.9%);
- Around 11 in the ferry linked isles (13.1%).

Given that the numbers are relatively small, forecasting has not been more specific than that outlined above, as this may introduce higher levels of uncertainty around the accuracy of predictions.

The property size and location can have a significant impact on whether specific types of housing need can be met. For example, many homeless households require a smaller property in either Kirkwall or Stromness, if larger properties in rural mainland (including the linked south isles) or ferry linked isles locations are over-represented in relation to the modelling, this may impact on the ability to meet a target appropriately.

Section 3 – Supply and demand analysis for properties

At 11 April 2023, the number of households on the waiting list was 1142 and of those, 329 had a priority pass.

Of the 1142 households on the waiting list, 343 were applications from outwith Orkney, of which 25 could evidence a need to live in Orkney.

An assessment of data on the waiting list, relating to those households who hold the highest levels of priority pass, being platinum and gold, shows the following:

Group	Housing Need.	Number with Platinum or Gold Priority Pass – Mainland Orkney and Linked South Isles.	Number with Platinum or Gold Priority Pass – Ferry Linked Isles.
Group 1.	Homelessness.	56.	1.
Group 2.	Other Statutory Need (gold priority passes include for statutory overcrowding; housing below the tolerable standard. Silver or bronze priority passes cover non-statutory (policy) overcrowding and unsatisfactory living arrangements).	48 (overcrowding).	8
Group 3.	Transfer (under-occupation).	16.	1.
Group 4.	Unsatisfactory Housing (accessibility / medical needs; serious disrepair etc).	Medical 3.	0.
Group 5.	Local Needs (specific need to live in the community due medical, support, employment related needs, this group includes platinum priorities ie urgent housing need).	Urgent Need 3.	0.
Group 6.	Social Needs (relationship breakdown,	Corporate parenting 3.	0.

Group	Housing Need.	Number with Platinum or Gold Priority Pass – Mainland Orkney and Linked South Isles.	Number with Platinum or Gold Priority Pass – Ferry Linked Isles.
	financial issues, young people leaving care)		
Group 7.	Other (groups who cannot evidence housing need but who wish to be housed within Orkney).	N/A.	N/A.
Total		129.	10.

The data above represents a snapshot in time and over the course of the current financial year, more households will join the waiting list with a platinum or gold priority pass.

Given that the data regarding the number of properties we would expect to have available to allocate, shows this to be in the region of 84 and the current figures for the highest levels of housing need highlighted above indicates 139, there is a lack of supply to meet demand within the next financial year.

Please note, the figures relate to the highest level of housing need only and households with a silver or bronze priority pass or those who cannot evidence housing need but who wish a council house, have not been included in these figures.

In relation to homelessness, it would be expected that Orkney Housing Association Ltd would assist with the provision of some properties to meet this need. In addition, given that we operate a common housing register and therefore combined waiting list, we would expect that some households would be housed by Orkney Housing Association Ltd over a similar time period. While both organisations operate different allocations policies, the legislation underpinning this is the same and therefore the expectation is that households evidencing a high level of housing need under the Council's policy would also be well placed in relation to Orkney Housing Association's criteria.

In the event that all households with the highest levels of housing need were adequately housed and additional properties became vacant, they would be allocated to households with silver priority passes in the first instance.

Properties have been allocated over the last four years (most recent year at top) on the following basis:

Group.	Housing Need.	Percentage of Lets – mainland Orkney and Linked South Isles.	Percentage of Lets – Ferry Linked Isles.
Group 1.	Homelessness.	42% based on 3 year average but that won't be enough re RRTP. 37/69 (53.6%). 71/110 (64.5%). 23/53 (43.4%). 22/62 (35.5%). Total 49.3%	2.8% based on a 4 year average. 4/11 (36.4%). 1/8 (12.5%). 0/14 (0%). 0/10 (0%). Total 12.2%.
Group 2.	Other Statutory Need (gold priority passes include for statutory overcrowding; housing below the tolerable standard. Silver or bronze priority passes cover non-statutory (policy) overcrowding and unsatisfactory living arrangements).	Overcrowding: 14/69 (20.3%). 13/110 (11.8%). 13/53 (24.5%). 19/62 (30.6%). Total 21.8%. Unsatisfactory living arrangements: 1/69 (1.45%). 1/110 (0.9%). 1/53 (1.9%). 2/62 (3.2%). Total 1.9%. Unsatisfactory housing: 0 /69 (0%). 0/110 (0%). 0/53 (0%). 2/62 (3.2%). Total 0.8%. Overall total 24.5%.	Overcrowding: 0/11 (0%). 2/8 (25%). 2/14 (14.3%). 2/10 (20%). Total 14.6%. Unsatisfactory living arrangements: 0/11 (0%). 1/8 (12.5%). 0/14 (0%). 1/10 (10%). Total 5.6%. Unsatisfactory housing: 0/11 (0%). 0/8 (0%). 0/14 (0%). 0/10 (0%). Total 0%. Overall Total 20.2%.
Group 3.	Transfer (under-occupation).	Under-occupancy: 0/69 (0%). 2/110 (1.8%). 3/53 (5.7%). 3/62 (4.8%). Total 3.1%.	Under-occupancy: 0/11 (0%). 0/8 (0%). 1/14 (7.1%). 0/10 (0%). Total 1.8%.

Group.	Housing Need.	Percentage of Lets – mainland Orkney and Linked South Isles.	Percentage of Lets – Ferry Linked Isles.
Group 4.	Unsatisfactory Housing (accessibility / medical needs; serious disrepair etc).	Medical: 3/69 (4.3%). 2/110 (1.8%). 2/53 (3.8%). 2/62; (3.2%). Total 3.3%.	Medical: 0/11 (0%). 1/8 (12.5%). 1/14 (7.1%). 0/10 (0%). Total 4.9%.
Group 5.	Local Needs (specific need to live in the community due medical, support, employment related needs, insecurity of tenure, emergent households, this group includes platinum priorities i.e. urgent housing need).	Platinum: 2/69 (2.9%). 5/110 (4.5%). 0/53 (0%). 2/62 (3.2%). Total 2.7%. Specific need: 5/69 (7.2%). 5/110 (4.5%). 2/53 (3.8%). 4/62 (6.5%). Total 5.5%. Insecurity of tenure: 1/69 (1.4%). 1/110 (0.9%). 1/53 (1.9%). 0/62 (0%). Total 1.1%. Emergent households: 0/69 (0%). 3/110 (2.7%). 0/53 (0%). 2/62 (3.2%). Total 1.5%. Overall Total 10.8%.	Platinum: 0/11 (0%). 1/8 (12.5%). 0/14 (0%). 0/10 (0%). Total 3.1%. Specific need: 3/11 (27.3%). 2/8 (25%). 1/14 (7.1%). 1/10 (10%). Total 17.4%. Insecurity of tenure: 0/11 (0%). 0/8 (0%). 1/14 (7.1%). 0/10 (0%). Total 1.8%. Emergent households: 0/11 (0%). 0/8 (0%). 0/14 (0%). 0/10 (0%). Total 0%. Overall Total 22.3%.
Group 6.	Social Needs (relationship breakdown,	Corporate parenting: 1/69 (1.4%). 2/110 (1.8%).	Corporate parenting: 0/11 (0%). 0/8 (0%).

