



## **Allocations Policy**

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

# Our Vision, Our Values, Our Strategic Objectives

## Our Vision

A vibrant neighbourhood where everyone can prosper.

## Our Values

Caring, Reliable, Fair, Open and Adaptable

## Our Strategic Objectives



## Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

## Executive Summary

### Policy Author

This policy has been developed by the Housing Manager.

### Purpose of the Policy

The Allocations Policy provides guidance to applicants, tenants and staff on how Elderpark Housing Association (EHA) allocates its properties.

### Aims and Objectives of the Policy

The objectives of the Allocation Policy are as follows:

- To let our houses in an open and fair manner to people with diverse housing needs.
- To provide open access to our housing list and enable people to exercise choice about where they want to live.
- To help make EHA neighbourhoods vibrant and sustainable places for our tenants to live.
- To give high priority to addressing homelessness.
- To make the most effective use of available housing stock, and manage the turnover of lettable properties in an efficient manner.
- To comply with all statutory and regulatory requirements relating to housing applications and allocations.

### Legislative and Regulatory Compliance

EHA will assess housing applications and let our properties in line with all applicable legal and regulatory requirements.

The main legal requirements relating to housing applications and lettings are set out in the Housing (Scotland) Act 1987, as amended by the Housing (Scotland) Act 2001 and the Housing (Scotland) Act 2014. In addition, the Scottish Government has published statutory guidance that applies to housing allocations

We also protect your rights by meeting the legal requirements set out in other legislation, including:

- Human Rights Act 1998
- Data Protection Act 2018
- General Data Protection Regulation (GDPR)
- Matrimonial Homes (Family Protection) (Scotland) Act 1981
- Children Scotland Act 1995
- Civil Partnership Act 2004

- Immigration and Asylum Act 1999
- Protection from Harassment Act 1997
- Management of Offenders etc (Scotland) Act 2005
- Equality Act 2010
- Adult Support and Protection (Scotland) Act 2007

#### Scottish Social Housing Charter

Our policy also takes account of the Scottish Social Housing Charter. The SHR use the outcomes and standards in the Charter to assess the performance of social landlords.

The key outcomes that have been considered in the development of this policy are:

#### **Outcome 1 - 'Equalities'**

- EHA support the right to adequate housing;
- Every tenant and other customer has their individual needs and rights recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

#### **Outcome 2 - 'Communication'**

'Tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides'.

#### **Outcome 3 - 'Participation'**

Tenants and other customers are offered a range of opportunities that make it easy for them to participate in and influence their landlord's decisions at a level they feel comfortable with.

#### **Outcomes 7, 8 and 9 - 'Housing Options'**

- People looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them;
- Tenants and people on housing lists can review their housing options;
- People at risk of losing their homes get advice and information on preventing homelessness.

#### **Outcome 10 'Access to Social Housing'**

People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and their prospects of being housed.

## Outcome 11 'Tenancy Sustainment'

Tenants get the information they need on how to obtain support to remain in their home; and ensure suitable support is available, including services provided directly by the landlord and by other organisations.

## Equalities

We promote equal opportunities throughout all of our housing services; including our allocation policy and related procedures. We seek to ensure that priority for housing is based on housing need and that our policies are fair and accessible to everyone applying for a home or living within our communities.

### Equality Impact Assessment (EIA)

An EIA is a tool to help identify whether or not policies, practices, procedures and services have an adverse impact on a particular community or group of people. We completed an EIA for this allocation policy to identify any barriers that could detrimentally affect under-represented communities or groups who may be disadvantaged by the way we carry out our business.

The EIA process focuses on the 'protected characteristics' as outlined in the Equality Act 2010.

These are:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

As a result of the EIA, we have put some positive actions in place and will continue to review these:

- publishing the allocation policy in other formats and other languages, as required
- auditing the allocation policy against equality standards (plain language, accessible formats and so on)
- publicising the allocation policy widely to promote access to our housing list
- working with other organisations to promote equality objectives

## Privacy

Any personal data collected will be in line with GDPR requirements and accessible only by those who require this information for specific purposes.

## Related Policies

Policy Title	Location
Mutual Exchange Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H8 Mutual Exchange Policy.pdf</a>
Succession Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H17 Succession Policy.pdf</a>
Assignment Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H22 Assignment Policy.pdf</a>
Domestic Abuse Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H13 Domestic Abuse Policy.pdf</a>
Tenancy Sustainability Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H19 Tenancy Sustainability Policy.pdf</a>
Antisocial Behaviour Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H3 Anti-social Behaviour Policy.pdf</a>
Letting & Void Management Policy	<a href="#">V:\Elderpark Policy Suite\Housing Management Policies\H20 Letting and Void Management Policy.pdf</a>
Entitlement, Payments and Benefits	<a href="#">V:\Elderpark Policy Suite\Governance Policies\G16 Entitlements, Payments and Benefits Policy.pdf</a>
Equality & Diversity Policy	<a href="#">V:\Elderpark Policy Suite\Governance Policies\G13 Equality and Diversity Policy.pdf</a>

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## 1 Introduction

Elderpark Housing was established in 1975 and currently owns approximately 1341 homes with the majority being in Central Govan although we also have a number of properties within the areas of Ibrox, Kinning Park and Cessnock.

