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**DIRECTORATE / DEPARTMENT:** Operations /

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General Needs)

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## **Allocations Policy**

## 1. Purpose or Aim

- 1.1 The Regulator of Social Housing Tenancy Standard requires Registered Providers to let their homes in a fair, transparent and efficient way taking into account how their lettings:
  - Make the best use of available housing
  - Are compatible with the purpose of the housing
  - Contribute to local authorities strategic housing function and sustainable communities
- 1.2 The aim of this policy is to ensure that saha works in a way that is compliant with the regulatory standard whilst supporting the delivery of our vision and values
- 1.3 The policy aims to ensure consistent practice in the allocation and letting of our properties in line with local agreements and arrangements.

# 2. The following documentation and legislation can be relied on to supplement this policy:

- 2.1. Support Planning Policy.
- 2.2. Equality, Diversity and Inclusion Policy.
- 2.3. Data Protection Policy.
- 2.4. Safeguarding Adults and Children's Policies.
- 2.5. Foyer Allocation Criteria for specific schemes.

- 2.6. Sheltered Housing Allocation Criteria.
- 2.7. Supported Housing Allocation Criteria for specific schemes.
- 2.8. Occupancy Agreements Policy.
- 2.9. Voids Management Policy
- 2.10. Probity Policy
- 2.11. Housing Act 2004
- 2.12. Right to Rent Regulation 2019
- 2.13. Right to Rent in line with Immigration Act 2014
- 2.14. Right to Rent Guide 2020
- 2.15. Homeless Reduction Act 2017

### 3. Introduction

- 3.1. Saha provide a range of supported and general needs accommodation offering the most vulnerable in society safe, affordable homes and the support to enable them to thrive and to fulfil their potential.
- 3.2. This policy sets out how saha intends to allocate this accommodation and is our commitment to:
  - Making the best use of our available housing stock.
  - Contributing towards the sustainability of the areas that we work within.
  - Contribute to local authority housing strategies, support their duty to meet identified housing need and assist in meeting homelessness duties.
    - Providing social housing for those in most housing need
    - Provide quality supported housing for those at risk of homelessness

#### 4. Scope

- 4.1. This policy applies to all types of accommodation provided by saha including:
  - General needs accommodation for families, couples and single people
  - Foyer accommodation for young single people
  - Supported housing
  - Sheltered housing for people over the age of 55 years old

- Temporary housing for homeless people
- 4.2 This Policy covers all applicants who
  - register an interest in rehousing either directly with saha or via a Choice Based Lettings scheme which we are a partner of
  - are referred to supported housing by the local authority commissioner, another support provider/partner agency or through self-referral (where appropriate)
  - are referred to homelessness and refuge accommodation

## 5. Objectives

- 5.1. This policy aims to achieve the following objectives:
  - Work in partnership with Local Authorities to meet housing need of current and future residents.
  - Offer choice to residents in the location and type of their future home.
  - Help deliver sustainable communities
  - Make the best use of our housing.
  - Ensure that allocations are transparently and fairly made.
  - Minimise empty homes or rooms, and maximise access to those in need of accommodation.
  - Meet Right to Rent Requirements

#### 6. Definitions

- 6.1. **Allocation** is the process by which we select the applicant who will be offered a tenancy.
- 6.2. **Nomination** is the process used by some local authorities to refer applicants to housing organisations based on their housing need.
- 6.3. CBL Schemes are generally operated by local authorities and each will operate differently. It is a way of letting all social housing in an area in a consistent way. The common feature is that once someone has registered that they are looking for housing they will have to 'bid' (register their interest) for properties that become available, rather than waiting to be offered one. Based on an individual's circumstances they will be awarded a 'priority rating' and this will act as the deciding factor if several people 'bid' for the same property.
- 6.4. **Sustainable Communities** are places where people want to live and work, now and in the future.

- 6.5. **Lifehouse -** is a home that provides temporary accommodation for people who are homeless.
- 6.6. Supported Housing-Supported housing is any housing scheme where housing, support and sometimes care services are provided as an integrated package. Some schemes are long-term, designed for people who need ongoing support to live independently, others are short-term, designed to help people develop the emotional and practical skills needed to move into more mainstream housing.
- 6.7. **Right to Rent Checks** The legal duty that saha, as a landlord, must complete before letting a property to ensure all adults who will reside at the property in which they may be allocated have the 'right to rent'.

