

Allocations Policy

Linked strategies	Live Proud, Live Happy and Live Safe
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Policy level	1
Agreed by Union	Not applicable
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Date of next review	March 2026
Policy Owner	Head of Property Investment, Sales and Lettings

1 Policy Statement

- 1.1 People are at the heart of everything we do. We'll provide homes where customers feel safe and will let our homes to shape places that people are proud of and neighbourhoods where people want to stay.
- 1.2 Within our core stock holding of Wellingborough, we will let our properties in accordance with the Nominations Rights Deed which forms a legally binding agreement with North Northamptonshire Council (NNC) and where a Service Level Agreement is in place by using the appropriate Choice Based Lettings (CBL) system.

For other areas where we operate, West Northamptonshire Council (WNC), we will adhere by the local authority Housing Allocation Policy.

The allocation of homes on new development sites will be subject to the S106 and criteria as set out in the Local Lettings Plan.

- 1.3 We will aim to be responsive to individual needs and preferences, considering relevant diversity and support issues. Our approach to lettings will be transparent, flexible, fair, non-discriminatory and effectively managed.
- 1.4 We will participate in national, regional and local exchange schemes so that those wishing to move are given every possible opportunity to find a home which suits their needs and/or preferences.

2 Scope

- 2.1 This policy applies to new applicants seeking to be housed by Greatwell Homes alongside existing customers of Greatwell Homes who wish to transfer within our housing stock.
- 2.2 This policy only applies to social and affordable rent tenancies. Market rent properties do not form part of our affordable housing stock and are not subject to nomination rights by the local authority.
- 2.3 The allocation of temporary accommodation is covered by a separate service level agreement. Shared ownership and Rent to Buy tenures are covered by our Home Ownership policy and RentPlus tenancies are governed by the conditions set out within the Collaboration Agreement.

3 Definitions

- 3.1 <u>Choice Based Lettings (CBL)</u> These schemes are usually established by partnerships of local authorities and housing associations. CBLs are designed to introduce an element of choice for people who apply for council and housing association homes by requesting applicants to place bids on properties they are interested in. Amongst those who have placed a bid, the allocation of the property is based upon a priority-based assessment of need.
- 3.2 <u>Nominations Rights Deed</u> An agreement between a housing association and local authority in which the two organisations agree to work in partnership to address housing need in the local area. The agreement sets out an agreed percentage of properties that the local authority can nominate applicants from the waiting list to, with the remaining percentage being let by the association.
- 3.3 <u>Local Lettings Plan (LLP)</u> Agreed local plans for the allocation and letting of homes within a community, specific location or across types of properties. These are agreed between the local authority and housing association, with the aim of ensuring that a community is balanced and promotes cohesion.
- 3.4 <u>Section 106</u> An agreement between a local authority and developer which sets out the obligations linked to planning permission. For housing development sites, this will stipulate the number and tenure of affordable homes to be delivered, as well as any undertaking in terms of nominations for these homes.
- 3.5 <u>Internal Transfers</u> This covers management moves, direct lets and customers who have been decanted but subsequently request to remain in the property. It does not cover mutual exchanges, which are covered under the Mutual Exchange Policy.

4 Policy Principles

- 4.1 Through operation of this policy, we will demonstrate compliance with our duty under S170 of The Housing Act (1996) which obliges social landlords to work cooperatively with local authorities to offer accommodation to those in priority housing need.
- 4.2 We will ensure we are compliant with our obligations with the Nominations Rights Deed that was agreed as part of the Transfer Agreement and subsequent stock acquisitions, and also with any agreements made as part of new housing developments. We will operate in accordance with the relevant local authority Housing Allocations Policy.

- 4.3 We will ensure compliance with the relevant legislation and regulation, specifically the Tenancy Standard.
- 4.4 Through the operation of this policy, we will demonstrate effective use of our housing stock to meet the needs of applicants and customers.
- 4.5 We will be fair and transparent in the allocation of housing to applicants and customers and have a clear and auditable process in cases where housing is offered to staff, Board members or those closely connected to them.
- 4.6 The types of tenancy we will provide are set out in our Tenure Policy which should be read in conjunction with this policy.
- 4.7 Through application of this policy, we will seek to support the <u>Homes for Cathy</u> commitments aiming to reduce homelessness and providing secure homes.

5 Housing Register

- We will make use of the housing register, managed by, or on behalf of the relevant local authority. For North Northamptonshire Council this is working through Keyways.
- In doing so, we recognise that different local authorities may have different policies in place to reflect local issues of supply and demand.

