



Housing Action Southwark & Lambeth

Sunday 14th March 2021

By email only to: housingconsultation@lewisham.gov.uk

Housing Action Southwark and Lambeth is a group of families and individuals struggling with homelessness, overcrowded housing, and other poor housing conditions. We support each other with our housing cases and fight for the high quality, safe, secure council homes we all need.

Our group is run collectively by our members contributing their time and skills to the group. We have over 600 members registered on our group phone to receive whatsapp messages and we meet 100 members each month on our regular zoom meetings. We have one paid worker who is paid for 2 days a week and from 2021 we were able to employ another member to work for 1 day a week. We have almost 8 years of experience organising support and practical help for each other. Overcrowding and problems with temporary accommodation are the most common problems faced by our members and we have developed a strong knowledge of these issues. At the group meetings we provide moral support and we organise practical support including: sharing rights information, help with interpretation, writing emails, finding lawyers, accompanying to appointments at the housing office and with lawyers, and organising workshops.

Reflecting some of those worst affected by the housing crisis, our group is made up of migrant women of colour and their families – the group is made up of people from lots of different nationalities and it is really diverse. Many of our members do not speak English as their first language, so we rely on volunteer interpreters. Due to language barriers, our members face additional barriers to accessing decent housing and housing assistance. Many of our members are also dealing with medical problems and disabilities, giving unpaid care work, dealing with immigration issues and other poverty problems, and some have also been victims of domestic abuse. Very often as well as housing problems, our members are dealing with multiple vulnerabilities and inequalities.

Overcrowding

We strongly oppose the council's plans to reduce the banding of 5,011 households in overcrowded housing which includes the creation of a new band 4 (low priority) at the bottom of the housing list that 4,612 of these families would be demoted to. The council's own statistics show that 44% of families who are currently in band 3 for being 'overcrowded by 1 bed' are actually statutory overcrowded¹. Statutory overcrowding is an out of date legal definition of severe overcrowding that was last updated in 1935. The threshold is so difficult to reach that the [last Labour government said that it needed to be improved](#). It is inexcusable for these proposals to suggest placing families with such a high level of overcrowding at the bottom of the housing waiting list. This is even more insulting considering the difficulties families living in overcrowded housing have endured over the last year of lockdowns.

The framing used by the council when describing these proposals is also misleading and dishonest as it claims to 'help target those in most need' and 'be more successful in allocating properties to households who are in the most overcrowded situations' without openly explaining that this comes at the expense of other families living in severely overcrowded housing. (We discuss the framing of the survey in more detail in the 'concerns about the format and conduct of the consultation' below)

¹ This statistic was provided by Lewisham Council's legal team to one of our members in response to a pre-action letter.

There is also an obvious and more effective solution to supporting families 'overcrowded by 3 beds' which is to place these families in band 1 (emergency band) which would allow them the urgent move they need to permanent housing due to their extreme level of overcrowding. The current overcrowding bands for band 2 (high) and band 3 (medium) could then remain the same avoiding the situation of demoting overcrowded families. This policy would genuinely meet the councils stated aims above whilst ensuring that others in high housing need still have a fair priority on the housing waiting list.

The council's proposals on overcrowding have two very serious consequences:

(1) It downplays the seriousness of overcrowding by putting households in severely overcrowded housing at the bottom on the housing waiting list and describing this as a 'low priority'. It is likely that people would assume that band 4 would be for those with no housing need. By having a new band 4 to demote overcrowded families, the council is distorting what should be a needs based housing waiting list by having those with a high housing need at the very bottom. Retaining the current overcrowding banding system is very important to reflect the housing needs of Lewisham residents as accurately as possible. The council should also consider increasing the priority for families who are overcrowded in bands 2 and 3 who are statutory overcrowded.

We understand first-hand that there is a desperate shortage of council homes, particularly larger family sized 3, 4, 5 bed council homes – the council explains that it is making these changes due to these pressures. However, the council should still keep a waiting list that is fair and based on housing need. Re-arranging and distorting the housing waiting list does nothing to address the root causes of the housing crisis and actually worsens the housing crisis by hiding and down-playing it the scale and seriousness of it.

Overcrowded housing was a public health crisis before Covid 19, but the Covid 19 epidemic has also exposed and exacerbated physical and mental health issues for those in overcrowded housing. There have been numerous reports showing that overcrowded housing is related to the spread of Covid 19 and residents are more vulnerable to ill-health and death. A [Public Health England report](#) states:

"The risks associated with COVID-19 transmission, morbidity and mortality can be exacerbated by the housing challenges faced by some members of BAME groups."

