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### **HOUSING SCRUTINY PANEL**

#### Monday, 22nd April, 2024 at 7.00 pm in the Place Shaping Room, Civic Centre, Silver Street, Enfield, EN1 3XA

#### Membership:

co: Kate Anolue (Chair), Josh Abey (Vice Chair), Nicki Adeleke, Lee Chamberlain, Adrian Grumi, Nelly Gyosheva, Tom O'Halloran, and Eylem Yuruk

#### AGENDA – PART 1

#### 1. WELCOME & APOLOGIES

#### 2. DECLARATIONS OF INTEREST

Members of the Committee are asked to declare any disclosable pecuniary, other pecuniary or non-pecuniary interests relating to items on the agenda.

#### 3. MINUTES OF THE PREVIOUS MEETING (Pages 1 - 6)

To receive and agree the minutes of the previous meeting held on Monday 11 March 2024.

#### 4. HOUSING FRAUD/ILLEGAL SUBLETTING (Pages 7 - 10)

To receive a report on Housing Fraud/Illegal Subletting.

#### 5. **REVIEW OF SOCIAL HOUSING ALLOCATIONS POLICY** (Pages 11 - 22)

To receive a report on Social Housing Allocations Policy.

#### 6. WORK PROGRAMME 2023/24 (Pages 23 - 24)

To note the completion of the work Programme for 2023/24 and that the Housing Scrutiny Work Programme for 2024/25 will be discussed at the first meeting of the new municipal year.

#### 7. DATE OF NEXT MEETING

To note the dates of the future meetings will be confirmed following Annual Council on Wednesday 15 May 2024.

### MINUTES OF THE MEETING OF THE HOUSING SCRUTINY PANEL HELD ON MONDAY, 11TH MARCH, 2024

**MEMBERS:** Councillors Kate Anolue (Chair), Josh Abey (Vice Chair), Nicki Adeleke, Adrian Grumi, Nelly Gyosheva, Tom O'Halloran, Eylem Yuruk, George Savva MBE, and Jim Steven

#### Officers:

Joanne Drew (Strategic Director of Housing and Regeneration) and Neil Wightman (Director of Housing Services (Residents)

Also Attending: Councillor George Savva, Cabinet Member for Social Housing

#### 1. WELCOME & APOLOGIES

The Chair welcomed everyone to the meeting.

Apologies were received from Cllr Chamberlain who was substituted by Cllr Steven.

#### 2. DECLARATIONS OF INTEREST

No Declarations of Interest were received.

#### 3. MINUTES OF THE PREVIOUS MEETING

AGREED the minutes of the meeting held on 12 December 2023. Cllr Savva advised that he had given apologies for this meeting, but this had not been recorded in the minutes.

#### 4. SOCIAL HOUSING ALLOCATIONS

**RECEIVED** the report of Richard Sorenson (Head of the Housing Advisory Service)

Neil Wightman (Director of Housing Services (residents) presented this item with Joanne Drew (Strategic Director of Housing & Regeneration).

Neil Wightman provided a short update on social housing allocations this year. He drew the Panels attention to the key points in the report listed under the main considerations section (numbers 2-6) in the report.

Since the scheme was last amended four years ago the numbers on the housing register have doubled to 7,500. The number of properties allocated

yearly is approximately 450, this has been consistent over the last few years. Demand far outstrips supply of properties.

Good progress has been made on the decant of both Shropshire and Cheshire House and advised that these households have been given significant priority to be moved through the decant process.

Whilst the highest demand is for three bedroomed properties the majority of properties becoming available are one and two bedrooms. The report includes tables of allocations by bedroom size and by the means categories of these allocations. The emergency and exceptional take the highest number of the Lets, the majority of these being decants.

There is currently a government consultation on social housing allocations.

In answer to questions:

Neil Wightman agreed to provide members with figures of how many social housing allocations are outside of Enfield. Members were advised that this is a fairly low figure. Action Neil Wightman

A further update was provided on the decanting of the Shropshire and Cheshire House. There were around 170 tenanted homes in total, currently down to 34 and half of these have put expressions of interest on other properties. Officers are still working on this on a daily basis.

It was confirmed that the Shires is being decommissioned which means that the council will no longer be letting these buildings, looking at alternative options instead.

