



Allocations Policy

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Policy Owner	Director of Housing and Communities
Policy Author	Policy Business Partner
Approved by	Board 8th June 2023
Equality Assessment	Equality analysis carried out September 2021 and May 2023
Next review and risk assessment scheduled	March 2025
Distribution	Internal: All Home Group colleagues, communicated via Home World intranet, Workplace and Leadership Portal External: Summary on Home Group website. Full policy available on request to Home Group policy team
Key search terms	Allocation; nomination; section 5 referral; internal transfer; management transfer; garages; homelessness; banding; offers
<ul style="list-style-type: none"> • For the full version history of this policy, click HERE (see back page) • Please avoid referring to printed versions of this policy or saving it on shared/ individual drives. All policies and supporting resources can be found under 'Policy and Procedures' on the intranet. Printed and saved versions may quickly go out of date- contact policy@homegroup.org.uk for support and advice 	

1.0 Allocations policy statement

We are one of the UK's largest providers of high-quality homes and integrated housing, health and social care, as well as a social enterprise and charity.

Here at Home Group we really want to make a difference to people's lives and are committed to providing homes which our customers can enjoy living in across England and Scotland. We understand the value having a suitable home can bring and the impact this can have on a person's health, wellbeing, and happiness.

Creating diverse communities, helping to meet our customer's needs and aspirations so that they get best possible experience and outcome with us, at the same time as being a top performer in the sector, is really important to us.

We are an ambitious organisation and apply innovation and creativity wherever we can. This includes making the best use of digital technology where it's appropriate to do so, whilst ensuring we meet our legislative, contractual, and regulatory obligations.

Everyone who applies for a home with us is treated fairly, consistently and with respect. We work efficiently and closely with our partners including local authorities, social housing providers, support providers and other agencies to fulfil our responsibilities and help those who require our services.

Our customer promise is a set of commitments we are held accountable for and this policy helps support key elements of it. Our customer promise is to:

- Provide a safe place to live
- Deliver a reliable repairs service
- Care about you
- Help communities grow
- Tell you where your money goes
- Work together with customers and partners

This policy relates to our Corporate Strategy and Operational Delivery Plan and sets robust standards of practice in relation to the allocation of our rented properties and garages.

2.0 Policy scope

This policy sets out Home Group's approach to the allocation of housing in our rented properties (including internal and management transfers) and garages. It applies in England and Scotland and is for use by colleagues.

It does not include referrals and allocation of our supported properties, mutual exchanges, older persons, mid-market rent or housing partnerships.

Allocations will be made in line with Home Group's charitable objectives and all relevant regulation and legislation, including but not limited to:

Regulatory Standards for Social Housing England; Scottish Social Housing Charter; Data Protection Act 2018; Allocation of accommodation: guidance for local authorities; Right to Rent Home Office Guidance for Landlords; The Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006; Housing Act 1996 (as amended by the Homelessness Act 2002); The Housing (Scotland) Act 1987 (as amended by the Housing (Scotland) Act 2001); Housing (Scotland) Act 2014; Immigration Act 2020; Localism Act 2011; Welfare Reform Act 2012; Limitation Act 1980; Prescription and Limitation (Scotland) Act 1973 and Equality Act 2010.

This policy reflects examples of good practice and our commitment to diversity and inclusion throughout the organisation. It should be used alongside any other relevant arrangements in place with local authorities or other providers, as well as the associated supporting resources. It also closely links to many of our other policies including our Tenure policy, Support Practice policy, Property Management policy, Tackling Anti-Social Behaviour policy, Arrears Management policy, Equality, Diversity, Inclusion and Belonging policy and Complaints, Compliments and Comments policy.

Any conflicts of interest in relation to allocating properties are dealt with under our Managing Conflicts of Interest policy (Gifts and Hospitality and Payments and Benefits).

With executive approval, we reserve the right to act outside this policy in exceptional circumstances.

3.0 Standards

Standard 1: Applying for housing

We make information accessible about the type of allocation schemes in place and provide clear and relevant advice about the housing options available to applicants according to their circumstances.

Where appropriate we direct applicants to local authorities, other housing providers, and support services where this may be of benefit. We provide assistance with completion of the application where this is required, and we make every effort to communicate to our customers in formats and languages they prefer to ensure access is not impaired.

Applications for housing are acknowledged within set timescales and sometimes need to be supported by additional information, for example a doctor's letter confirming a medical condition.