It is important that Lewisham council recognises and treats overcrowded housing as the serious problem that it is.

(2) People of colour and migrant families are disproportionately affected by overcrowded housing. Lewisham council will further marginalise these households if they are demoted to band 3 and band 4 and denied the chance to successfully bid for permanent social housing.

Statistics show that while only [2% of White British households are overcrowded, 30% of Bangladeshi households and 15% of Black African households are.](#)

[Research by IRMO](#) also highlights how Latin Americans are more likely to live in overcrowded housing: *"The No Longer Invisible report found that 27% of Latin Americans lived in multi-person households, sharing on average with two other families (McIlwaine et al 2011). Similarly our survey found that 23.8% live in housing in which they reported that more than 6 people lived and 28.9% reported that they had no communal space."*

The council's own Equalities Impact Assessment shows that families on the housing register who are Lewisham Homes tenants shows that Black African households are disproportionately represented in the overcrowded categories. The council's data on ethnicity for everyone on the housing register is by the council's own admission 'limited' with 70% leaving this option blank. This makes understanding the impact of the overcrowding changes on different ethnicities impossible to understand. Despite having a sizable

Latin American population, this ethnicity is not recorded, although other London boroughs such as Islington, Southwark, Lambeth and Hackney officially recognising Latin Americans as an ethnic group.

Families of colour and migrant families face structural barriers when trying to access decent housing which forces them into overcrowded and poor quality housing as this is all they can access:

- High private rents
- Benefit cuts
- No Recourse to Public Funds
- Low wages
- Racist discrimination by private landlords
- Private landlords refusing to rent to families claiming benefits or families with children
- Government's Right to Rent policy

Our members regularly explain that due to high rents and discrimination in the private rented sector, they are unable to find any other accommodation and are forced to endure overcrowded living conditions. The discrimination they face in the private rented sector is due to claiming benefits, not speaking English as a first language and having children. When they do find a private landlord who is willing to offer them a tenancy, they must accept it as they have no other option, even if the property is not large enough for their family. Often, these landlords are non-reputable people, as well as being overcrowded, our members have reported harassment, bullying, illegal evictions, and disrepair.

Case studies

(1) Maria is a Latin American single mother of two daughters living in a small 1 bedroom privately rented flat. She has already had to wait 5 years before she could join the housing register. She is still waiting for her housing register account and under the current scheme she will qualify for band 3, however, under the proposed changes, she would be placed into band 4.

"I live in a small 1 bedroom flat with my two daughters aged 13 and 19. We have lived in this tiny flat in Lewisham for 5 years.

The flat has a lot of damp and mould and I have constantly complained about this to the landlord but he has never made any repairs to the flat. He just ignores my complaints.

My two daughters sleep in the same bedroom and I sleep in the living room next to the kitchen because it is open plan.

In the lockdown my daughters are at home 24/7, they are both studying at home and it is causing a lot of stress and conflict between them. They are studying online classes and they argue because they need more space.

The property is old, it's very cold, and we have to put the heating on full, so the bills have gone up and electricity and water. All the bills have increased.

I am a single parent and we don't have a lot of money so we don't have the option to move anywhere else. My 13 year old is studying and so we can't move to another area as this would disrupt her studies.

I am struggling to make ends meet, and I am lucky because I have not lost my job. It's impossible to get more work at the moment because no one is hiring. We are struggling financially.

It's very bad what the council are proposing, I feel like the council is being really insensitive because now everyone is struggling financially, emotionally, mentally, they are not pulling their weight on the situation – I feel like how they are acting is inhumane, they should be helping us in this situation."

(2) Claudia and her husband and 3 children live in a tiny 1 bedroom private rented flat. They are Latin American. They have lived in the flat for 7 years where they are statutory overcrowded. They are currently in band 2 on the housing register and she has been bidding for 2 years. Under the proposed changes, the family would be put into band 3.

"Me, my husband and our 3 children, my son aged 13, my daughter aged 7, and my son aged 20 months live together in a tiny 1 bedroom flat.

It is very very difficult, and even more pressure with the pandemic. We don't have space and it has been hard to survive in these conditions. Really, it hurts me a lot seeing the impact on my children.

The two children try to study in the living room, their time tables clash, both me and my husband study at Lewisham college studying English and our courses are online too. We are all trying to do our studies in the flat. It has been very difficult because of the noise. We don't have space for anything.