Elderpark's approach to letting our properties aligns with our vision, to create vibrant neighbourhood where everyone can prosper.

## 2 Access to Housing

The law entitles anyone aged 16 or over to be admitted to EHA housing list. People will be able to contact us at any time about applying for a home, and the housing list will remain open to new applicants at all times.

We will assess applications in accordance with the points system shown at Section 4 of this policy. Our assessment will reflect the statutory conditions summarised at the start of this policy.

### 2.1 Factors that will be considered when applying for housing

When assessing your application for housing the following factors will/ will not be taken into consideration:

<b>Factors that are taken into consideration when applying for housing:</b>	<b>Factors that are not taken into consideration when applying for housing:</b>
<ul style="list-style-type: none"><li>• You owe a landlord more than one month rent charge, and you have not agreed to repay what you owe and haven't made at least three monthly payments towards the money you owe when you said you would pay.</li><li>• You need to get support from, or give support to, a family member or carer to help you or a member of your family or carer to live independently.</li><li>• You have a social or health reason to move into our area.</li></ul>	<ul style="list-style-type: none"><li>• Whether you live in our area and how long you have lived there.</li><li>• Any debts that are not related to your current or former tenancy (Council or registered social landlord tenancies).</li><li>• Any debts you have already repaid.</li><li>• Debts related to your tenancy if they are less than 1 month months' rent charge; or you have already arranged a repayment plan and have kept it for at least three months and you are still keeping to it.</li></ul>



<ul style="list-style-type: none"> <li>• You are being harassed or abused where you live.</li> <li>• You need to move into the area to help sustain employment/training.</li> <li>• You are threatened with homelessness.</li> <li>• You are living in a property that is below tolerable standards.</li> <li>• You are living in a property that is overcrowded/under occupied.</li> </ul>	<ul style="list-style-type: none"> <li>• You and/or your family's income (including any benefits you receive).</li> <li>• Your age, as long as you're over 16, and the home you want has not been designed or adapted as older persons housing.</li> <li>• Who you live with at the time you apply for housing.</li> </ul>
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## 2.2 Suspension from Housing Register

In some specific circumstances, applicants may be suspended from the housing register. We have a clear process in place which sets out the criteria for the suspension, the length of time an applicant will be suspended and what they are required to do to reinstate their housing application. Applicants will be advised of this in writing and also of their right to appeal the decision.

Reason for Suspension	Length of Time Application will be Suspended	How the Suspension can end
Current or Previous Housing Debt	The application will remain suspended until the debt has been repaid in full, or a repayment arrangement has been maintained for 3 consecutive months.	Applicants will be reinstated when they confirm to us that the debt has been repaid in full or they have maintained a repayment arrangement for at least three months. If the applicant makes no contact with us to confirm this within 12 months, the application will be closed.

It can be shown that the applicant intentionally provided false information during the application to gain more points	Until accurate information has been provided by the applicant.	The suspension will end when the applicant has provided true and accurate information
Clear evidence of anti-social behaviour associated with the occupancy of property or within the local vicinity	1 year	Review after 12 months where it can be shown whether behaviour has been satisfactory
Conviction or eviction for antisocial behaviour associated with occupancy of property or within the local vicinity	2 years	Review after 24 months where it can be shown whether behaviour has been satisfactory
Acted in an antisocial manner, or pursued a course of conduct which is antisocial conduct, in relation to an employee of the social landlord in the course of making the application.	1 year	Review after 12 months
Where an applicant has abandoned or neglected a tenancy/previous tenancy	1 year	Review after 12 months
Your home including garden or common areas are kept in an unsatisfactory condition	Until property is brought up to an acceptable standard	Review once you can show the property is in a satisfactory condition
Where an applicant has refused 3 reasonable offers of housing	12 months	Applicants will be reinstated after 12 months
If we receive an unsatisfactory reference from your current or former landlord for the past 3 years for anyone on your application.	Up to 6 months	When a satisfactory reference is received or when you can show you can maintain a tenancy in a satisfactory way – whatever is the soonest.

## **2.3 Non-UK Nationals, Asylum Seekers & Refugees**

Non UK Nationals are expected to provide all necessary documentation to show they have a right to reside in the UK before an application for housing is accepted.

An application for housing can be made but it will be suspended until the correct documentation is provided to satisfy legislative requirements.

Migrants have differing rights to social housing according to their immigration status. Whilst we welcome applications from those looking to live, work or study in the UK we will ensure the applicant is not subject to immigration control and has an entitlement to a Scottish Secure Tenancy.

These applicants are required to demonstrate that they have a right to reside and are habitually resident in the UK. Asylum Seekers applying for housing with EHA will have their applications suspended until their refugee status is confirmed by the Home Office.

We will accept applications from refugees directly or via the statutory homeless route (Section 5) and these customers are given reasonable preference on our housing list as defined by the Housing (Scotland) Act 2014.