We are committed to protecting the human rights of everyone who receives a service from us and decisions on allocations are made in line with our Equality, Diversity, Inclusion and Belonging policy.

Standard 2: Assessment and award of priority

Applications for housing are assessed in line with the law, local authorities and to fulfil any other requirements including contractual arrangements where appropriate. This policy does not affect or refute any nomination agreements or letting arrangements entered into with local authorities in the areas in which we operate.

For homes we let using our own policy, we assess applications to determine the applicant is at least 18 years old in England. We do not accept direct applications from applicants aged 16 and 17 years old, instead we direct them to the Local Authority to present as a 'child in need' for assessment and protection under Section 17 of The Childrens Act 1989.

In Scotland we accept applications for housing from applicants aged 16 years old. Our Tenure policy provides further information on the types of tenancies we offer. In England, applicants must also have the right to rent in accordance with the appropriate legislation and any relevant guidance issued by the Home Office.

We take account of current housing need and circumstances as well as any anticipated housing needs or changes in circumstances. At Home Group we use a banding system to determine housing need and priority.

The criteria in which we would consider applicants ineligible in England is also taken into account at this time. In Scotland, we consider our suspensions criteria. Further details can be found in the 'key definitions section' of this policy.

Existing customers who request an internal transfer are handled in the same way as other applications for housing.

We assess applicants who own property in line with this policy standard and on a case by case basis, to determine their housing need. Applicants are unlikely to be considered a priority for housing unless their property is unsafe for them to occupy (i.e. a threat of abuse

or it's structurally unsafe), they are in extreme financial difficulty (i.e. mortgage repossession) or their property does not meet their needs (i.e. they have a medical need or disability and their needs cannot be met from that property). As legislation differs in Scotland, eligible applicants considered to have no priority will be added to the waiting list. We do not operate a general waiting list in England however, applicants will be advised of alternative housing options where appropriate. We make it clear to applicants that being included on our waiting list does not mean they will be offered a property.

Standard 3: Fairness and transparency

We apply our Allocations policy fairly and consistently. We are open about how we assess applications, how we prioritise and select new applicants and existing customers, and our approach to the allocation of housing. These conditions are dependent on a number of contributing factors including, using our own waiting lists where these are in operation, as well as local authority nomination agreements and choice-based lettings arrangements, where these are in place. The decisions we make are supported by our policies and associated resources.

Colleagues maintain the highest standards of behaviour and integrity in their roles. Our working practices ensure that any conflicts of interest (e.g. an applicant being related to a Home Group colleague) are declared and appropriately handled, so that nobody benefits improperly from their position. We consult with relevant stakeholders before making any significant changes to this policy.

Standard 4: Allocating properties

Properties are allocated in line with our policy and supporting resources and depending on the type of allocation arrangements in place locally. Wherever possible we aim to allocate properties to direct applicants but recognise that restrictions or other factors may also apply. This includes age related restrictions and factors required to meet local needs such as local lettings plans, choice-based lettings schemes, common housing registers and agreements for nominations with local authorities.

Our properties are usually allocated to those who are eligible, with the highest priority banding and the earliest application date. Priority for nominations, choice-based lettings schemes, and common housing registers will be based on local agreements in place. Relevant law in England and Scotland requires that reasonable preference must be given to applicants who fall within one of the reasonable preference categories. We also give priority to additional groups to reflect local circumstances and organisational priorities (i.e. in England we award the highest priority to customers in our supported housing who fall within our priority banding, have successfully completed their journey of support, and are ready to move into independent housing). We also award priority to other eligible applicants such as armed forces veterans with impending discharge and victims of domestic abuse who need to move urgently. We offer the best level of tenure we can, in accordance with our Tenure policy.

We assess cases on their merits to ensure our homes are allocated appropriately and fairly.

In England, we reserve the right to close internal waiting lists in some areas and restrict the number of registered applications, e.g. where the demand for homes exceeds the supply

available in that area and realistically there is no prospect of us being able to help at that time. We inform applicants where this is the case.

All allocations follow our room requirements criteria which sets out the size of properties we offer. We can however deviate from these requirements where there is a clear business need to do so.

Prior to any offer of accommodation being confirmed, we will carry out an affordability check to confirm the applicant can afford and sustain that tenancy.

Direct applicants may be considered ineligible in England where we have made a number of reasonable offers which have been refused. In Scotland, applicants may be suspended.