Group.	Housing Need.	Percentage of Lets – mainland Orkney and Linked South Isles.	Percentage of Lets – Ferry Linked Isles.
	financial issues, young people leaving care).	3/53 (5.7%). 0/62 (0%). Total 2.2%. Relationship breakdown: 0/69 (0%). 0/110 (0%). 0/53 (0%). 1/62 (1.6%). Total 0.4%. Overall total 2.6%.	0/14 (0%). 0/10 (0%). Total 0%. Relationship breakdown: 0/11 (0%). 0/8 (0%). 1/14 (7.1%). 0/10 (0%). Total 1.7%. Overall Total 1.7%.
Group 7.	Other (groups who cannot evidence housing need but who wish to be housed within Orkney).	No priority: 6/69 (8.7%). 5/110 (4.5%). 5/53 (9.4%). 3/62 (4.8%). Total 6.9%. This group is about the properties which are left without demand from groups in housing need, so won't be assigned a target.	No priority: 4/11 (36.3%). 0/8 (0%). 7/14 (50%). 6/10 (60%). Total 36.6%.
Total		100.5%	99.7%

Size of properties available

The breakdown of size of council properties that became available for let from April 2022 to 31 March 2023 was:

Size of properties	
% of general needs properties were 1 bedroom.	48%.
% of general needs properties were 2 bedroom.	30%.
% of general needs properties were 3 bedroom.	22%.
% of general needs properties were 4+ bedroom.	0%.

Size of properties required for those with platinum or gold priority passes

The size of council properties required for households that the highest level of housing need was:

Size of properties	
% of households who needed properties with 1 bedrooms.	53%.
% of households who needed properties with 2 bedrooms.	17%.
% of households who needed properties with 3 bedrooms.	12%.
% of households who needed properties with 4+ bedrooms.	18%.

Housing legislation requires that we “give reasonable preference” to groups 1, 2 and 3. We require to increase the target for homelessness based on the Scottish Government’s priority relating to homelessness and the requirements of the Rapid Rehousing Transition Plan. Group 3 has been modelled on “under-occupancy” only but our lettings policy now also attaches greater priority to transfers to allow us to make the best use of our stock therefore we would wish to increase this target.

Further to this we wish to ensure flexibility to allow those with the highest levels of housing need in groups 4, 5 and 6 to also have a reasonable target for rehousing. Therefore, based on our analysis of supply and demand for the previous 4 years, lettings targets for properties have been set for 2023/24 and 2024/25 against the seven housing groups within our lettings policy. These are as follows:

Group.	Housing Need.	Percentage of Lets – Mainland Orkney and Linked South Isles.	Percentage of Lets – Ferry Linked Isles.
Group 1.	Homelessness.	60%.	20%.
Group 2.	Other Statutory Need (gold priority passes include for statutory overcrowding; housing below the tolerable standard. Silver or bronze priority passes cover non-statutory (policy) overcrowding and unsatisfactory living arrangements).	20%.	20%.
Group 3.	Transfer (under-occupation).	10%.	10%.

Group 4.	Unsatisfactory Housing (accessibility / medical needs; serious disrepair etc).	Remaining 10% split across groups 4, 5 and 6.	Remaining 50% split across groups 4, 5 and 6.
Group 5.	Local Needs (specific need to live in the community due medical, support, employment related needs, insecurity of tenure, emergent households, this group includes platinum priorities i.e. urgent housing need).	Remaining 10% split across groups 4, 5 and 6.	Remaining 50% split across groups 4, 5 and 6.
Group 6.	Social Needs (relationship breakdown, financial issues, young people leaving care).	Remaining 10% split across groups 4, 5 and 6.	Remaining 50% split across groups 4, 5 and 6.
Group 7.	Other (groups who cannot evidence housing need but who wish to be housed within Orkney).	No target assigned – this is about properties being allocated where there is no one designated as being in housing need who requires that property.	No target assigned – this is about properties being allocated where there is no one designated as being in housing need who requires that property.
Total		100%	100%

Section 4 – Housing options advice and information to applicants

Both the Council and Housing Association in Orkney have a limited supply of properties available for let every year. This means that many applicants on the housing waiting list are unlikely to receive an offer of housing.

Depending on their individual circumstances and preferences, applicants may wish to consider other available housing options. There is a range of information, and advice available to help applicants make informed choices about their housing needs, including:

- Lettings plan which provides details of Council properties including turnover in each area.
- Mutual exchange information for existing council and housing association tenants.
- Information on removal grant scheme for tenants of council and housing association properties who are under occupying their homes.
- Assistance to remain at home, including carrying out adaptations to meet specific needs.
- Low cost home ownership options.
- Help with paying rent and council tax.