## 7. Policy Statement:

#### 7.1. Supported Housing

- 7.1.1. Lettings to vacancies within our supported housing schemes including homelessness, refuge schemes and foyers are made via referral from a local authority, the National Domestic Abuse Database, other support provider or self-referral
- 7.1.2. Each supported housing scheme has a referral procedure and allocation criteria which must be followed in all instances

#### 7.2. Tackling Homelessness

- 7.2.1. We have a responsibility to ensure that the people most in need of our accommodation and services are able to access them. We aim to provide a fair and transparent lettings process to meet the needs of new and existing customers whilst contributing to, and building, sustainable communities.
- 7.2.2. We aim to provide an efficient lettings service that meets our aims, the needs of our customers and the communities we serve. This means we will give customers clear and relevant advice to help them meet their needs and we aim to minimise the time that homes remain empty in order to assist those in housing need and minimise loss of income to the association.
- 7.2.3. We will work in partnership with local authorities to help meet their role in tackling homelessness and meeting local housing need and at the same time making the best use of available housing. We will embed the prevention of homelessness and tenancy sustainment within our key housing management policies.
- 7.2.4. We will participate and co-operate with any local authority that has, or wishes to introduce, a choice-based lettings scheme or a common housing register for social housing tenancies in their area where it is in the interests of our customers. The only exception to this practice may be where the Association takes direct referrals from our agency managed or supported housing services, to provide permanent move-on accommodation to residents living in temporary accommodation, and we can demonstrate clear value for money. In

- negotiating with local authority partners about choice-based lettings schemes, we will always try to reserve some vacancies for our internal transfers and make sure that vulnerable residents are given every opportunity to take advantage of the scheme.
- 7.2.5. Where choice based lettings schemes are not in operation, we will liaise with the local authority regularly to review the allocations or nominations to meet local needs
- 7.2.6. We will support our customers as far as possible to choose where they want to live and we aim to match the right person with the right property first time.
- 7.2.7. We will use our supported housing schemes to support the most vulnerable in our society reducing their risk of homelessness and working to prepare them for their own independent sustainable tenancy.
- 7.3. We will consider applications from the following:
  - 7.3.1. Nominations from local authorities our nominations agreements with local authorities offer between 50 and 100% of lettings to people nominated by local councils the percentage will depend on the local authority. Where a local authority has 100% nomination rights and a CBL scheme, customers will need to join the CBL scheme.
  - 7.3.2. Nominations from approved and publicised referral agencies saha maintains a register of agencies that can refer customers to specific properties.
  - 7.3.3. **Internal transfers** in most areas saha has retained the right to allocate up to 50% of our empty properties. In these areas we hold a waiting list for people wishing to transfer to another saha property
  - 7.3.4. **Decants** tenants of saha who need to move temporarily from their home, usually due to major works, fire or flood.
  - 7.3.5. **Mutual exchanges** we ensure our assured and secure tenants understand their right to exchange, we are members of Homeswapper, a national exchange service to help our residents find someone to exchange with.
  - 7.3.6. **Move-on** we provide temporary agency managed services and shared accommodation helping people live independently, often for the first time.
  - 7.3.7. **Referrals** some designated properties are part of initiatives or arrangements where referrals are made for vacancies. These referrals come from agreed referral agencies referring people whom the scheme aims to assist.
  - 7.3.8. **Direct lettings** where local authorities are unable to provide nominations to some of our sheltered schemes and low demand properties we advertise and take direct applications.