Offers may also be withdrawn for a number of reasons including applicants' failing to respond within set timescales; not informing us about changes in circumstances or intentionally worsening their situation affecting their application or priority for housing; or supplying us with incorrect, incomplete, or misleading information which could be considered fraudulent.

Standard 5: Management transfers

Sometimes we need to use management transfers to move existing customers to alternative accommodation, where their life is at immediate risk and/or they cannot enter their home for medical or other reasons (i.e. safeguarding concerns). Such cases will normally fall within our highest priority banding but will usually be dealt with on an emergency basis, recognising they may need to take priority over other applicants in the same band.

Standard 6: Allocating garages

We maintain waiting lists for the allocation of vacant garages. Offers are made to applicants in date order and current Home Group customers are given priority.

Standard 7: Working in partnership

We work closely with local authorities and other partner agencies to help meet local needs, address homelessness, and create sustainable communities.

This includes supporting local authorities with their homelessness duties and meeting obligations in nomination agreements and Section 5 Referrals (Scotland). Where appropriate we may review or renegotiate nomination agreements where there is a business need to do so, and in recognition of our need to provide housing for our own applicants. Reasons for rejecting nominations are usually specified in nomination agreements and rejections in relation to Section 5 Referrals in Scotland are set out in housing legislation and guidance from the Scottish government.

Standard 8: Meeting housing, business and other requirements

There may be occasions where we make decisions to meet housing, business or other extreme or unique requirements. For example, we may designate some of our properties for use as supported accommodation.

Wherever possible we make the best use of our assets, ensuring that properties designed to meet particular needs are allocated appropriately, e.g. our adapted properties.

Standard 9: Recording and monitoring

We follow our policies and supporting resources when properties become available to let. This helps ensure compliance and minimise the time that properties are empty between each letting.

We record all social housing lettings as required by the Continuous Recording of Lettings (CORE) system in England.

In Scotland, we complete the Annual Return on the Charter (ARC) and also publish information against our quota targets for each priority band.

Standard 10: Learning and continuous improvement

We continuously look for ways to improve and customer feedback and insight are really important to us. They allow us address issues, understand behaviour, identify gaps, and make changes to how we work, so that our customers get the best possible experience and outcome with us.

From time to time we may introduce pilot projects to help simplify our processes and test new ways of working before they are implemented. When this happens, we ensure these initiatives are communicated effectively and the appropriate permission is sought.

Standard 11: Appeals and complaints

Applicants cannot appeal against the policy itself, but if they feel that their application has not been dealt with in accordance with this policy, or that any representative of Home Group has treated them unfairly or unreasonably they may appeal. All appeals will be dealt with by a manager.

If the applicant still remains dissatisfied after the appeal, they are advised of our Complaints, Compliments and Comments policy and process.

Standard 12: Value for money

We closely monitor demand and ensure that our allocations are made as quickly as possible. Maximising the use of available homes and keeping our empty properties to a minimum, not only helps ensure a quick turn round is achieved for our customers, but also helps reduce our costs contributing to value for money.

Wherever we can we continue to make the best use of resources and the latest innovative technology to support our allocations activity.

4.0 Key definitions

Word / phrase	Definition
Applicant	The person who is applying for housing, we will accept applications from joint applicants.