Management Agreements and leases are in place with accommodation providers to re-house asylum seekers who are nominated by the Home Office any leases for this purpose are provided directly to Mears.

## **2.4 Deferred Applications**

You can ask us to defer your application if you don't want to get an offer of housing for some reason. This means that you can stay on our housing list but won't get an offer of housing. People sometimes ask us to do this if, they are dealing with personal health issues and they feel it would be too upsetting to move at this time. If you ask us to defer your application, it is your responsibility to tell us when you'd like to be considered for an offer of housing. You must still respond to our letters when we review your application if you ask us to defer your application.

# **3 Housing Stock**

## **3.1 Information on Stock**

Information about the types of properties we have and the level of turnover for them is available with the application form or lettings booklet. This information can be used by applicants to get an idea of their likelihood of being offered housing, especially when they take into consideration the streets, or apartment sizes, they have selected.

EHA will provide applicants with details on the likelihood of being made an offer of housing particularly in cases where the applicant has a low number of points or has limited the selection of areas they would accept an offer of rehousing. Additionally, in cases where EHA does not stock that would match the applicants requirements e.g. six bedroom property.

### 3.2 Eligibility of Property Size

We aim to make best use of our housing stock and the size of property an applicant is eligible for will depend on the number and make up of people on the housing application as detailed below:

Household Size	Number of Bedrooms
Single	Bedsit, or 1 double bedroom
Couple/Partners	1 Double Bedroom
Family* with 1 child	2 Bedroom
Family* with 2 children of the same sex under 16	2 Double Bedroom
Family with 2 children of different sex, and at least one aged over 10 years of age	3 Bedroom – 1 x Double and 2 x Single Rooms
Family with 3 children	3 Bedroom – 2 x Double and 1 x Single
Family with 3 children, of different sex, and at least one aged over 16** years of age	3, 4 or 5 bedrooms

\*A family is defined as a couple or a single parent with at least one child

\*\* Children over aged 16 years of age are entitled to a room of their own

### 3.3 Exceptional Circumstances

We will make exceptional circumstances to the above rules dependant on individual circumstances.

Exceptions can be made in the following circumstances:

- If there is a health, care or mobility reason for needing an additional bedroom. For example, for a carer (or team of carers) that provides someone in the household with overnight care or if a long-term condition (such as dementia) makes it difficult for a couple to share a room. This bedroom entitlement would be used to assess any priority based on overcrowding.
- If you provide foster care, or have been pre-approved to provide one additional bedroom, if required
- If someone in the household is adopting a child or has been approved in principle pending suitable housing, they could be listed as looking for a property with an additional bedroom. However, we would not make an offer of a property with an additional bedroom until their application to adopt has been approved by Renfrewshire Council or any other adoption agency. This bedroom entitlement would be used to assess any priority based on overcrowding.
- If you have access to children who do not stay with you on a full-time basis we will provide maximum one additional bedroom regardless of number of children, if required
- If someone in the household is, or wishes to be, a kinship carer for a child or children but those children are not yet living in the household. This bedroom entitlement would be used to assess any priority based on overcrowding.
- If you or a member of your household is pregnant and can provide us with proof of pregnancy e.g. MATB1 Form
- If there is a significant age gap between same sex siblings who are sharing a bedroom
- If older same sex siblings sharing a bedroom alleviates existing severe overcrowding

### **3.4 Adapted Properties and Accessible Properties**

The Association aims to allocate adapted and accessible housing to applicants who are disabled or have limited mobility and are in housing need. Accessible housing is defined as properties that meet the Housing for Varying Needs (HFVN) standard, including new build properties with lifts or existing homes that have been significantly adapted, such as ground-floor properties with accessibility modifications. If you require a specifically adapted house because you have a particular health need or a disability, we may require further information in

support of your application, for example an Occupational Therapist Assessment. When allocating adapted housing, your suitability for the house will be the determining factor so it is important that we fully understand the type of house you need.

### **3.4.1 Wheelchair Adapted Properties**

Wheelchair housing is housing specially designed or adapted to allow a person in a wheelchair to live independently if required.

Applicants for wheelchair housing may be considered for a property that has one bedroom more than would normally be the case under EHA's standard house size rules. We will apply this flexibility where appropriate, for example if an applicant may need a live-in carer at some point in the future, or if an extra room is needed to store a wheelchair and other equipment.

To ensure applicants with accessibility needs are appropriately matched to suitable properties, the Association will create a dedicated accessible/adapted and a wheelchair waiting list within our housing management system. This approach could be reviewed in the future if an alternative method is identified to ensure the most effective way of matching applicants' housing needs to the appropriate housing stock.

### **3.5 Sensitive Lets**

Sensitive allocations, sometimes known as sensitive lettings, are aimed at ensuring that individual allocations do not lead to housing management problems and results in a sustainable tenancy. Instead of automatically allocating a property to the applicant at the top of the list, careful consideration is given to the suitability of the applicant for the vacancy, based on the information they have about the applicant and the knowledge they have about the property, its location or neighbours

A suitable and sustainable allocation is one where there is a good probability of it providing a long term and stable solution for the applicant and surrounding neighbours.