## 7.4. Eligibility criteria for a saha home

- 7.4.1. We operate eligibility criteria for our homes to ensure a fair and transparent system for assessing all applicants for housing, whether through a nomination, referral, move-on, transfer, exchange or direct letting. The criteria will generally depend on the type of housing; to be eligible applicants must meet the following criteria:
  - Be over 18 years of age for general needs accommodation in exceptional circumstances we house 16- or 17-year olds.
  - Be over 55 years old for sheltered (only one person in a partnership must be 55);
  - Be in housing need.
  - Have the 'Right to Rent' in line with the Immigration Act 2014
  - Be in line with contractual requirements (for a supported housing scheme)
- 7.5. We do not automatically exclude people and will consider the circumstances and need in each individual case, e.g., in cases of rent arrears we will consider cases where the applicant(s) can demonstrate that they have taken steps to rectify the situation, however applicants who meet the above criteria **may** be rejected for the following reasons:
  - A tenant or owner of another home.
  - Have unmet support needs which we cannot meet or risks which we cannot manage
  - Provided false or misleading information in their application.
  - Have outstanding rent arrears with saha or another landlord and the debt is not being repaid.
  - Have broken the terms of a previous tenancy with ourselves or another landlord and we or the landlord has taken legal action, for example, anti-social behaviour.
  - Under or over occupation of the property allocated to.
  - Do not meet the specific criteria for a disabled property, sheltered, supported, foyer or other accommodation designed for specific groups.
  - Do not have the 'Right to Rent'.
  - Do not meet criteria under the Local Lettings Policy
- 7.6. In some cases, we will ask applicants who are ineligible for housing due to for example anti-social behaviour in our neighbourhoods or previous evidence of failed tenancies to work with appropriate support workers or agencies before approaching us again to consider their application. We

- will be clear about what action we advise them to take before we will reconsider their application
- 7.7. Supported Housing projects, Foyers and Homeless services have their own set of eligibility criteria based on local service level agreements and contracts.

## 7.8. Assessing applicants

- 7.8.1. Direct applicants, move-on applicants, transfer applicants and applicants for supported housing will be assessed to help determine need and priority. Properties are offered to suitable applicants who are in the highest band/have the highest number of points.
- 7.8.2. We carry out assessments to transfer, referral and direct applicants to verify circumstances, complete a vulnerability matrix and discuss options. We assess all applicants against our eligibility criteria. Whilst we give preference to those in housing need, we may also consider the needs of the wider community and use information provided to us by other agencies as part of this process.
- 7.8.3. The decision to allocate a specific property will include an overall assessment of the potential sustainability of the tenancy and its contribution to maintaining a sustainable community. In some areas we may agree a Local Lettings Policy with residents and the local authority and lettings will be made in line with that policy.
- 7.8.4. We aim to support people into independent living and create sustainable communities. To achieve this, we need to ensure that people are getting the support they need. Where an applicant is identified as vulnerable, we will request information on the support that they are receiving. Where we believe support is inadequate for the type of accommodation available, we may refer the applicant to a support provider.
- 7.8.5. Where an applicant is referred to accommodation specifically designed to support them in independent living, we will carry out a needs assessment. This assessment is designed to ensure that, working with other agencies, the appropriate support is provided at the times and frequency required to enable the tenancy to be sustained. This assessment is not used as a basis for rejecting an applicant, rather a tool to consider any support we can put in place so that we can include them.
- 7.8.6. Where we reject an application for housing, this rejection will be approved by a service manager/team leader. We will always give clear reasons why an application has been rejected and provide the applicant with information on alternative options.

#### 7.9. Right to Rent

7.9.1. In accordance with the Immigration Act 2014, saha will carry out the necessary tasks to ensure that all prospective occupants of one of our properties has the right to rent. (With the exception of lets made through nomination agreements through a local authority or arising

- through a homelessness or social services duty where we will assume that the local authority has made the appropriate checks.)
- 7.9.2. Checks will be made to ensure that the individual has the appropriate immigration and/or other related permits, visas, and identification to reside in the UK. (The original documents must be seen). Copies will be taken and securely stored in accordance with data protection legislation.