My children need to concentrate when they are doing the home schooling, so sometimes I have to go into the kitchen with the baby because the noise is distracting for them. My husband sometimes has to go to the corridor or the bathroom for his zoom classes so that he does not disturb the children.

We have lived here for 7 years. The 2 children sleep in the living room and me and my husband and the baby sleep in the bedroom. We have bunk beds in the living room and there is very little space. We used to eat on the floor together and then we bought a folding table that we unfold to eat on and then put it in the corner.

We had to wait 5 years before we could join the housing register. And we applied 2 years ago and we have been waiting for 2 years on the waiting list. We haven't had a word or an answer from the council about our position. We would like to have a response telling us if we have to wait a year or how long we should expect. It would give us some hope. For me [the new policies] it is like saying you will never have a house."

(3) Adriana and her family live in a 1 bedroom flat. They are a Latin American family. Adriana is disabled and her youngest son suffers from asthma which is made worse by the poor quality housing. The family are statutory overcrowded in their flat. When their eldest son turned 21 recently, they were able to move up into band 2 for missing 2 bedrooms, however, under the proposed changes, the family would be moved back down into band 3.

"Dear Council,

We have lived in an overcrowded home for about 9 years now and during these 9 years we have been actively bidding on the Lewisham Homesearch website, unfortunately with no success. These circumstances are very frustrating and unhealthy. This has provoked a further negative effect to my younger son who is asthmatic as the current room where he sleeps is very mouldy and humid, despite our best efforts to keep this clean and mould free it always reappears.

The tight claustrophobic living conditions have also not helped with my current depression and anxiety state further to my fibromyalgia state and chronic migraine. You can imagine how all the above has deteriorated even further due to the pandemic's confinement. Where it is possible when members of that household work from home it is difficult because there must be complete silence and then you have my younger son attending school zoom classes where he actively must participate, hence causing concentration conflicts.

It has been exceedingly difficult living like this, and it just continues to be even more challenging especially now with the current state. We plead to be considered when it comes to the bidding and appreciate any type of support.

Every family should be able to have their own private space where it is possible to rest and feel secure. It is very unfair that new policies introduced may potentially waste the many years we have spent bidding and climbing up the priority system.

We just wish to have a suitable humble home for ordinary working-class family.

Kind regards,

Adriana"

Homeless households

We think it is positive that the council are looking for ways to better support homeless households who have an additional need with a new band 2 category 'homeless with additional need priority'. We believe a needs based system for allocating social housing is vital and that it is important for this system to recognise the multiple needs that some households have. We discuss this more in our section on domestic violence below as well and we would hope that this would be classed as an 'additional need'. As well as homeless households who have an additional need, we would hope that families in overcrowded housing in band 3 and who have an additional need would also be considered for band 2 to reflect their multiple housing needs.

We do not feel at all clear about the council's proposed criteria for determining this 'additional need' and we believe that this needs some more thought. There should be a simple and clear policy outlining the criteria for additional need so that people can understand whether they should qualify for this. When assessing whether someone has an additional need, the council should recognise and engage with evidence presented by the household themselves and professionals who know the household well, for example, schools, GP, other medical staff and support workers.

We are extremely concerned that the council are proposing to incorporate the Private Rented Sector Discharge Policy into the housing allocations policy as criteria for 'homeless with an additional need priority'. No priority should be based on forcing other homeless families back into private rental housing using Private Rented Sector Discharge Policy. The Private Rented Sector Discharge Policy should not be used at all against homeless households and we urge Lewisham council to urgently drop this policy completely. We do not believe that such a policy can be justified at any time, but particularly now as economic uncertainty is even greater, it does not make practical sense to force people into the private rented sector when they could lose their job and would be unable to afford the rent, making them homeless yet again.

We have seen first-hand in HASL the serious distress, confusion and the erosion of homeless rights that this policy causes to Lewisham families. Eviction from private rented housing is a main cause of homelessness and therefore this policy only fuels a cycle of homelessness. In one HASL member's case, she had been targeted for a private rented sector offer even though she is a victim of domestic violence. We would argue that she should qualify as having an 'additional need' under Lewisham's new proposal, but Lewisham council deemed a private sector offer appropriate for her.