There was further discussion on the review of the allocations policy with regards to objectives, principles, and emerging ideas. This will be a light touch review as only 4 years since the last review. There are some clear decisions and priorities to be looked at such as overcrowding and who is best to get the scarce resources available. It was agreed that the review consultation could be presented at the next Housing Scrutiny meeting.

Overcrowding is a difficult issue; the report shows that only 16 large bedroom properties have been allocated this year. The Council's development programme will deliver some larger properties between now and August. As these are small numbers the review will look at what can be done to manage this, including what other authorities are doing on this issue. Looking at what support can be provided families in their homes living, supporting them to manage. It should be noted that we will never be able to meet demand.

Last year a 10-year fixed term tenure was introduced. It is hoped that after this period these larger properties are no longer required. Larger families with older children could look at putting them in split into 2 smaller properties, this is on the decants Where there is underoccupancy was Incentives are provided to encourage downsizing such as money per bedroom being given

up and top priority to choose properties that they would like to move to. There will be a marketing and promotional campaign later this year to encourage people to downsize.

Members felt that the points system is confusing and more could be done to help people to understand how this works. Officers agreed to take this issue back and look at how this could be explained better. Action Neil Wightman

The government consultation includes:

• a 10-year UK connection test, if connection cannot be proved then would be unable to go on any register in the country. Currently, Enfield use a local connection test where you must prove a connection in 3 out of 5 years (aggregate).

• Also proposes income test, we already use in Enfield though government could set figures at a UK threshold, Enfield will respond that we the threshold is local not national

• ASB is included looking at having exclusions from the register due to ASB and grant possession against social housing tenants where they are 3 proven examples of ASB

• There is an element on where fraudulent declaration, most local authorities do look at this already. The consultation is looking to strengthen measures against fraudulent application declarations.

Fraudulent applications are taken seriously in Enfield not only will people be removed from the register the local authority will name and shame.

Figures requested on number of reclaimed properties; officers advised that this will be included in the future update.

Should a household be evicted they would be unlikely to be accepted through the allocations service and as would be viewed as intentionally homeless. However, through the Homelessness Service advise and support would be provided.

Further clarification sought on UK wide connection test, at present this test does not exist. It is not yet known how this will work in terms of people who have not got recourse to funds. This is likely to be different from the local test. Not sure how many people would be affected where other authorities have looked at this it is between 6-8%. It will be the local authority's responsibility to determine the UK connection. It is suggested that there will be a range of exceptions such as those fleeing domestic abuse. The Homelessness legislation does not dovetail perfectly to the Allocations review.

It was agreed that a further update come to the next meeting on changes to be made to the allocations policy.

#### 5. ANTISOCIAL BEHAVIOUR (ASB)

**RECEIVED** the report of Neil Wightman (Director of Housing Services (residents)).

#### HOUSING SCRUTINY PANEL - 11.3.2024

Neil Wightman presented this item which provided a review against the new policy introduced last year.

Enfield has seen an increase in ASB offences in the last 12 months, the figure in the report is for ASB in general across the borough not just ASB in Social Housing. There has also been an increase across London but at a lower level.

The Housing team will be taking responsibility for ASB on Housing estates, previous management detailed under 5 in the report. This is currently in transition and training is ongoing.

The new policy is very clear that we will not tolerate ASB. There is a clear distinction between ASB the council can control and what is a crime and a police matter. There is a good relationship with the police.

The 12 service standards are detailed under point 11 and these are beginning to be tracked. The report contains a table (point12) details the types of ASB Enforcement Action and the Responsible Service.

The Council is looking to increase enforcement action and potential possession actions to send out a clear message that the Council will be tough on ASB. A target will be set this year.

Questions were then taken on the report and the service.

Paragraph 8 of the report relates to COVID, anecdotally the increase in working from home with people spending more time at home could have affected this.

Should you be evicted it is likely that they would be considered intentionally homeless, it is rare to be accepted after ASB resulted in an eviction. It is a very high test to meet court thresholds for evictions. This process is lengthy, and the Council must show that everything has been done to support the household prior to eviction. Often perpetrators are often also victims. Advise and support provided through the Homelessness Service. tough problems to solve, where help needed will work with other agencies to try to resolve situation.

Members felt that it is helpful to make very clear to households what ASB is the Councils responsibility and what is not and should be referred to the police.