## 7.10. Consideration of property size and type

- 7.10.1. We will maximise the use of our stock being mindful of issues such as the size and designation of the property.
- 7.10.2. In determining whether a property is suitable in terms of size, a separate bedroom is deemed necessary for:
  - A cohabiting couple.
  - A parent in a single parent family.
  - Each adult over 18.
  - Children over 10 of different sexes.
  - More than two children whatever age or sex
- 7.10.3. Generally additional bedrooms will only be allocated to those with equal access or staying contact with children. Evidence of an agreement will be required. However, consideration will also be given to affordability for that applicant of a larger property before it is allocated to them
- 7.10.4. we will take into account unborn children where proof of pregnancy is provided (a verified MATB1 form)

#### 7.11. Under-occupation

- 7.11.1. saha will work to address under occupation and overcrowding in the homes we provide.
- 7.11.2. saha has a predominance of single person accommodation, however in areas where we have family accommodation, we will work in partnership with the Local Authority to offer incentives that may make a property available for a larger household where underoccupation has been identified.
- 7.11.3. Saha will not allocate a home for which the household would be under occupying the property. The exception to this would be where it is clearly evidenced that the under occupation would cease within three months of the tenancy commencement, for example where an additional member will be joining the household such as a returning member of the armed forces.

#### 7.12. Transfers

- 7.12.1. Existing tenants have the right to transfer subject to satisfactory completion of their starter tenancies.
- 7.12.2. Transfer applicants will be subject to the same assessments on eligibility as other housing applicants when establishing their priority although in special circumstances the Head of Housing can give additional priority or approve direct matches where it is deemed necessary.
- 7.12.3. Transfer applicants will be expected to have conducted their tenancy in a satisfactory manner including cooperating with a pre-termination inspection to assess the upkeep of their property except in exceptional circumstances.

## 7.13. Suspensions

- 7.13.1. Suspensions occur where applicants currently do not meet the criteria for different Choice Based Lettings schemes. These will vary depending on the scheme but usually involve rent arrears, antisocial behaviour or criminal convictions which are relevant to the applicant living in a particular neighbourhood or locality. Reasons will always be provided for suspension and will identify what the applicant must do to improve their situation and to qualify for the waiting list.
- 7.13.2. Appeals against suspensions will be dealt with as part of our appeals process where we are an administering partner of a choice-based lettings scheme; they may be passed onto relevant partners where we do not register or manage applications as part of the scheme.

#### 7.14. Local Lettings Plans

- 7.14.1. Local Lettings Plans may be established for specific schemes in exceptional circumstances following consultation with residents, local authorities and key stakeholders.
- 7.14.2. There must be a clear identified benefit, for example high levels of empty properties or severe anti-social behaviour issues.
- 7.14.3. Care must be taken to ensure that such plans are not discriminatory

#### 7.15. Making offers

- 7.15.1. When we make an offer of housing, we will always give applicants details of the accommodation and an opportunity to view the property, with a member of our team available to answer questions and point out any specific features. In the case of supported housing applicants, they may also have the opportunity to meet other service users who will be sharing the accommodation. At this stage we will give a copy of our minimum lettings standard for our empty properties and an information pack about the property and the area, including a copy of the tenancy agreement.
- 7.15.2. For general needs allocations, we will give an applicant at least 7 calendar days to make a decision about the property offered to

them. Where the property is accepted, we will arrange for the tenancy to be signed at our offices, digitally, or at the property. At the sign-up interview, we will give further information on saha's policies and procedures and collect information from the new tenant, including their preferred method of receiving future information and communication.

7.15.3. Follow up visits one month after moving in are carried out for all new general needs tenants to ensure that they have settled into their new home, to give them an opportunity to ask questions and to identify any issues with the tenancy or any support needs.

# 7.16. Allocations to employees, their relatives, or Salvation Army personnel

7.16.1. saha wishes to maintain the highest standards of integrity by not giving non contractual benefits to our employees, board members or their families or those of our parent organisation, The Salvation Army. We do this by ensuring we do not grant tenancies where this is not a contractual part of the job or, in relation to The Salvation Army, there is significant social benefit to the local community in doing so. In certain circumstances a tenancy may be granted but this would be carefully considered, with the benefit of doing so quantified and approved by the Executive Management Team and reported to the Board. Any lettings to staff, relatives or Salvation Army personnel will be subject to the same rent levels that would be expected from any applicant.

## 7.17. Appeals Process

- 7.17.1. If an applicant is not happy with how their application for rehousing has been dealt with they can appeal this decision using saha's complaints process.
- 7.17.2. This process can be used by anyone who receives a service from the Association.
- 7.17.3. Where complaints relate to applications or decisions made by other choice-based lettings partners we will refer the applicant back to the partner organisation that has either registered or made the decision.