Lewisham's Equality Impact Assessment shows that over half of homeless applications have been made by Black Asian and Minority Ethnic households. The EIA shows that 57.8% of homeless applicants are female. Lewisham's Private Rented Sector Discharge Policy is therefore highly likely to disproportionately affect women of colour and their families. From our own [Freedom of Information request](#), we found that 75% of homeless households forced to take private rented offers were single parent families.

It seems dishonest and suspicious of the council to give additional support to some homeless households whilst relegating others back into the private rented sector. We are concerned that the 'homeless with

additional need priority' category could lead the council to aggressively pursue the Private Rented Sector Discharge Policy to homeless households in band 3.

We welcome the recognition that households in housing need who have an additional need should have higher priority on the housing waiting list. The criteria need to be thought about carefully and sensitively. However, in order to give homeless households the protection and support they need, we urge the council to end the Private Rented Sector Discharge Policy completely, allowing them to remain in temporary accommodation until they are able to successfully bid for the permanent housing they need.

Case studies

(4) One homeless family living in temporary accommodation, a single mother and her two children, faced a private sector discharge. She describes the stressful and traumatic experience when Lewisham council wrongly insisted that she had refused it and threatened to end her homeless duty and temporary accommodation.

Me and my two daughters have been living in temporary accommodation for over 1 year. Then suddenly, I had a call from one of the people responsible for finding accommodation – they told me they had found private accommodation for me outside of our home borough of Lewisham. With the help of the lawyer, the council withdraw their decision.

I was so scared by the whole experience, I was worried they would stop me bidding. I don't know when they are coming back for me. It really really drained me because at a point you will be thinking, what is all this. It was a lockdown – at the same time you are being told you have to move. Both my daughters have asthma. My younger daughter has allergies and uses the EpiPen. I have been really cautious to avoid the hospital so that we do not catch Covid, during the first lockdown I took self-isolation with no pay to make sure that we were safe and that we could avoid the hospital. I don't want to have to move home and to bring someone I don't know to help me move.

I tried to hide the situation from my children but they were very sensitive about it, they were able to pick it up, "mummy something is not right, mummy are we going to be on the street?" I had to reassure them that things will be fine. I was giving them courage in words. They knew that mummy is going through a lot right now.

I don't think it's a good policy, because at the end of the day, they will see problems. At the last meeting, with other family members with their stories, they had gone to the private offer, and they had had to return to the council because they could not meet the rent. If you look at the bigger picture, it is not a good thing. We don't need a huge rent that is stressful, it is difficult for you to make ends meet.

My message, my advice is the council should try to treat people fairly as this makes people feel happy and helps with their well being and mental health. I am a strong woman, and my background, I don't allow things to put me down. Those 2-3 months, I was having this issue, it makes me traumatised and stressed which affects your mental health.

(5) Another homeless family living in temporary accommodation, a Black African single mother and her children, describes her case including the threat of a private sector offer:

"I am a single mother who fled from domestic abuse. Myself and my children have lived in a refuge, then to private accommodation after which the Landlord evicted us and as a result, we became homeless.

We were initially placed into emergency accommodation. It was a shared residence, living in one room with an en-suite. The toilet was always blocked, there was mold all over the walls, frequent leakage and the carpet smelt like urine. I raised my concerns to the council and they were able to sort some of the problems.

After spending a few months there, we were then told that temporary accommodation has been found in Harlow. This was not ideal as it would affect my children's school and my work. I raised my concern with my local MP and the council, so the offer was removed. I was then given another offer the next day and I was not allowed to know the location, and told if I didn't accept then the council's duty of care would be withdrawn. When I got to the location, it was more than two hours away and found that it was located in the same borough as my ex-partner who I was fleeing from. I immediately informed the council as they were aware of this. I was then moved two more times by the letting agent within the day dragging my belongings everywhere which was very stressful, going to work and taking my children to school. I again reported it to my local MP and to the council. They then withdrew the offer and found somewhere else. The final place we were given was ideal concerning school and work and we are happy living here while we bid for social housing.

Recently I received a phone call by someone in the housing department saying that they have found private accommodation for us. I told her that I would not be able to afford private accommodation as I was previously in zero hour contract part-time and due to the pandemic, I had lost my job. I told her I am happy to stay here until social housing is available. Renting in the private sector for someone like me who clearly cannot afford it would leave me destitute, plus there is no security for me and my children as we could get evicted at any point. She laughed at me and said I would be waiting forever and I will never get social housing. Yet again the offer was withdrawn because I am currently unemployed and she expressed that she would find private accommodation for my family.