There are also a range of services available from the Council and other agencies which offer housing related information and advice including:

- Money advice service.
- Mediation services.
- Social Work Services.
- Citizen's Advice Bureau.
- Care and Repair.

The Council's website www.orkney.gov.uk provides additional information and advice on housing options and the above services.

Section 5 – Monitoring our Performance

We closely monitor letting outcomes to ensure the plan delivers the aims of our lettings policy and if necessary, revise the letting targets for the year ahead.

On an annual basis, we report our performance to the Education, Leisure and Housing Committee and at the same time seek approval for the following year's targets.

We will publish details of our performance each year on the Council's website.

Appendix 1 – Data on Housing Allocations (4 Financial Years)

During 2022/23 the Council had 80 vacancies to fill, which were allocated as follows:

- 41 Homeless Households (27 Kirkwall, 5 Stromness, 5 Mainland, 4 Isles).
- 2 Emergency Platinum (2 Kirkwall).
- 3 Medical (2 Kirkwall, 1 Stromness).
- 14 Overcrowding (7 Kirkwall, 2 Stromness, 5 Mainland).
- 0 Under-occupancy.
- 1 Corporate Parent (1 Kirkwall).
- 8 Specific Need to be in the Community (2 Kirkwall, 2 Stromness, 1 Mainland, 3 Isles).
- 1 Unsatisfactory Living Arrangements (1 Kirkwall).
- 0 Relationship Breakdown.
- 1 Insecurity of Tenure (1 Stromness).
- 0 Emergent households.
- 10 No Priority (1 Kirkwall, 2 Stromness, 3 Mainland, 4 Isles).

During 2021/22 the Council had 118 vacancies to fill, which were allocated as follows:

- 72 Homeless Households (48 Kirkwall, 17 Stromness, 6 Mainland, 1 Isles).
- 6 Emergency Platinum (3 Kirkwall, 1 Mainland, 1 Isles, 1 Stromness).
- 3 Medical (2 Kirkwall, 1 Isles).
- 15 Overcrowding (10 Kirkwall, 1 Stromness, 2 Mainland, 2 Isles).
- 2 Under-occupancy (2 Mainland).
- 2 Corporate Parent (2 Kirkwall).
- 7 Specific Need to be in the Community (3 Kirkwall, 1 Mainland, 2 Isles, 1 Stromness).
- 2 Unsatisfactory Living Arrangements (1 Stromness, 1 Isles).
- 0 Relationship Breakdown.
- 1 Insecurity of Tenure (1 Stromness).
- 3 Emergent households (2 Kirkwall, 1 Mainland).
- 5 No Priority (2 Kirkwall, 1 Stromness, 2 Mainland).

During 2020/21 the Council had 67 vacancies to fill, which were allocated as follows:

- 23 Homeless Households (16 Kirkwall, 4 Stromness, 3 Mainland).
- 3 Medical (2 Mainland, 1 Isles).
- 15 Overcrowding (10 Kirkwall, 2 Stromness, 1 Mainland, 2 Isles).
- 4 Under-occupancy (1 Kirkwall, 2 Mainland, 1 Isles).
- 3 Corporate Parent (3 Kirkwall).
- 3 Specific Need to be in the Community (1 Kirkwall, 1 Mainland, 1 Isles).
- 1 Unsatisfactory Living Arrangements (1 Mainland).
- 1 Relationship Breakdown (1 Isles).

- 2 Insecurity of Tenure (1 Mainland, 1 Isles).
- 12 No Priority (1 Stromness, 4 Mainland, 7 Isles).