6 Allocating Homes

- Applicants will bid for homes in accordance with the rules associated with the relevant CBL scheme or other allocation arrangements put in place by the Local Authority.
- 6.2 As part of the registration process, the local authority will assess each applicants' circumstances and support needs.
- 6.3 Applicants nominated to Greatwell Homes by the local authority will have their circumstances and support needs assessed by the Lettings Team before an offer of accommodation is made.
- 6.4 This assessment will evaluate issues such as affordability, sustainability, any conduct either in their current or previous tenancy as well as any support needs.

- Nominees assessed as 'medium' or 'high' risk will be referred to senior officers within the Lettings Team to agree what measures need to be put in place to minimise the risk of tenancy failure.
- 6.6 Ultimately, Greatwell Homes reserves the right to refuse a nomination if the evidence shows the tenancy on offer is unlikely to be sustainable, further details on refusals is outlined in Section 8 below. In these circumstances we will provide the nominee with our reasons, alongside advice on what they can do to improve their situation.
- 6.7 In cases where an offer of accommodation is recommended in conjunction with partnership forums (such as Multi Agency Risk Assessment Conference MARAC) we will ensure that a robust risk assessment is completed by the relevant agencies prior to any offer being made to ensure the property is both suitable to the applicants needs whilst also not presenting unacceptable risks to residents and customers.

7 Offers of Accommodation

- 7.1 All applicants made an offer of housing will be;
 - Made an offer in writing.
 - Given the opportunity to view the property.
 - Provided with information about the type of tenancy to be offered.
 - Provided with information about the rent and service charges payable.
- 7.2 Any applicant(s) found to have deliberately and / or knowingly provided false information as part of an application for housing will not be offered a tenancy and we will refer the applicant to the local authority to consider closing their application for housing.
- 7.3 If a tenancy has already been granted by the time that the false information is discovered then we will consider legal action to gain possession of the tenancy using Ground 17, Schedule 2 of The Housing Act (1988) amended 1996.

8 Refusals

- Whilst we will consider each individuals' unique circumstances and history when making decisions relating to suitability, we may refuse a nomination for housing in the following circumstances;
 - 1. Where the applicant, or a member of their household wishing to be housed

with them, has engaged in and/or has been found guilty of unacceptable behaviour within the last 3 years, where such behaviour is considered serious enough to make them unsuitable to be a tenant of the Association.

Behaviour will be deemed as unacceptable if, had the applicant/s or a member of their household been at the time a tenant of Greatwell Homes, possession would have been sought.

- 2. There is evidence of rent arrears within the last 18 months. In such cases we will reconsider the nomination where the debt is cleared in full or where we can see consistent payment to repay the debt over a six-month period.
- 3. The applicant owes former tenant arrears to Greatwell Homes in excess of £250. In such cases we will reconsider the nomination where the debt is cleared in full or where we can see consistent payments to repay the debt over a six-month period.
- 4. There is evidence of wilful neglect or damage of a previous property within the last 18 months.
- 5. We believe that the applicant would not be able to sustain a tenancy for example due to affordability reasons or the level of support required is above what we are reasonably able to provide (ourselves or via partners).
- 6. The applicant is shown to be making a false or fraudulent application that deliberately created their position of housing need.
- 7. If an offer of a tenancy would conflict with our charitable status, our objectives or our code of conduct.
- 8. Where an applicant has applied for or has a Debt Relief Order (DRO) in place.
- 9. Where the property is not suitable for the applicant and adaptations required would be unreasonable and/or not in line with our Adaptations Policy.
- 8.2 Any decision by Greatwell Homes not to proceed with an offer of a tenancy will be shared with the relevant local authority in writing who will advise the applicant and confirm the reasons for refusal.

9 Local Lettings Plan

- 9.1 In the interest of sustainable or manageable communities, we may implement a local lettings plan from time to time in agreement with the relevant local authority.
- 9.2 Local lettings plans may be applied in connection with planning conditions for new developments or to manage emerging issues in an area.

10 Internal Transfers

- 10.1 The Nominations Rights Deed, which forms part of the Transfer Agreement reserves 25% of void properties for internal transfers.
- 10.2 Greatwell Homes does not hold an internal transfer list. All internal transfer requests must come via the Management Move Panel to be assessed.