To be honest I don't know any of my family or friends who aren't in social housing and I feel like my situation is going unnoticed. I am very worried for my mental health as I have history of depression and anxiety which the council is aware of but didn't take into account, also the well-being of my children (as my eldest is also sitting her GCSE's next year).

I feel like the policy of housing or re-housing needs to be seriously reviewed. Moving families out of London or hours from their work and schools, or moving them multiple times to different temporary accommodations. Along with forcing families especially single parents to accept private accommodation when it is clearly not suitable for them. I believe that making more social housing available for vulnerable families and providing them with enough support and compassion from members of staff at the council would have a positive impact."

Domestic violence

It is disappointing that when drafting the new housing allocations scheme Lewisham council did not take this opportunity to include more support for victims of domestic violence especially in the light of new statutory guidance issued by the government in November 2018 entitled *"Improving Access to Social Housing for Victims of Domestic Abuse in Refuges or Other Types of Temporary Accommodation: Statutory guidance on social housing allocations for local authorities in England"* (MHCLG, November 2018).

The guidance recommends that local connection criteria and residence requirements should not be applied to those living in a refuge or "other form of safe temporary accommodation" in the borough. We would encourage Lewisham council to make it clear in their new housing allocations scheme that the local connection criteria should not be applied to any victim of domestic violence.

The guidance also reminds councils that victims of domestic abuse and their families are likely to have "medical and welfare needs, including physical and mental health issues, which may be complex and long-lasting" and "strongly encourages all local authorities to apply the medical and welfare reasonable preference category to victims and their families who have escaped abuse and are being accommodated in a refuge or other temporary accommodation." Lewisham council could do this by including victims of domestic violence in the new proposed 'homeless with additional need priority' category for band 2. Another option

could be to give victims of domestic violence an extra 2 years (or another period of time) within their band to increase their position on the waiting list as the waiting time within the band is used to order applicants.

Local connection criteria

Lewisham council currently has a 5 year local connection criteria. London's highly insecure private rented market means that people are often forced to move home and borough on an almost regular basis meaning that it can be very difficult to build up a 5 year local connection. The 5 year local connection criteria negatively impacts migrant families who are less likely to have accumulated this time in the borough. Migrant families often face additional difficulties and discrimination when trying to find housing in the private rented sector and therefore are more likely to live in overcrowded and poor quality private housing. Often, they may have had already moved homes several times trying to improve their housing conditions making it harder to build up time in a particular borough. It is unfair that families with a housing need should face such a strict local connection criteria forcing them to remain in these unsuitable conditions for 5 years before they can even have the chance to join the housing register. The strict local connection criteria also hides the level of housing need in the borough and the real demand and need for social housing.

We propose that Lewisham council reduce their local connection criteria to 2 years which is in line with Lambeth council which is a neighbouring borough in south London facing similar housing challenges.

Concerns about the format and conduct of the consultation

We have strong concerns about the format and conduct of the consultation and call on Lewisham council to not implement any changes until they can repeat the consultation when Covid numbers are close to zero and there are minimal social distancing measures. Lewisham residents in housing need who are directly affected by the proposals in the consultation have faced enormous difficulties engaging with the consultation in its current form. In HASL, we have made our best efforts to support our members and others to engage with the consultation but it has been very challenging. We do not believe that Lewisham residents, particularly those most affected by the proposals, have had the opportunity to meaningfully engage with these significant changes.

The consultation has taken place during a lockdown and a peak of the Covid 19 crisis. Many families suffering from housing problems will have been preoccupied with daily living under lockdown, home schooling and looking after their health. Recent statistics from the [Office of National Statistics show that in September and October 2020, women spent 99% more time than men on unpaid childcare](#). The current crisis has made it incredibly difficult to engage with a consultation on the allocations scheme which feels very distant and abstract in the face of the current challenges they are facing. From our experience in HASL, women are usually those suffering at the worst end of the housing crisis and also at the forefront of organising against the housing crisis. Their ability to engage with the consultation process will have been severely compromised due to their increased caring responsibilities.

The lockdown has also made it more difficult to reach people in housing need directly affected by these proposals. The council is relying on online methods for sharing and conducting the survey, but this excludes many people who do not have access to or cannot use digital technology. Many are affected by the digital divide with unreliable internet access and rely on face to face contact for support. Off-line forms of engagement are really important but these have not been possible because of the lockdown. Our member Fowsiyo has attempted to contact Somali community organisations based in Lewisham but as their premises are closed, her calls were unanswered. She explains that under ordinary circumstance they would have been able to put a poster about the consultation in the mosque. Before Covid, we had physical group meetings twice a month where we would have discussed the consultation face to face. The council cannot

rely on a consultation which has only been conducted online with no off-line, in person support and outreach.