ARC (Scotland only)	In Scotland we complete the Annual Return on the Charter (ARC) which outlines how we have performed in the previous year against standards set out by the Scottish Housing Regulator.
Banding	<p>Home Group uses a banding system to assess priority based on housing need and organisational priorities.</p> <p>Applications are held in date order and if an applicant's housing need changes, they can be reassessed and move into another band. The applicant holds their original date of application.</p> <p>Cases are assessed on their merits and decision are made at our discretion. As evidenced, the legislation differs in England and Scotland and the banding system varies to reflect this.</p>
CORE (England only)	CORE (Continuous Recording of Lettings) is a national information source funded by the Department for Communities and Local Government that records information on characteristics of both private registered and local authority new social tenants and the homes they rent and buy. The information allows policy makers and practitioners to monitor housing costs and assess affordability.
Customer	Home Group refers to tenants as customers.
Homelessness	The legal definition of homelessness differs in England and Scotland, as do our responsibilities to meet the needs of homeless people.
Ineligible applicants (England)	<p>We assess each application for housing we receive carefully (see policy standard 2 for further information). We will only make applicants ineligible where we consider it reasonable to do so and then only after considering the individual circumstances of the case. This includes information on applicants who own property.</p> <p>There are certain circumstances where we may consider applicants ineligible for housing with us, including where:</p> <ul style="list-style-type: none"> • The applicant(s) do not meet the assessment criteria (outlined in policy standard 2). • The applicant(s) have been evicted for a breach of tenancy by another landlord. • We consider the applicant(s) to be a potential threat to the local community because they have been convicted of offences such as (but not limited to) drug dealing, violent or abusive behaviour towards others, racially motivated attacks / hate crimes. • Home Group or another landlord has commenced legal action against the applicant(s) for breach of tenancy within the past 3 years. • There is evidence that the applicant(s) has been violent, made threats of violence, or been guilty of harassment or intimidation towards a Home Group colleague, contractor or other social landlord in the past 5 years. • A Notice has been served on the applicant(s) due to a breach of tenancy • The applicant(s) have not provided us with evidence to confirm they have the means to pay the rent (including eligible service charges) at the point of letting. • The applicant(s) have support needs which we are unable to meet. • The applicant(s) have previous or current debt with Home Group or another landlord (including housing related debt consisting of rent arrears, service charge, rechargeable repairs and legal costs) unless there is a repayment agreement in place which is being complied with and which we consider reasonable, based on the value of the debt and

	<p>the repayment period. We do not take into account debt which is legally non recoverable.</p> <ul style="list-style-type: none"> • The applicant(s) have previously abandoned a property. • The applicant(s) have given false or misleading information on the application form. • The applicant(s) have refused reasonable offers of accommodation. • The applicant(s) are not entitled to hold a tenancy due to their immigration status. <p>This list is not exhaustive.</p> <p>Applicant(s) considered ineligible will be informed of our decision and will be advised they can reapply when:</p> <ul style="list-style-type: none"> • A certain period has elapsed or • Their conduct has changed or • A change in circumstances has occurred.
Nomination Agreement	<p>Historically local authorities have often ‘nominated’ tenants from their own lists to an agreed percentage of a housing association’s annual vacancies. Nomination agreements are not based on statute, so partners are free to agree the terms of the agreements. It is good practice to make sure that any such agreements have clear aims and are based on a robust analysis of need and demand; they must contain a date for review and reviews should be conducted jointly by the LA and HG representatives. The nomination agreements should include clear guidelines for accepting, excluding, or rejecting nominations and for resolving disputes about individual cases. Home Group has entered into a range of agreements with local authority partners in line with local needs. In some areas 100% of properties may be allocated through nomination agreements.</p>
Offers	<p>Where we have made a number of reasonable offers to an applicant and they have been refused, we may consider them ineligible for housing in England. In Scotland applicants may be suspended.. We consider 3 a reasonable amount.</p>
Property ownership	<p>Property ownership includes land, as well as anything built on land in the UK or abroad, or a property part owned under a Shared Ownership Scheme.</p>
Rented properties	<p>These are our general needs properties.</p>
Room requirements criteria	<p>Room requirements criteria is the criteria we use for determining the size of the property to offer to eligible applicants.</p>
Section 5 Referral (Scotland)	<p>Section 5 of the 2001 Act gave registered providers the duty to house statutory homeless people. Registered providers must meet section 5 requests from local authorities unless there are good reasons not to.</p>
Suspension Scotland	<p>We assess each application for housing we receive carefully (see policy standard 2 for further information). This includes information on applicants who own property.</p> <p>A suspension is when someone who has been accepted onto our housing list is told they will not be eligible for an allocation or an offer of housing until:</p> <ul style="list-style-type: none"> • A certain period has elapsed or • Their conduct has changed or • A change in circumstances has occurred <p>We will only suspend an application where we consider it reasonable to do so and then only after considering the individual circumstances of the case. Any decision to suspend an application will be:</p> <ul style="list-style-type: none"> • Based on consideration and evaluation of robust evidence • Subjected to a test of reasonableness