It was confirmed that the drugs activity mainly related to cannabis use in flats, but there are hotspots of more serious drugs and will work closely with the police on this.

The report refers to the introduction of a noise app to help manage noise cases. Officers agreed to circulate more information on this. Action Neil Wightman.

Following Members request officers agreed to circulate details of main housing association providers to assist councillors when dealing with residents on ASB on these estates. Action: Neil Wightman

It was clarified that the figures under 17 relates to residents or family members living in Enfield. The figures listed here will include repeat offenders and priority on dealing with focus on those who persistently offend, and training is ongoing on this. The Government Consultation is helpful relating to this The Council is looking to serve more notices, which last for a year, even if these do not proceed to court these do have a high impact often with improvements seen and Acceptable Behaviour agreements being drawn up to regulate behaviour.

Members were advised it is unknown why ASB overall is higher than in London. In terms of Housing related ASB figures data has not been collected as to whether this has gone up or down.

After the withdrawal of funding for extra police officers on estates an increase on ASB on these estates has not been seen. It should be noted that service had been declining for a year prior to removing. Alternative partnership, meetings were put in place and additional resources made available through partnership working.

The improvement in satisfaction ratings it was felt was due to making sure that residents are kept informed even if no further progress is made at this stage. The council's publicity on zero tolerance is also helpful in showing that ASB is not acceptable.

With regards to domestic abuse there is already strong partnership working with SOLACE for example. The Council is working towards DAHA (Domestic Abuse Housing Alliance) accreditation. This is a national qualification. It would mean that the council would look at all procedures, policies, partnership work, how we protect victims. If this were to be achieved would allow a high level of service for the victims of domestic abuse. It takes approximately one year to achieve qualification; the council is committed to starting the process.

Members were surprised to see domestic abuse classified as ASB as opposed to serious crime. It is classified this way so that where it happens in a social home the Council can also look at civil action, such as excluding individual from the home.

Officers were thanked for their time.

#### 6. WORK PROGRAMME 2023/24

**NOTED** the work programme. A further item was added to the next meeting on an update on changes to the Allocations Policy.

#### 7. DATES OF FUTURE MEETINGS

#### HOUSING SCRUTINY PANEL - 11.3.2024

The date of the future meeting was noted as follows:

Monday 22 April 2024



#### London Borough of Enfield

Report Title	Housing Fraud
Report to	Housing Scrutiny Panel
Date of Meeting	22 April 2024
Cabinet Member	Cllr Savva
Executive Director	Joanne Drew
/ Director	
Report Author	Neil Wightman Director of Housing Services (Residents)
Ward(s) affected	N/A
Classification	Public
Reason for	N/A
exemption	

#### 1. Introduction

Council housing fraud affects the availability and quality of social housing for those who need it most. Housing fraud occurs when someone obtains or occupies a council property that they are not entitled to or sublets it to someone else without permission. This deprives other eligible applicants of the opportunity to access affordable and secure housing and costs the council money and resources that could be used for other purposes.

#### 2. Types of Housing Fraud

#### Housing Application fraud

This is when someone provides false or misleading information on their housing application (housing register of homelessness application), such as their income, household size, or personal circumstances, to gain priority or eligibility for a council property.

#### • Occupancy and Subletting Fraud

This is when someone who has been allocated a council property does not live there as their main or only home and leaves it empty or uses it for another purpose, such as a holiday home or a business. They may sublet

and rent it out to someone else, either partially or wholly, without the council's consent.

#### • Succession Fraud

This is when someone who is not eligible to inherit or succeed a council tenancy after the death or departure of the original tenant tries to claim or take over the property.

#### • Right to Buy Fraud

This is when someone who is not eligible to buy their council property under the right to buy scheme tries to purchase it or uses false or forged documents to do so.

#### 3. Anti-Fraud Measures

- 3.1 The council takes council housing fraud very seriously and has several measures in place to prevent, detect, and prosecute it, such as:
  - Verifying the identity, income, and circumstances of all housing applicants and tenants, and conducting regular checks and audits.
  - Encouraging residents and staff to report any suspicions or evidence of council housing fraud and providing a confidential hotline and online form for this purpose.
  - Investigating all reports and allegations of council housing fraud and using a range of powers and tools to gather evidence, such as data matching, surveillance, and interviews.
  - Taking swift and firm action against those who are found to be committing council housing fraud, such as terminating their tenancy, recovering any money or property obtained fraudulently, and prosecuting them in court.
  - Publicising the outcomes and consequences of council housing fraud cases and raising awareness and education among the public and staff about the issue and how to prevent it.