When a property that is available for let is considered to be a sensitive let we will take into consideration the following factors:

- The individual's housing need;
- The suitability of the house for that applicant

- The needs of their prospective neighbours.

All decisions to bypass an applicant on the basis of Sensitive Allocations criteria must be sanctioned by the Housing Manager or, in his/her absence, the Director of Housing and Customer Services and a full record kept of the factors leading to the decision.

### **3.6 Low Demand Properties**

The Association has a number of properties which are regarded as Low Demand. This could be for a number of reasons, examples of which are size (1apt), design and layout or location.

The Association may consider adopting different strategies for letting Low Demand properties such as advertising online e.g. gumtree, social media channels and our website or by contacting and working with external partner agencies who may be able to utilise the property.

All decisions to adopt a different strategy for letting a property must be sanctioned by the Housing Manager or, in his/her absence, the Director of Housing and Customer Services and a full record kept of the factors leading to the decision.

### **3.7 New Build Properties**

A letting plan will be devised for the new build schemes which will take account of the housing needs of internal transfers and include within the overall assessment how we plan to let properties which result from tenants moving into new build housing. This will be presented to Committee for approval.

## **4 Assessment of Need and Award of Points**

### **4.1 Pointing System**

This section outlines how we assess the needs of each applicant and let homes in a fair and consistent way to ensure those in greatest need are housed whilst making the best use of our housing stock. Underpinning our allocation policy, is the applicant's choice to select their preferred areas and house types.

The table below outlines the points that will be awarded to each applicant based on their circumstances:

<b>Housing Need</b>	<b>Definition</b>	<b>Points</b>
Urgent and Exceptional housing need	<p>Extreme and very urgent circumstances requiring supporting evidence from Police Scotland or other recognised agency e.g. Social Work. This includes applicants currently experiencing domestic abuse, hate crimes or other serious harassment. Aspirational needs will not be considered under this category.</p> <p>e.g. demolition/leaving armed forces/hospital discharge/leaving supported accommodation.</p> <p>Such applications will be reviewed every 3 months and note the number of applicants who are awarded these points.</p>	100
Homelessness	Statutory Homeless by the Local Authority including refugees (Section 5's)	50
Insecure Tenant	You can receive points from this group if you do not have secure accommodation or are threatened with homelessness in the next 3 months.	
	<p>you live in private rented accommodation and your lease has expired or you have been served with a notice to quit by your landlord through no fault of your own</p> <p>You own your property and it is at risk of repossession</p>	40
	you live in tied accommodation and your employer has told you that you will have to leave your accommodation within the next 6 months (for example, as a result of retirement or redundancy)	40
Sharing Amenities	Applicants who do not have their own home and lodge in someone else's home-	20



	this includes sons/daughters residing with parents and those living with family or friends;	
Overcrowding	This group is designed to provide points if you are living in accommodation that is not large enough for the people living with you. You will receive points if you need:	
	<ul style="list-style-type: none"> <li>• 1 extra bedrooms</li> </ul>	20
	<ul style="list-style-type: none"> <li>• 2 extra bedrooms</li> </ul>	40
	<ul style="list-style-type: none"> <li>• 3 extra bedrooms</li> </ul>	60
Under occupying	This group is designed to provide points if you are living in accommodation that is not large enough for the people living with you	
	<ul style="list-style-type: none"> <li>• 1 extra bedrooms</li> </ul>	20
	<ul style="list-style-type: none"> <li>• 2 extra bedrooms</li> </ul>	40
	<ul style="list-style-type: none"> <li>• 3 extra bedrooms</li> </ul>	60
Below Tolerable standards	Applicant living in a property that has been assessed as Below Tolerable Standard – Local Authority confirmation is required	30
Harassment, Abuse, Discrimination or Victimisation	Where an individual household is the target of a campaign of harassment, this will generally be supported by evidence from the police, Social Work Services or other support agency and/or the landlord although, particularly in the case of racial harassment.	40
Relationship Breakdown	you are in a relationship that has broken down and you are unable to remain in the home	30
Social Needs	To be near relatives for support <ul style="list-style-type: none"> <li>• Access medical treatment/social services facilities</li> <li>• Employment or education purposes/move closer to work</li> </ul>	15
Medical	Complex Medical	50

	<ul style="list-style-type: none"> <li>• A member of the household has an illness/disability/health condition that is seriously affected by the current housing circumstances and would be alleviated if they moved to a specific house type</li> <li>• Due to an assessed limited mobility a person in the household is unable to access essential parts of the property and it is unsuitable for adaptation (e.g. bathroom upstairs)</li> </ul>	
	Medical Applicants who live in unsuitable housing due to a medical condition/disability but are not housebound and their life is not at risk due to their current housing. Note: Assessment is not made on the basis of health but how the accommodation is impacting on the individual's health.	30

## 4.2 The Quota System

In order to maintain a balance between the various categories of lets, we operate a quota system. Target percentages for the different categories are details below:

Source of Application	Quota
Statutory Homeless Applications (Section 5 Referrals from Glasgow City Council)	58% of lets
General Waiting List	23% of lets
Internal Transfer List	16% of lets
Other (includes Leaving Care Services and Management Transfers/Special Let)	3% of lets

The above quotas will be subject to review on an annual basis.