	<ul style="list-style-type: none"> Reviewed on an individual basis <p>When considering suspensions, we look back up to 3 years unless there are exceptional circumstances.</p> <p>Suspensions will not exceed 3 years and will be based on the seriousness of the offence. We may remove, shorten or withdraw a suspension in certain circumstances where we feel it is appropriate to do so. We will explain to applicants the reasons for our decision.</p> <p>Circumstances in which we may consider suspending applicants include:</p> <ul style="list-style-type: none"> The applicant(s) has acted in an anti-social manner. The applicant(s), or someone the applicant(s) lives with or has lived with, has been convicted of certain offences and where those offences are associated with a residential property or the surrounding area. Examples of offences are (but not limited to) drug dealing, violent or abusive behaviour towards others, racially motivated attacks / hate crimes. Where a court has previously granted an order to evict the applicant(s). The applicant(s) has abandoned or neglected a tenancy. The applicant(s) has outstanding tenancy-related debt where the amount is over one month's rent charge. We do not take into account situations where an arrangement has been put in place for clearing the arrears and the applicant has kept to the arrangement for at least 3 months and is continuing to make payments. We do not consider debt which is legally non recoverable. The applicant(s) knowingly makes a false statement on a housing application form. The applicant(s) has refused 3 reasonable offers of housing. There is evidence of violence or threats of violence, or, been guilty of harassment or intimidation towards a Home Group colleague, contractor or other social landlord. <p>This list is not exhaustive.</p>
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5.0 Supporting documents

In order to comply with Home Group's approach to **allocations**, and achieve the standards set out above, the relevant processes and policy compliance notes must be followed in line with stated roles and responsibilities. Colleagues should refer to our internal index for the full list of supporting documents.

6.0 Version history

Version Number	Effective Date	Amendment made by	Version approved by	Description of Changes
1.0	July 2017	Policy Business Partner	Board	<p>New Policy combining, incorporating and replacing pre-existing policies</p> <ul style="list-style-type: none"> HG_CS_HSG_120 Allocations HG_CAS_HSG_70 Referrals and Allocations <p>Changes to previous approach set out in pre-existing policies include</p>

				<ul style="list-style-type: none"> • Introduction of restriction on number of direct offers to applicants for housing before affecting priority level and further restrictions on eligibility for home owners • Consideration to be given to affordability in allocations decisions • Standard added on allocation of garages <p>Increased priority to Home Group supported customers who have completed their support pathway band ready to move on to independent housing.</p>
1.1	July 2017	Policy Business Partner	Assistant Director of Operations	Removed reference to the Scottish Continuous Recording System in Scotland as this no longer operates.
1.2	February 2018	Policy Business Partner	N/A	Re-branded
1.3	N/A	Policy Business Partner	Director of Service Delivery (south)	Desk top review and risk assessment completed June 2020. Risk assessment and review date changed to April 2021.
1.4	25.2.21	Policy Business Partner	Director of Housing and Communities	Desk top review completed, and risk assessment approved 21.1.21.
1.5	2.2.22	Policy Business Partner	Director of Housing and Communities	Policy risk assessment completed and approved 2.2.22
2.0	30.3.22	Policy Business Partner	Board	Policy re-written and tone changed to reflect how a change in accommodation can impact on a person's health and wellbeing, maximising the use of digital technology and collaboration. Scope of policy narrowed to the allocation of our rented properties and garages, additional policy standards created on management transfers and learning and continuous improvement. Our approach to property ownership has been included for Scotland (Housing Scotland Act 2014) and both England and Scotland will now use consistent criteria. Linked assessing applications and the criteria which would make applicants ineligible in England or suspended in Scotland together. Rejections and exclusions in England removed from key definitions section and replaced with ineligible applicants. Terminology relating to 'support pathway' changed to 'journey of support'. Information added in relation to offering the best form of tenure we can to victims of domestic abuse. Amended our Appeals policy standard to make it clear that applicants cannot appeal against the policy.
2.1	31.3.23	Policy Business Partner	Director of Housing and Communities	Desk top review completed, and risk assessment approved 22.3.23.
2.2	14.7.23	Policy Business Partner	Board	Amendment made to standard 2 to regarding applicants aged 16 and 17 years old and that they will be directed to Local Authority. Direct applications will not be accepted.

	14.7.23	Policy Business Partner	Director of Housing and Communities	<p>Standard 4 amended to state that age related restrictions also apply.</p> <p>Reduced priority aspect removed from standard 4 and key definitions (offers) section where a number of reasonable offers have been made to applicants and have been refused.</p> <p>Managing Conflicts of Interest policy (Gifts and Hospitality and Payments and Benefits) added to policy scope.</p>
2.3	8.3.24	Policy Business Partner	Director of Housing and Communities	Desk top review completed, and risk assessment approved 23.2.24. Policy name change made to section 2 and policy standard 1 (Equality, Diversity, Inclusion and Belonging Policy)