## 8. Monitoring and Reporting

- 8.1. We have a set of service standards or promises for our allocations and lettings service. We monitor these through regular feedback from new residents, spot checks and audits. We report back to employees and residents through our regular newsletters.
- 8.2. We monitor that our homes are speedily and fairly let by:
  - 8.2.1. Setting ourselves clear targets for letting homes that are monitored regularly.

- 8.2.2. Running weekly management reports to identify progress on letting empty properties.
- 8.2.3. Producing quarterly Key Performance Indicator (KPI) information that is reported to Board.
- 8.2.4. Producing monthly Tenancy Sustainment information to identify issues or trends which may impact negatively on our allocations.
- 8.2.5. Publicising performance information to residents via the quarterly newsletter.
- 8.2.6. Working with the local auditing and quality control systems put into place by local commissioners.
- 8.3. We monitor satisfaction with our lettings service through a follow up feedback survey of all new tenants. We feedback the results to residents through our newsletter and use the information to help improve our service.
- 8.4. We record all lettings in the Continuous Recording of Lettings (CORE) system for monitoring the characteristics of all RP lettings.

## 9. Implementation

- 9.1. saha will ensure that the implementation of this policy is proactively inclusive across all activities with particular attention towards the protected characteristics as defined in the Equality Act 2010 whilst also being mindful towards the inclusivity of other vulnerable and marginalised groups that may be affected.
- 9.2. We will keep applicants informed at all stages of the lettings process using the most appropriate method of communication requested by the applicant, for instance translated information, keeping the applicant informed by phone or involving an advocate.
- 9.3. We aim to provide a fair and transparent lettings service that is inclusive. To ensure that we achieve this we will monitor our lettings. Where our lettings are not reflecting the diversity of local housing needs, we will identify action that we need to take.

#### 10. Roles and Responsibilities.

#### 10.1. Residents Responsibilities

- 10.1.1. This policy applies to applicants who are not currently residents and our residents who wish to transfer or exchange. All applicants, whether residents or not, are required to:
  - Be honest on their application forms and at their interviews in order that we can investigate support needs appropriately.

 Work with us in providing details to all agencies required to be involved in the allocations process and to attend meetings/appointments when agreed.

## 10.2. Employee Responsibilities

- 10.2.1. The Executive Director of Operations is responsible for the overall implementation of the Allocations policy and the Head of Housing (Supported and General Needs) will have direct responsibility in ensuring that the policy is implemented effectively. All officers dealing with allocations are responsible for ensuring that:
  - The property is advertised in the most appropriate place for letting as soon as is practicable
  - Local lettings plans and allocations agreements are adhered to.
  - That local procedures for referral and acceptance onto support housing schemes are followed.
  - All information on the letting is recorded accurately and appropriately to demonstrate a transparent process and allow for future scrutiny.
  - The applicant is kept informed appropriately at every stage of the process and decisions are clearly explained.
  - The applicant is given a right of appeal if they feel they have not been fairly treated or disagree with a reason for them having been refused accommodation.

## 11. Policy Review

11.1. We will review the operation of this policy in consultation with our residents, staff and relevant stakeholders (where appropriate), in light of current best practice, amending the policy where required.

## **Document History Log**

Lead	Date				Ver	sion	Approval			
Reviewer	Created	Revised	Expiry				Ву	7.10	Date	
Р	21/10/2010				1	.0		toring	21/10/2010	
Latham						Comn				
Р		20/11/2013	November		1	.1	EMT		26/11/2013	
Latham			2016							
Р		30/03/2016	March		1	.2	Managemer		30/03/2016	
Latham			2017				Change			
A Patel			April 2017		1	.2	Management		11/11/2016	
							- Policy Extension			
S		11.01.2017	February		1	.3				
Haslam			2020							
BSO		Nov 2018	Feb 2020		1	.4	HoCS		10/12/18	
(Right to										
Rent)										
HoH		March	March		1	.5	SN	ΛT	17/03/21	
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BAM	Legislative			March		.5				
Reference			2024							
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If Negative impact is identified, please complete The Full EMF, including mitigations of risks section, and return to Business Assurance Team.										
Privacy Impact Assessment Form Privacy Data Impacting Timescales for Notes:										
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