During 2019/20 the Council had 72 vacancies to fill, which were allocated as follows:

- 22 Homeless Households (14 Kirkwall, 7 Stromness, 1 Mainland).
- 2 Medical (1 Kirkwall, 1 Mainland).
- 21 Overcrowding (14 Kirkwall, 3 Stromness, 2 Mainland and 2 Isles).
- 3 Under-occupancy (3 Kirkwall).
- 5 Specific Need to be in the Community (1 Kirkwall, 3 Stromness and 1 Isles).
- 2 Platinum (Urgent Housing Need) (1 Kirkwall, 1 Mainland).
- 9 No priority (1 Sheltered, 1 Kirkwall, 1 Mainland and 6 Isles).
- 2 Unsatisfactory Housing (1 Kirkwall, 1 Mainland)
- 3 Unsatisfactory Living Arrangements (2 Kirkwall, 1 Isles).
- 1 Relationship Breakdown (1 Stromness).
- 2 Emergent Households (1 Kirkwall, 1 Mainland).

For the purposes of the data above, the linked south isles are included in figures for “Mainland”. Figures shown for “Isles” refer to the ferry linked isles.

Island Communities Impact Assessment

[Lettings Policy, Housing Services]

Preliminary Considerations	Response
Please provide a brief description or summary of the policy, strategy or service under review for the purposes of this assessment.	Lettings Policy for Housing Services.
Step 1 – Develop a clear understanding of your objectives	Response
What are the objectives of the policy, strategy or service?	To ensure Council properties are let in accordance with allocations law and good practice.
Do you need to consult?	<p>No. A consultation was undertaken prior to formal approval of the policy in 2020.</p> <p>The requirement to undertake an Island Communities Impact Assessment came in after the Lettings Policy had been approved and therefore this ICIA is being undertaken retrospectively.</p>
How are islands identified for the purpose of the policy, strategy or service?	The policy covers the whole local authority area which includes all the inhabited islands.
What are the intended impacts/outcomes and how do these potentially differ in the islands?	<p>To ensure the Housing Service has in place an appropriate policy on lettings to appropriately deliver the changes introduced by the new legislation (the Housing (Scotland) Act 2014) which made changes to the reasonable preference groups.</p> <p>The legislative provision is the same in the islands. The targets set for individual groups through the lettings plan differ based on the actual allocations under taken over previous years.</p>
Is the policy, strategy or service new?	No. Its revised following a legislative change.

Step 2 – Gather your data and identify your stakeholders	Response
What data is available about the current situation in the islands?	Data from Council housing allocations broken down by area between mainland Orkney and the linked south isles (Kirkwall, Stromness, Mainland (including the linked south isles) and ferry linked isles recorded separately. This data is routinely reported to Education, Leisure and Housing Committee annually in June.
Do you need to consult?	No. A consultation was undertaken prior to formal approval of the lettings policy in 2020.
How does any existing data differ between islands?	The numbers are tiny so there will not be vacancies arising in each island with Council housing in any year. A small number of properties will become available for relet in an isles location and the precise location(s) will vary year to year. The basis of allocation according to statutory needs group for the ferry linked isles differs from mainland Orkney and the linked south isles. The proportion of allocations are substantially lower in relation to homelessness but don't differ significantly in relation to other statutory groups. Allocations on the basis of homelessness across mainland Orkney and the linked south isles, over the last 4 years totalled 49.3%. The equivalent figure for the ferry linked isles is 12.2%. In relation to other statutory needs, this is 24.5% and 20.2% respectively. Allocation on the basis of local needs (which is not a statutorily required group) recorded 10.8% for mainland Orkney and the linked south isles and 22.3% for the ferry linked isles accordingly.
Are there any existing design features or mitigations in place?	N/A. Lettings are undertaken in line with legislation. Our policy prioritises households in housing need under the legislation and priority passes are awarded accordingly. The household with the highest housing need, with a need for a property of the relevant size and location is awarded the property.
Step 3 – Consultation	Response