The percentages outlined in the quotas are not absolute figures which must be attained. Rather, they show how we hope to ensure a balance in our overall annual lettings to each group. An imbalance in quotas towards the end of the year will therefore mean that we should not necessarily make lets to redress the imbalance in order to catch up.

We will ensure selections are made on a rotational basis to help ensure that quotas are broadly achieved on an ongoing basis. To assist this process monthly outcome reports detailing allocations made will be prepared.

## **5 Letting**

### **5.1 Internal Transfers**

Internal transfers occur where a current tenant wishes to move to another one of our properties.

If you are a transfer applicant and your current house is found to be in poor condition, you will be asked to carry out some work to bring it up to the required standard before we are able to offer alternative housing.

You must have a clear rent account. An offer in such circumstances will only be made where the applicant has:

- Made an arrangement to pay the rent owed
- Kept that arrangement for at least three months
- Continues to maintain an arrangement
- Not subject to any anti-social behaviour action

### **5.2 Mutual Exchanges**

Tenants of the Association may apply to mutually exchange with another Elderpark Housing Association tenant or a tenant of another RSL or a local authority. This is where two social housing tenants, from the same or different landlords, exchange homes and tenancies. Tenants can also use the online service provided by Home Swapper to swap properties between different parts of the country. We and any other social landlord involved must agree to the exchange, and we will only refuse permission if it is reasonable to do so. We have a separate mutual exchange policy to deal with such requests. You can get more information about mutual exchanges from our office.

## **5.3 Management Transfer or Special Let**

### **5.3.1 Existing Tenants**

'Management' reasons allows us to assist in urgent re-housing cases where the allocation policy would not otherwise allow us to act quickly enough. It is only used in exceptional circumstances, such as where there is a serious risk if someone remains in their current home or if we wish to re-house one of our tenants as a matter of urgency and could help to alleviate homelessness. In these circumstances we would require supporting evidence from police Scotland or other recognised agencies e.g. social work. Aspirational needs will not be considered under this category.

### **5.3.2 External Applicant**

In the event that EHA is approached by an external organisation such as another Registered Social Landlord, Local Authority or the Police we may decide to allocate a property to an individual(s) in extreme housing need e.g. the individual's property is no longer habitable due to a fire; in cases of domestic abuse; delayed discharge applicants, in these circumstances we would require supporting evidence.

### **5.3.3 No Right to Succession**

Tenancy succession is only applicable to those with a Scottish Secure Tenancy or a Short Scottish Secure Tenancy. You must have informed EHA of the person(s) living at the property as their sole and principal home, and a qualifying period of 12 months or more must have passed. Where an applicant does not have the right to succeed, the Association has no discretion to grant a succession of tenancy. In very rare circumstances, EHA will consider whether it is appropriate, to offer a tenancy to the applicant at that property or any other property, for example in the interest of preventing homelessness. Such a grant of tenancy will not be a succession, but a special let.

Any decision to offer a Management Transfer or Special let will always be approved by the Housing Manager.

## **5.4 Lets to Staff, Committee or Members of their Family**

Management committee members and staff, including people who live with them and close relatives, must declare their interest on our application form.

We will only make an offer of housing to someone who is a committee member or staff, including people who live with them and close relatives, if the application and offer is:

- Checked and approved by two senior members of staff, Housing Manager and Director of Housing and Customer Services
- Authorised by Elderpark Housing Association's Management Committee and recorded in the minutes of the meeting with the details of the let entered into the appropriate Register of Interest.

We ask all applicants to state whether or not to their knowledge, they are related to a committee or staff member of Elderpark Housing Association. We do this to make sure that we comply with the regulatory requirements regarding granting of entitlements, payments, expenses or benefits.

## **5.5 Working with Glasgow City Council**

### **5.5.1 Homelessness**

One of our main policy objectives is to assist Glasgow City Council in meeting the needs of people who have been assessed as homeless. If you believe that you may be at risk of losing your home, you should contact Glasgow City Council's Community Casework team to discuss your housing options. If you are assessed as being statutory homeless, it means that you are homeless through no fault of your own. The Council will make a referral, this is known as a Section 5 referral.

We will decide each year, in our Allocations Quota, what percentage of all our housing allocations will be targeted at this group. The annual percentage target will reflect the legal responsibilities that we have to meet the needs of homeless applicants, as well as our policy objective "to respond to people in acute and urgent housing need".