11 Management Moves

- 11.1 We retain the right to carry out management moves or 'direct lettings' within our stock where individual circumstances require a letting outside of our established policy. This might be in circumstances where a customer is fleeing violence or significant harm, or where a property has certain adaptations that would benefit a customer with additional needs.
- 11.2 In cases such as these, we will seek independent evidence from partner agencies and other professionals to highlight the need.
- 11.3 We will also consider a management move for customers who have held a tenancy with us for more than 12 months who require a move to another property, managed by Greatwell Homes, where we have assessed their circumstances and deem their existing property as unsuitable for their needs.
- 11.4 In exceptional circumstances we may waive the 12-month criteria.
- 11.5 Management move applications are conditional upon the customer fully adhering to the terms of their tenancy agreement. This covers the payment of rent and other housing related charges (such as rechargeable repairs) and the condition of the property and garden.
- 11.6 Where customers are found to be in breach of their tenancy agreement, they will be given a reasonable amount of time to rectify the breach. In cases where the breach is not remedied in the agreed timescale, the offer may be withdrawn, and further offers will not be made until the breach is remedied.

11.7 In circumstances where we need to temporarily transfer a customer in an emergency (such as a fire, serious flood or redevelopment), we will apply our Decant Policy and procedure which are separate to this policy.

12 Independent Living

- 12.1 Independent Living accommodation is designed to help customers remain independent with choice and control over their own lives. Tiered levels of support are available which is flexible to meet the changing needs of customers over time.
- 12.2 Allocations for independent living properties are subject to local lettings policies.

13 Allocations to Staff Members, Board Members and their close relatives

- 13.1 In cases where a nominee is a member of Greatwell Homes staff, or a Greatwell Homes Board member, we will ensure that the service provided is consistent with other applicants and no preferential service is given.
- To ensure transparency, all offers of accommodation made to staff, or their close relatives will be reviewed by the Sales and Lettings Manager and signed off by the Head of Property Investment, Sales and Lettings.
- 13.3 All offers of accommodation made to Board members, or their close family will be reviewed by the Sales and Lettings Manager and signed off by the Executive Director.
- 13.4 In all cases a Declarations of Conflict of Interest form will be completed in accordance with the Disclosure of Interests and Gifts and Hospitality Policy.

14 Feedback, Comments and Complaints

- 14.1 Complaints or queries made in relation to an applicant's current circumstances, waiting time or banding will be managed by the relevant local authority in accordance with their policy.
- 14.2 Complaints or queries made in relation to services provided by Greatwell Homes in relation to this policy will be managed in accordance with our Customer Concerns and Complaints Policy.
- 15 Implications for customers and staff (data protection info sharing and confidentiality)

15.1 A PIA has been completed for this policy and is available upon request.

Implications for customers include possible upset caused by disclosing personal information (such as previous criminal or anti-social behaviour, or medical information) which is used to determine their suitability for a property and the collection of data that is not relevant for the intended purpose.

These risks are mitigated by ensuring that staff apply good standards of customer care and ensuring that appropriate data sharing agreements are in place.

15.2 Equality Impact Assessment

An EIA has been completed and is available on request. The outcome of the assessment has identified that there is a positive impact for some customers as we are currently allocating homes based on each applicants' circumstances, considering relevant diversity and support needs.

Our service delivery ensures access to translation services where English is not the first spoken language, to assist with the assessment and application process where needed.

18 Performance Management

- 18.1 We will make use of the following performance information to monitor and report on the effectiveness of the service.
 - Weekly voids and lettings reports showing the cumulative totals for monitoring the 25% / 75% split of lettings between NNC nominations and internal transfers.
 - Quarterly reports to Board showing average re-let times.
 - Regular reporting to the Government via the CORE website.

19 Responsibility and Decision Making

19.1 The table below illustrates the structure for responsibility and decision making in relation to this policy.

Person Respon	nsible	Scope
Head of	Property	Overall responsibility for ensuring that all
Investment,	Sales and	activities are undertaken, and all performance
Lettings		measurements are met.

	 Responsible for signing off offers of accommodation made to staff and Board members.
Sales and Lettings Manager	 Responsible for the day-today application and adherence to this policy. Responsible for ensuring that void periods are minimised.
Senior Sales and Lettings Officers/ Lettings Officers	 Responsible for conducting pre-tenancy interviews with nominees and assessing risk of tenancy failure. Responsible for conducting viewings at void properties. Responsible for ensuring that records are up to date. Responsible for liaising with the local authority to receive and manage nominations. Responsible for the allocation of market rented properties.

20 Review

This Policy will be reviewed every three years or in line with changes in legislation, whichever is the sooner. Updates or recommendations for changes will be presented to the Board for approval.

Associated Policies	Associated Procedures
Local Authority Allocations Policies	
Tenure Policy	Tenure Procedure
Tenancy Changes Policy	Tenancy Changes Procedure
Mutual Exchange Policy	Mutual Exchange Procedure
Adaptations Policy	Adaptations Procedure
Customer Concerns and Complaints Policy	Customer Concerns and Complaints
	Procedure
Decant Policy	Management Move Procedure
Home Ownership Policy	Home Ownership Procedure