The online survey was originally only available in English, it was quite technical and difficult to understand (even for those who are familiar with the current housing allocations policy) and did not allow people to make their own feedback and suggestions. These issues have again made it difficult for people to engage with the consultation.

The online survey also contains misleading explanations. For example:

The consultation states:

We propose introducing a new 'overcrowded by three beds' rehousing reason. This will help us to be more successful in allocating properties to households who are in the most overcrowded situations.

We propose that:

- the new 'overcrowded by three bed' rehousing reason to be placed in band 2*
- the 'overcrowded by two bed' rehousing reason to be placed in band 3*
- the 'overcrowding by one bed' rehousing reason to be moved to a newly created band 4*

However, this is misleading as another proposal to help families overcrowded by three beds would be to place them in band 1. If the council pursued this option, it would not come at the expense of other overcrowded families who are missing 2 beds or 1 bed. Whilst the council acknowledge that those missing three beds are 'in the most overcrowded situations', families missing 2 and 1 beds are also severely overcrowded, with many of them meeting the legal definition of being 'statutory overcrowded'. It is misleading, unfair and dishonest for the council to claim to be helping those in the most overcrowded situations whilst doing this at the expense of families missing 2 or 1 beds who are also severely overcrowded.

Finally, moving 'overcrowded by one bed' into the newly created band 4 is not related in any way to helping families who are overcrowded by 3 beds – yet this is how the question is phrased. Families currently in band 3 for being overcrowded by 1 bed are already in a lower priority band to families who are overcrowded by 3 beds. Demoting families missing 1 bedroom to band 4 is a separate issue but it is framed as helping families missing 3 beds. The survey goes on to say:

In addition, we propose moving overcrowded by one bed to a new band 4. This is so that we are able to prioritise households who require larger properties.

But again, this statement is confusing and misleading because the council is already able to prioritise families who are overcrowded and require larger properties through the banding system.

The 'Smart letting' properties section is also misleading. The summary states:

The approach makes sure that we are fairly allocating the available housing to all applicants.

However, the housing allocations policy already exists to make sure that all social housing on Lewisham Homesearch is allocated fairly to all applicants. The 'Smart lettings' system facilitates queue jumping by residents in social housing who have 20% of properties ring-fenced when someone in private rented housing or temporary accommodation may be ahead of them on the housing waiting list.

As a volunteer-run group, we have dedicated a lot of time to thinking about the best and most accessible ways to engage with Lewisham residents most affected by the proposed changes. We have learnt a lot as we have tried and tested different methods. There are no simple or easy answers, but it is such an important consultation that we hope that the council will understand the need to give more time for this consultation to try to address the barriers we have highlighted.

Proposal: The council should extend the consultation to a time when Covid numbers are very low and meeting face to face is safe. The council should evaluate the information that has been submitted and use this to inform and relaunch the consultation ensuring there is targeted outreach to groups who are currently underrepresented in the responses. The council should re-write the survey with more balanced and open questions and should use offline methods to engage people directly impacted by the changes.

HASL template answers

We organised a special group zoom meeting with Spanish translation to speak with our members about the consultation and the online survey and how we wanted to respond. The zoom meeting was attended by families who were either in temporary accommodation or in overcrowded private rented housing. We discussed each question in the survey and collectively agreed a response. We also answered further questions and other proposals such as reducing the local connection residency criteria from 5 years to 2 years. We decided as a group that making these template answers would be the easiest way for people to respond to the consultation as they did not feel confident reading and responding to the online survey which was in English and which was very technical. Even with our template answers, a number of our members were unable to use these to complete the survey as they did not know how to copy and paste the template answers into the survey or they only had access to a mobile phone which makes this task very difficult. At another zoom meeting in March, we helped these members to complete the survey using the share screen function on zoom.

Due to the Covid pandemic and being a volunteer-led group with many other immediate tasks, we were not able to support our members and other Lewisham residents to engage with the consultation as much as we would have liked to and we are very concerned that lots of people directly affected by these changes have been able to meaningfully engage with the consultation.

Please do not hesitate to contact us on: haslcases@gmail.com

Yours faithfully,

Housing Action Southwark and Lambeth