#### 4. Reporting fraud, the role of Fraud team, performance, and outcomes

- 4.1 The Counter Fraud Team protects the Council against fraud by putting in place counter fraud measures, raising awareness of fraud and undertaking professional investigations of frauds that are suspected to have occurred. This includes.
  - **Preventative work** promoting fraud awareness and fraud prevention across the Council, which includes taking part in the annual International Fraud Awareness Week and similar activities.
  - **Proactive work** including targeted exercises designed to identify potential frauds. For example, the Council has agreements with Housing & Regeneration to risk-assess all right to buy and succession

applications and no recourse to public fund applications in order to prevent and/or detect fraud.

- **Reactive work** which accounts for a large proportion of counter fraud work and involves responding to referrals submitted to the team. Referrals can come from internal employees, agency staff, contractors (sometimes through the whistleblowing route), and from external means such as residents, the general public, organisations such as other local authorities and the Police. Allegations may relate to corporate work, benefits, and tenancy.
- 4.2 Suspected fraud can be reported internally at Audit and Risk Management -Counter (sharepoint.com) which also has additional useful information. Alternatively concerns can be reported by speaking to one of the team at 020 8379 3166 or emailing at fraud.team@enfield.gov.uk.

#### 4.3 Housing Fraud Data

The table below table includes data for 2022/23 and 2023/24 on cases where there is an established outcome and does not include the numerous cases investigated where there is either no saving, outcome or where the case is ongoing.

Category	2022/23 (case no)	Saving £	2023/24 (case no)	Saving £
Non- occupation and sublet recoveries)	11* (inc 4** TA properties)	304,000	9* (including 1** TA)	338,500
Succession denied (recovered)	6 (5)	252,000	6 (5)	252,000
Homelessness and temporary accommodation	1*** (removed from register)	3,240	4*** (removed from register)	12,960
RTB	9	900,299	1	127,900
Housing – Buy Back Scheme	N/A	N/A	1	212,900

\*Tenancy recovery figure - £42,000

\*\*TA recovery figures - £2,500

\*\*\*Removal from register - £3,240

#### 5. Case studies

#### 5.1 Non-occupation/sublet case

The tenant was found to be living in the Isle of Wight. Powers used under the Prevention of Social Housing Fraud Act (POSHFA) to obtain the tenant's bank statements which showed transactions overwhelmingly in the IOW. The tenant was interviewed under caution and initially denied non-occupation and subletting

and attempted to fight the case but due to the evidence against them surrendered the tenancy. This case is currently being pursued for prosecution.

#### 5.2 Right to buy

The tenant was identified to be living in the USA. The tenancy address came within part of a regeneration program and if the RTB had succeeded the tenant would have benefitted from the Council buying back the property. Airline data was obtained to show the tenant had been out of the country for long periods and were able to establish the tenant had married and bought a property in the USA where he is believed to live with his wife and children.

The tenant was interviewed under caution, following this, the tenant withdrew the RTB application and surrendered the tenancy. There were savings to the Council by not having to buy back the property.

#### 5.3 Succession

A grandson applied to succeed the tenancy of his grandmother, claiming he had lived with her for 6 years prior to her death. An investigation by the Counter Fraud Team found the grandson had been living in temporary accommodation elsewhere and claiming benefits at the TA address. The application was subsequently withdrawn.

#### **Report Author:**

Neil Wightman Director Housing Services (Residents)

#### Appendices

None

**Background Papers** 

None





#### London Borough of Enfield

Report Title	Review of the Housing Allocations Scheme			
Report to	Housing Scrutiny Panel			
Date of Meeting	22 April 2024			
Cabinet Member	Cllr Savva			
<b>Executive Director</b>	Joanne Drew			
/ Director				
Report Author	Neil Wightman Director of Housing Services (Residents)			
Ward(s) affected	N/A			
Classification	Public			
Reason for	N/A			
exemption				

#### 1. Purpose of Report

1.1 To provide an update on the review of the social housing allocations scheme.

#### 2. Main Considerations for the Panel

- 2.1 The operating environment has changed significantly since the introduction of the current scheme. The Council is planning to review the allocations scheme during 2024/25 to ensure that we maximise the benefits for Enfield residents.
- 2.2 There are currently 7500 households on the housing needs register. This has grown from 3500 in 2020 when the current allocations scheme was introduced.
- 2.3 In any given year around 450 properties will become available to let, meaning that households can expect to wait for several years before having sufficient priority to be allocated a property.
- 2.4 The Housing Allocations Scheme will be reviewed in the light of the increased pressure on both residents and the Council since the introduction of the scheme and will determine the Council's priorities as to which groups of residents will be housed.