### **5.5.2 Community Safety - Multi-Agency Public Protection Arrangements (MAPPA)**

The National Accommodation Strategy for Sex Offenders (NASSO) forms part of the Multi-Agency Protection Arrangements (MAPPA) which was introduced as a result of Management of Offenders etc (Scotland) Act 2005. The Association will manage any allocations to sex offenders covered by the MAPPA arrangements at a senior level and in consultation with relevant agencies such as the Police, Scottish Prison Service and Social Work Services. All aspects of this policy may not be applied in making such offer and any offer of housing will be dealt with in line with MAPPA Protocols which covers the Glasgow area. The Head of Housing

is the Association's Link Officer who will work closely with the SOLO (Sexual Offender Liaison Officer) Officer appointed by Glasgow City Council Social Work Services to discuss and agree the housing of any registered sex offenders.

Where the Association is aware that an applicant faces allegations or there is a declaration from the applicant that they are a sex offender we will liaise directly with the SOLO Team and Police Scotland. This approach will be to ensure a risk assessment be carried out prior to any decision to allocate a property to the applicant.

### **5.5.3 Glasgow City Council Health and Social Care Partnership Asylum and Refugee Service**

Leases and Management agreements will be put in place with external agencies who provide support for particular client groups to allow them to provide temporary or permanent supported accommodation as appropriate.

Such lease agreements may result in the applicant being offered a Scottish Secure Tenancy Agreement after a reasonable period of time of occupying the property in order to promote a sustainable community.

### **5.5.4 Glasgow City Council Health and Social Care Leaving Care Services**

The Association has in place a protocol with Leaving Care Services to help protect the quality of the service they offer and also improve access to accommodation for young care leavers. In all cases we will work jointly with appropriate agencies and organisations to ensure that applicants receive appropriate support to sustain their tenancy. We will aim to ensure that applicants are not offered inappropriate tenancies without support which may result in failed tenancies.

## **6 Making an Offer**

### **6.1 Shortlist**

Housing staff will use Rubixx Housing Management System to prepare a 'short list' of applicants when a property becomes available. Joining the waiting list does not mean that we will always be able to make you an offer.

Whether you receive an offer of housing will depend on:

- your housing need
- demand from other people on the list
- the number of properties that become available
- the number of allocations we need to make to applicants in each of the quota groups.

## **6.2 Pre-Allocation Interview**

Prior to any offer being made a pre-tenancy telephone interview will be conducted by the member of staff making the offer. In some circumstances we may carry out a home visit to check your details before an offer of a property is made. The purpose of the telephone interview and/or home visit is to confirm:

- your household details and identity
- your housing circumstances
- the information you provided in your application
- advice and assistance on becoming a tenant of EHA (rent in advance, tenancy sustainment and tenancy conditions)

All offers will be subject to a satisfactory tenancy reference.

## **6.4 Proving your Identity**

Proving your identity you will need to provide us with proof of your identity in the name you have applied in. We will accept your birth certificate, passport or National Insurance card. We also need two forms of proof showing your current address as your permanent and principal home. This may include, but is not limited to:

- Official letters/bills/statements from a local authority, public agency or private utility(gas, electric, telephone), government department, private sector lease, bank or building society
- Current photographic driving licence
- National Health Card

You also need to provide proof of identity of everyone who will be staying with you if you are offered a house from us.

## **6.5 Formal Offer of Housing**

Following completion of pre-allocation check and once your identity has been verified. We will call you to tell you we have an offer for you or will send you a written offer letter or email. If we offer you housing by 'phone' we will always confirm the offer in writing.

The offer letter will contain the following:

- size of property
- rent
- type of heating in property
- date of entry whenever possible
- viewing arrangements
- the association's contact for information

You must tell us within three working days if you are taking the offer. If you don't respond to our offer, we will treat this as a refusal of our offer.

Every offer of a house we make will be a reasonable offer. This means that the house we offer you will:

- have all the bedrooms you need as defined by this policy
- meets the requirements identified in your housing application

Wherever possible, we will offer you the type of housing you'd like but we can't always do this because we don't always have enough of the type of houses people would like to live in.

## **6.6 Accepting our Offer of Housing**

If you accept our offer, we will sign you up as our tenant at your sign-up interview. If you made a joint application, you will have a joint tenancy. All joint tenants must be present when we ask you to sign your tenancy agreement. We will give you advice, information and support throughout the process of becoming our tenant. We will clearly explain your rights and responsibilities under the tenancy agreement before you sign it.

## **6.7 Bypassing Applications**

'Bypassing' is when a landlord does not make an offer of housing to someone who might otherwise have received an offer. We might do this when we know that the property would not meet the applicant's needs or know that the applicant will refuse



the offer. An example of this would be where the applicant has recently refused an offer of a similar property in the same location and has said they would not be interested in receiving a similar offer.

Alternatively, to prevent rehousing a disproportionately high number of statutory homeless applicants beyond the current quota of 58% of lets, we may bypass statutory homeless applicants who are at the top of the general waiting list. This approach aims to avoid a knock-on effect that would result in other statutory groups — such as people living in unsatisfactory housing conditions (e.g., overcrowding, relationship breakdown, harassment, or social/community needs) — receiving disproportionately fewer lets. At present, this group accounts for only 23% of allocations.

