
Formal Analysis and Challenge: Potential Systemic Risks to Vulnerable Groups within the Draft Housing Allocations Policy

Purpose: To formally challenge specific provisions within the Draft Housing Allocations Policy that pose systemic risks to meeting statutory duties (Public Sector Equality Duty - PSED, Homelessness Reduction Act - HRA) and strategic objectives. This analysis focuses on the potential for the policy to inadvertently **exclude or generate adverse outcomes for refugees and sanctuary seekers**, undermining the city's commitment to social justice.

1. Eligibility and Qualification Criteria: Compliance and Disproportionality Risk

The proposed local connection rule and strict asset limits create significant, preventable barriers for recently recognized refugees, threatening statutory compliance and generating adverse social outcomes.

Risk/Issue	Strategic and Statutory Impact	Policy Recommendation/Challenge
Local Connection Rule and Non-Priority Refugees	Creates a systemic barrier for a highly vulnerable cohort— newly granted refugees classified as non-priority homeless —who cannot meet the three-year local connection due to recent displacement. This increases the risk of destitution, rough	Mandate an Explicit Exemption: Introduce a formal, clear exemption from the three-year continuous local connection rule for all individuals granted refugee status within the last five years, aligning with national eligibility guidance.

	<p>sleeping, and social harm, directly undermining the Council's obligations under the Homelessness Reduction Act (HRA).</p>	
Complex Homeless Presentations (Family Reunion)	<p>The policy is ill-equipped to manage the immediate, complex needs of family reunion cases where the principal applicant has less than three years of residency. This poses a significant risk of immediate family homelessness upon arrival.</p>	<p>Develop and resource bespoke assessment and triage protocols in collaboration with statutory partners to prioritize family reunion cases, ensuring immediate safeguarding and allocation regardless of the prior local connection duration.</p>
Disproportionality of Outcome (Equality Act Risk)	<p>The new criteria risk generating a disproportionality of outcome, effectively creating a two-tier housing justice system where access is weighted by historical residency. This poses a serious challenge to the Public Sector Equality Duty (PSED) regarding race and other protected characteristics.</p>	<p>Mandate Equality Impact Assessment (EIA) Review: Confirm the EIA explicitly models and mitigates this systemic risk. The policy must clearly establish a mandatory future review cycle for the EIA to continuously track and report on outcomes for refugee cohorts.</p>
Asset Limits (Property Owned Abroad)	<p>Disqualification based on property ownership anywhere risks being procedurally unjust, as the asset is often legally or physically inaccessible due to conflict. Arbitrary application of this rule results in the penalization</p>	<p>Implement Trauma-Informed Verification Protocols: Mandate and resource a formal process requiring trauma-informed verification of the genuine accessibility, liquidity, and relevance of any foreign</p>

	of victims of displacement.	assets before using them as a basis for disqualification.
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2. Homelessness Mitigation and Service Sustainability

The policy's focus on managing the register must not lead to the **externalisation of homelessness costs** and social harm onto the city's support services and streets.

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Potential Increase in Unseen Homelessness and Exploitation	<p>The policy's deterrent effect will predictably increase hidden homelessness, rough sleeping, and vulnerability to exploitation (e.g., modern slavery). While statistics on the waiting list may improve, the city can be severely affected by increasing street homelessness.</p>	<p>Mitigation Strategy Required: The Council must immediately detail how it is preparing to deal with this potential increase, including investment in long-term, sustainable alternative solutions (e.g., social letting agencies, comprehensive rent deposit schemes) to prevent homelessness outside of the allocation scheme.</p>
Access to Private Rented Sector (PRS) Barriers	<p>Vulnerable groups (e.g., refugees on benefits, lacking deposits or UK tenancy history) face insurmountable barriers to accessing the PRS. Excluding them from the social register without viable alternatives is not</p>	<p>Mandate a Hand-Held Approach: Formalise and resource a specific "hand-held" housing pathway to provide intensive support for those with systemic access barriers (benefits reliance, lack of deposits) to access</p>

	sustainable.	secure, affordable housing.
Abuse of Discretion and Staff Governance	The extensive reliance on subjective criteria for 'Unacceptable Behaviour' and disqualification creates a risk of misuse of discretion by staff , leading to inconsistent application and potential legal challenge.	Implement clear safeguarding and governance protocols to ensure fair, transparent, and consistent application of discretionary rules, supported by mandatory trauma-informed training for all allocations staff.

3. Policy Review, Oversight, and Stakeholder Engagement

The integrity of the policy process requires robust, proactive engagement with experts and a clear commitment to governance.

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Validity and Inclusivity of Consultation	Consultation relying heavily on accessible online surveys risks selection bias and excludes the voices of the most marginalized (those in deprived areas, with low digital literacy or language barriers), undermining the validity of the policy review .	Mandate Active Engagement: Commit to an active, resource-intensive engagement strategy which includes holding policy consultation meetings with Councilors in community locations and deprived areas , directly reaching vulnerable populations for feedback, rather than inviting them to Council premises.
Lack of Formalised	The success of complex allocation policies relies	Formalise Partnerships: The Council must commit

Partnership	heavily on expert input and delivery support from the VCS. Failure to mandate this risks a policy that is unenforceable or ineffective on the ground.	to making SPRING, City of Sanctuary, the Refugee Council, Red Cross, Shelter, and other community organisations active and formalized partners in both the ongoing review and implementation processes. This ensures policy is informed by expert, on-the-ground knowledge of need.
Communication Failure and Records	Failure to provide clear, accessible communication risks penalizing applicants for non-compliance with bidding rules or update requests.	Mandate Language and Support Protocols: Detail how the Council will use services like the Language Line and the involvement of VCS partners (e.g., COSS) to maintain robust, accessible records of notification and communication for all critical interactions with refugee applicants.
Policy Success Measurement	Measuring success solely on the reduction of the waiting list masks potential adverse social outcomes (e.g., increased hidden homelessness).	The policy must define how the council will measure its success using metrics rooted in social justice and inclusion, such as tenancy sustainment rates for vulnerable groups and verifiable reductions in hidden homelessness.