#### 3. The purpose of the allocations scheme

- 3.1 The scheme explains the criteria and procedures for applying for social housing in a local authority. It covers:
  - How to register an application and what information is required, such as personal details, household composition, current and previous addresses, and supporting documents.
  - Who is eligible to apply for social housing, based on their income, residency, and housing circumstances.
  - How the local authority allocates properties to applicants, according to their points, preferences, and availability of suitable properties.
  - The assessment of housing needs and preferences of applicants, taking into account factors such as overcrowding, homelessness, medical conditions, and special needs.
  - How applicants can bid on properties that match their needs and preferences, using an online system that advertises vacancies and allows applicants to express interest in up to three properties per week.
  - The consequences of refusing or accepting an offer, how applicants can review or cancel their application, and what are the reasons for doing so, such as change of circumstances, dissatisfaction with the service, or finding alternative accommodation.
  - How the local authority monitors and reviews the social housing scheme, and what are the rights and responsibilities of applicants and tenants.

#### **Relevance to Council Plans and Strategies**

#### 4. Review of the housing allocations scheme

#### 4.1 Good homes in well-connected neighbourhoods

The policy is intended to ensure that the Council and residents can make the best use of existing housing, across a wide range of tenures and links to our wider Housing and Good Growth Strategy.

#### 4.2 Sustain strong and healthy communities

The allocations scheme gives far greater priority to households who have disabilities or health needs. This is of particular benefit to families with disabled children.

#### 4.3 Build our local economy to create a thriving place

The policy is an intrinsic part of our Homelessness and Rough Sleeping Prevention Strategy. We aim to improve access to safe and affordable housing for all residents through a range of initiatives and strengthen residents' ability to sustain the housing through support and training.

#### Report Author: Neil Wightman Director Housing Services (Residents)

#### Appendices

None

### Background Papers

Housing Allocations Scheme

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# Allocation Scheme Review

# Housing Scrutiny March 2024



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# Introduction

Light touchProposed to have a light touch review as the Scheme was last updatedreviewin 2023 and the government is consulting on national changes to<br/>allocations

**Open list** It is proposed to keep the open Housing Register where anyone can join it (if they meet basic criteria).

### Government Consultation

- Ten year UK Connection Test
- Income Test we already have but the Government is proposing a single threshold
- Exclusions for anti social behaviour
- New 'three strikes' ground for eviction
- Fraudulent declaration test



### **Points v Bands**

Points versusThe two main options for managing allocations is either a points schemesband schemesor Bands.

We currently run a points scheme which awards points for relative needs, where cumulative issues or strategic priorities can be managed. Band schemes generally separate applicants into four or five bands, again dependent on need and priorities.

Both types or schemes are complex and can be difficult to explain to applicants. Points often can be more flexible than Bands as they can better reflect cumulative need, bands can be simpler to understand but can also be difficult to move between the bands, creating dissatisfaction. Points can be more complicated as there are different levels of points depending on household circumstances

- There is no ideal particularly with a limited housing supply
- Moving to Bands would be a significant change which would incur costs
- It should always be remembered that whichever scheme is used, time waiting not an issue as we prioritise need at the point of application or change of circumstances



# **Scheme administration**

### Offers and process

We use **Choice Based Lettings (CBL)** to allocate. Recommendation is to keep CBL, not least due to the cost of changing systems

The new scheme will reflect the larger number of **direct offers** due to strategic priorities and regeneration



# **Qualification for housing**

Local connection

We accept applicants (with exceptions like Domestic Abuse victims) who have 3 out of 5 residency.

Moving to a longer local connection will ensure that the limited housing resource is allocated to those with a strong connection to the borough.