We may also use discretion to maximise both current and future tenants enjoyment of their home, and will involve taking account of a number of factors including potential lifestyle clashes in respect of family sizes, ages of children, sound insulation of particular properties and also medical factors pertaining to the applicant.

Whenever we bypass an application, we must record why the application was bypassed. This helps to ensure our policy is transparent, we have acted fairly and are responsible for the decisions we make. Any decision to bypass must be based on need and our policy intention of ensuring the best use is made of the housing stock.

All decisions to bypass an applicant must be authorised by the Housing Manager or, in his/her absence, the Director of Housing and Communities.

## **7 Type of Tenancies**

### **7.1 Scottish Secure Tenancies**

If you are made an offer of housing, we will offer you a Scottish Secure Tenancy (SST) in line with our legal responsibilities. A SST means you can keep your tenancy for as long as you want as long as you do not break the terms of your tenancy agreement. If you do, we can take legal action to end your tenancy.

### **7.2 Short Scottish Secure Tenancies**

In a limited number of situations, we may offer you a Short Scottish Secure Tenancy. As a Short Scottish Secure tenant, you have many of the same rights as a Scottish Secure tenant. However, your rights are more limited on eviction, sub-letting and succession.

### **7.3 Joint Tenancies**

Under this policy you can apply to have a joint tenancy with someone who is staying with you or someone you intend to stay with you. We encourage joint applicants, to apply for joint tenancies to ensure that they have similar legal rights.

## **8 Review of Housing Applications**

Each year, EHA will write to everyone on the housing list, asking them to confirm that:

- They wish to remain on the list; and
- The information we hold about their circumstances and needs is still up to date.

If we do not receive a response to our review letter after 14 days, we will send a second and final letter to the applicant. If we do not receive any response within 14 days of the second letter, we will remove the application from the housing list.

EHA will also remove an applicant from the list, if:

- The applicant asks to be removed (this should usually be done in writing)
- The applicant has died
- The applicant has accepted an offer of a tenancy made by EHA or another landlord.

Housing applicants are responsible for notifying EHA if their household circumstances or needs change, either as part of the annual review or at any time in between annual reviews. This could include changes of address, changes to the household such as new babies being born, or relationship breakdown.

## **9 Policy Development and Performance**

### **9.1 Developing and reviewing this policy**

Consultation and discussion is invaluable in allowing us to achieve a policy and working procedures that will, as far as possible, reflect our tenants and applicants' needs and aspirations. We will consult all applicants and tenants on all reviews of this policy in

accordance with the Housing (Scotland) Act 2001 and our own Tenant Participation Strategy.

In reviewing this version, we consulted with all applicants on our Housing List and tenants who had been recently housed from our Housing List. Insert Details of consultation once completed.

This policy will be reviewed within 3 years from the date of approval by the Management Committee, in accordance with EHA's policy review framework and approval process.

## **9.2 Measuring and monitoring performance**

The Housing Manager is responsible for ensuring that this policy is implemented as required. The Housing Manager will provide reports to the Housing Sub-Committee on a quarterly basis in line with EHA Performance Framework Reporting.

We will undertake regular reviews of our performance and will produce an annual performance report which we will publish on our website. Performance reporting will focus on monitoring our performance against the relevant outcomes and standards in the Scottish Social Housing Charter. Allocations-related information will also form part of our performance reporting to the SHR.

In particular, we will monitor whether our applicants consider that:

- They were treated fairly and with respect, received fair access to housing and housing services
- We communicated well with them

We provided high quality information and advice that helped them make informed choices and decisions about the range of housing options available to them and on their prospects of being made an offer of housing.

# **10 Complaints and Appeals**

## **10.1 Complaints**

We aim to provide a high-quality housing allocation, advice and information service to applicants. However, we accept that from time to time we will not always get it right and welcome feedback from our customers. The Association has a complaints procedure and this is available on-line or in leaflet format. Staff can assist applicants to make formal complaints if required. An applicant can use the Complaints Procedure to address the following:

- Delays in responding to enquiries and requests
- Failure to provide a service
- Our standard of service
- The Allocation Policy
- Attitude or behaviour of a member of staff

## **10.2 Appeals**

Separate from the Complaints Procedure, there is an appeals process within the Allocation Policy to deal with instances where an applicant is unhappy about a decision made about their application. An applicant can appeal if they think that:

- The priority they have been awarded does not reflect their needs
- They have been unfairly suspended from the housing register or their application has been cancelled unreasonably
- Their priority has been removed unreasonably because they have refused offers of housing
- The house they have been offered does not match the choice on their application
- They have been offered a house that is in an unacceptable condition
- We have refused to make an offer of housing

The timescale for submitting an appeal is up to 21 days from the date of the decision being made. An appeal will be investigated by the Housing Manager, who will respond to the applicant within 10 working days of receiving the appeal. If the applicant remains dissatisfied with the response the applicant may request that the case is considered by the Director of Housing. This is the final stage of the Appeals process. Where the grounds for appeal are related to the condition of the house and it is not possible to resolve the matter successfully at the initial stage, the house will be offered to the next eligible applicant.