Who do you need to consult with?	N/A this was undertaken during 2019 and prior to formal approval of the policy in 2020.
How will you carry out your consultation and in what timescales?	N/A. The consultation was undertaken prior to formal approval of the policy in 2020.
What questions will you ask when considering how to address island realities?	N/A. As above.
What information has already been gathered through consultations and what concerns have been raised previously by island communities?	Information has been gathered through the consultation prior to the formal approval of the lettings policy in 2020. Information is also gathered through other processes. Orkney Matters meetings included housing issues in each community but this related more to a wish to have additional housing available rather than specifics around allocation per se. Information has been received from island development trusts / community councils around housing allocations and is addressed on a case by case basis.
Is your consultation robust and meaningful and sufficient to comply with the Section 7 duty?	N/A. The consultation was undertaken prior to formal approval of the policy in 2020.
Step 4 – Assessment	Response
Does your assessment identify any unique impacts on island communities?	No.
Does your assessment identify any potential barriers or wider impacts?	No.
How will you address these?	N/A.
<p>You must now determine whether in your opinion your policy, strategy or service is likely to have an effect on an island community, which is significantly different from its effect on other communities (including other island communities).</p> <p>If your answer is No to the above question, a full ICIA will NOT be required and you can process to Step 6.</p>	

If the answer is **Yes**, an ICIA must be prepared and **you should proceed to Step 5**.

To form your opinion, the following questions should be considered:

- Does the evidence show different circumstances or different expectations or needs, or different experiences or outcomes (such as different levels of satisfaction, or different rates of participation)?
- Are these different effects likely?
- Are these effects significantly different?
- Could the effect amount to a disadvantage for an island community compared to the Scottish mainland or between island groups?

Step 5 – Preparing your ICIA	Response
In Step 5, you should describe the likely significantly different effect of the policy, strategy or service:	
Assess the extent to which you consider that the policy, strategy or service can be developed or delivered in such a manner as to improve or mitigate, for island communities, the outcomes resulting from it.	
Consider alternative delivery mechanisms and whether further consultation is required.	
Describe how these alternative delivery mechanisms will improve or mitigate outcomes for island communities.	
Identify resources required to improve or mitigate outcomes for island communities.	
Stage 6 – Making adjustments to your work	Response
Should delivery mechanisms/mitigations vary in different communities?	The legislation is the same across all locations. Targets will be assigned through the lettings plan which will vary for isles locations based on actual lettings data in recent years.

Do you need to consult with island communities in respect of mechanisms or mitigations?	No.
Have island circumstances been factored into the evaluation process?	Yes, island circumstances are always factored into our strategies and policies relating to Housing as we deliver Housing Services across a broad range of island communities.
Have any island-specific indicators/targets been identified that require monitoring?	No. This will be done through the lettings plan.
How will outcomes be measured on the islands?	A report is presented annually to our Education, Leisure and Housing committee re how many properties have relet during the year, by area and by housing needs group. This is broken down by Kirkwall, Stromness, Mainland (including the linked south isles) and Ferry Linked Isles. This will continue to be done. A revised lettings plan will be presented to committee on an annual basis from March 2025 onwards.
How has the policy, strategy or service affected island communities?	There are Council houses across 11 separate islands including mainland Orkney. The legislative provision is the same in the islands. The targets set for individual groups through the lettings plan differ based on the actual allocations under taken over previous years.
How will lessons learned in this ICIA inform future policy making and service delivery?	N/A.
Step 7 – Publishing your ICIA	Response
Have you presented your ICIA in an Easy Read format?	Yes.
Does it need to be presented in Gaelic or any other language?	No.
Where will you publish your ICIA and will relevant stakeholders be able to easily access it?	Orkney Islands Council's Website with Committee Report and Minute on Lettings Plan. The ICIA is produced retrospectively for the Lettings Policy.

Who will signoff your final ICIA and why?	James Wylie, Corporate Director of Education, Leisure and Housing – line manager of Frances Troup.
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ICIA completed by:	Frances Troup
Position:	Head of Community Learning, Leisure and Housing
Signature:	
Date complete:	28 April 2023

ICIA approved by:	James Wylie
Position:	Corporate Director of Education, Leisure and Housing
Signature:	
Date complete:	18 May 2023