Trend amongst other boroughs is to move to a longer period

# Income and savings

The Government is consulting on Income and Savings thresholds

Affordability assessment, based on a 25% share of a shared ownership resulting in a household gross income of £46,282

# Some issues to consider at consultation

- Should we move to a 10 year qualification?
- Should this include working as well as living in the borough?
- Should this be continuous or will breaks count?

Proposed to keep as is pending the Governments consultation



# **Priorities**

Prioritise allocations to overcrowded families with dependent children

Prioritise overcrowded families with children by excluding nondependent children/relatives over 21 years old.

This makes best use of our housing stock and supports the poor health and education determinates associated with overcrowding. It promotes choice and options for adult non-dependents.

It doesn't keep families together or promote multi-generational living, may impact on support for older residents and may have disproportionate impact on some groups with protected characteristics.

# Some issues to consider at consultation

- Include over 21 year olds who are:
- vulnerable residents
- carers
- over 60 year olds or
- residents full time education
- Mitigate impacts
- offer housing advice
- provide higher priority on the intermediate housing list
- review the New Generation scheme to support younger families within families.



# **Priorities**

Enduring need and cumulative need

We want a scheme that focuses more on supporting a lifetime and cumulative need.

Consider cumulative need - health and overcrowded

# Issues to consider at consultation

- Should larger properties be prioritised for overcrowded families where there is also enduring heath conditions
- Review and consult on cumulative need and relative priorities

Households in temporary accommodation Households in temporary accommodation pre 2012 must be offered a secure tenancy It is recommended that we should provide greater priority to these households



### **Priorities**

### **Homeless** applicants

Priority is given to homeless applicants willing to move into the stay on the housing list if they move outside Enfield

### Issues to consider at consultation

It is recommended that There should be a stronger private rented sector, and they can prevention focus to help reduce TA costs

> Time limit the local connection for moves outside Enfield

Where we discharge our homelessness duty, end local connection (within rules for PRSO)



#### HOUSING SCRUTINY PANEL 2023/24

#### CHAIR: Cllr Kate Anolue

Date of meeting	Торіс	Lead officer	Lead Members	Executive Director/ Director	Scope
15 June 2023	Work Planning				
26 Sept 2023	Temporary Accommodation (in depth) –	Richard Sorensen/Duane Dwyer	Cllr Savva	Joanne Drew	<ul> <li>To Include <ul> <li>the causes that lead to these circumstances;</li> <li>the periods of time residents wait to be placed in TA and remain in TA;</li> <li>associated health issues (including mental health); how these issues can be resolved;</li> <li>the process, timeframes, and turnaround for decisions regarding TA;</li> <li>how the council supports those with no access to public funds;</li> <li>homelessness; rough sleeping; sofa surfing; residents outgrowing properties; hotel and Airbnb accommodation; and section 8 &amp; 21 (eviction) notices.</li> </ul> </li> </ul>
12 Dec 2023	Housing Supply (in depth)	Nnenna Urum Eke and Amena Matin	Cllr Caliskan	Joanne Drew	<ul> <li>To include:</li> <li>what the council is doing to increase supply;</li> <li>how the council is working with partners – potential to</li> </ul>

					<ul> <li>invite and speak to housing associations, landlords and residents;</li> <li>and affordable housing supply for local people.</li> </ul>
21 <sup>st</sup> Feb 2024 Moved to 11th	Housing allocation & bidding process	Richard Sorensen	Cllr Savva	Joanne Drew	<ul> <li>To include:</li> <li>the faults/ challenges of the processes; points/eligibility; and over/under populated/occupied homes.</li> </ul>
March 2024	Anti-social behaviour – to include litter, alcohol, vandalism, noise, and drug use – particularly in/on estates.	Harjinder Lota/ Neil Wightman	Cllr Savva/Cllr Needs/ Rick Jewel	Joanne Drew	To include: • litter, alcohol, vandalism, noise, and drug use – particularly in/on estates.
22 April 2024 Confirmed Additional date	Housing fraud/ Illegal subletting etc.	Neil Wightman	Cllr Savva	Joanne Drew	<ul> <li>To include:</li> <li>Social Housing Regulation Act 2023 - implementation and impact.</li> </ul>
	Review of the Housing Allocations Scheme	Neil Wightman	Cllr Savva	Joanne Drew	To include: • Update on Allocation Policy Review