## GDPR Impact Assessment

<b>Name of Policy to be assessed</b>	Allocation Policy	<b>New policy or revision of existing?</b>	Revision of existing policy
<b>Person(s) responsible for assessment</b>		Rachel Cooper	
<b>Briefly describe the aims, objectives and purpose of the policy.</b>	<p>The objectives of the Allocation Policy are as follows:</p> <ul style="list-style-type: none"> <li>• To let our houses in an open and fair manner to people with diverse housing needs.</li> <li>• To provide open access to our housing list and enable people to exercise choice about where they want to live.</li> <li>• To help make EHA neighbourhoods vibrant and sustainable places for our tenants to live.</li> <li>• To give high priority to addressing homelessness.</li> <li>• To make the most effective use of available housing stock, and manage the turnover of lettable properties in an efficient manner.</li> <li>• To comply with all statutory and regulatory requirements relating to housing applications and allocations.</li> </ul>		
<b>Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)</b>	Personal and potentially sensitive information will be used by implantation of this policy.		
<b>What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)</b>	<p>The Allocations Policy provides guidance to applicants, tenants and staff on how Elderpark Housing Association allocated its properties. The main legal requirements relating to housing applications and lettings are set out in the Housing (Scotland) Act 1987, as amended by the Housing (Scotland) Act 2001 and the Housing (Scotland) Act 2014. In addition, the Scottish Government has published statutory guidance that applies to housing allocations</p>		
<b>Which groups could be affected by the policy? (note all that apply)</b>			
<b>Tenants</b>	X	<b>Committee</b>	X
<b>Employees</b>	X	<b>Contractors</b>	
<b>If the policy is not relevant to any of the data groups listed above, state why and end the process here.</b>			

<b>Have those affected by the policy / decision been involved?</b>		
Yes all tenants and applicants have been consulted on the proposed changes to the allocation process.		
<b>Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b>	<b>Positive Impact(s)</b>	<b>Negative Impact(s)</b>
	Provides greater transparency on the way in which we allocate properties	None
<b>What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b>	The Association has systems and checks in place to ensure that personal data remains confidential. Information will be shared with work colleagues on a strictly 'need to know' basis.	
<b>Signed:</b>	Rachel Cooper	
<b>Dated:</b>	07.02.2024	

## Equality Impact Assessment

<b>Name of Policy to be assessed</b>	Allocation Policy	<b>New policy or revision of existing?</b>	Revision of Policy
<b>Person(s) responsible for assessment</b>		Rachel Cooper	
<b>1. Briefly describe the aims, objectives and purpose of the policy.</b>	<p>The Allocations Policy provides guidance to applicants, tenants and staff on how Elderpark Housing Association allocated its properties.</p> <p>The objectives of the Allocation Policy are as follows:</p> <ul style="list-style-type: none"> <li>• To let our houses in an open and fair manner to people with diverse housing needs.</li> <li>• To provide open access to our housing list and enable people to exercise choice about where they want to live.</li> <li>• To help make EHA neighbourhoods vibrant and sustainable places for our tenants to live.</li> <li>• To give high priority to addressing homelessness.</li> <li>• To make the most effective use of available housing stock, and manage the turnover of lettable properties in an efficient manner.</li> <li>• To comply with all statutory and regulatory requirements relating to housing applications and allocations.</li> </ul>		
<b>2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)</b>	Applicants/Tenants		
<b>3. What outcomes are wanted from this policy? (e.g. the measurable changes or benefits to members/ tenants / staff)</b>	<p>The Allocations Policy provides guidance to applicants, tenants and staff on how Elderpark Housing Association allocated its properties.</p> <p>The main legal requirements relating to housing applications and lettings are set out in the Housing (Scotland) Act 1987, as amended by the Housing (Scotland) Act 2001 and the Housing (Scotland) Act 2014. In addition, the Scottish Government has published statutory guidance that applies to housing allocations</p>		
<b>4. Which groups could be affected by the policy? (note all that apply)</b>			
<b>Age</b>	x	<b>Disability</b>	x
<b>Gender reassignment</b>	x	<b>Marriage and Civil Partnership</b>	x
<b>Pregnancy and Maternity</b>	x	<b>Race</b>	x
<b>Religion or Belief</b>	x	<b>Sex</b>	x
<b>Sexual Orientation</b>	x		

<b>5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.</b>		
<b>6. Have those affected by the policy / decision been involved?</b>		
All applicants and tenants have consulted on the proposed changes of the allocation policy.		
<b>7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b>	<b>Positive Impact(s)</b>	<b>Negative Impact(s)</b>
	Provides greater transparency on the way in which we allocate properties	None
<b>8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b>	The Association has systems and checks in place to ensure that personal data remains confidential. Information will be shared with work colleagues on a strictly 'need to know' basis.	

<b>Signed:</b>	<i>Rachel Cooper</i>
<b>Dated:</b>	08.02.2024