

Allocations Policy



Originator:	Policy and Strategy Team
Executive Management Team Approval Date:	November 2020
Review date:	November 2021

1	Introduction
1.1	One Vision Housing's (OVH) recognises the need to allocate its vacant properties that are available for rent in a fair, consistent and transparent manner that meets housing need and makes the best use of available resources.
1.2	OVH is a Scheme Administrator of the sub-regional Choice Based Lettings (CBL) allocations scheme, Property Pool Plus (PPP). Along with other participating landlords, this scheme aims to provide accessible routes to social housing prioritised on the greatest housing need and in date order, within the 'reasonable preference categories' as defined by the Housing Act 1985, Housing Act 1996, Homelessness Act 2002 and Localism Act 2011.
1.3	In accordance with the terms of the transfer agreement with Sefton Metropolitan Borough Council up to 75% of allocations are made via PPP, within the borough of Sefton.
1.4	Where OVH has stock in other local authority areas within the scheme 50% of allocations will be made through PPP and in line with any Section 106 agreements (mechanism used to make a development acceptable in planning terms). Where OVH has properties in areas with alternative choice based lettings schemes e.g. Cheshire Homechoice, the level of nominations will be determined by agreement.
1.5	In conjunction with other participating PPP landlords and local authorities, a detailed Policy document has been developed and is maintained outlining the provisions of the PPP scheme and is available at www.propertypoolplus.org.uk .
1.6	<p>This Policy outlines the methods OVH will operate for allocating social or affordable rented properties outside of the CBL scheme or within it when additional acceptance and bidding criteria may apply. The Policy does not cover the provisions OVH has in place for the allocation, or management of:</p> <ul style="list-style-type: none">• Market rented properties• Shared ownership or rent to buy• Properties for sale• Mutual exchanges• Successions• Tenancy assignments• Transfer of tenancies

1.7 The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England, responsibility of the Regulator for Social Housing (RSH) as outlined below:

- Registered providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants. They shall demonstrate how their lettings:
 - (a) make the best use of available housing
 - (b) are compatible with the purpose of the housing
 - (c) contribute to local authorities' strategic housing function and sustainable communities
- There should be clear application, decision-making and appeals processes

1.8 **Access and Communication**

1.8.1 OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.

1.9 **Equality, Diversity and Human Rights**

1.9.1 OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out its duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation and Religion and/or Belief, Marriage and Civil partnership, Pregnancy and Maternity.

1.9.2 OVH also recognise that some people experience disadvantage due to their socio economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.

1.9.3 OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will endeavour to ensure its staff and others with whom it works will adhere to the central principles of the Human Rights Act (1998).

1.10 This Policy should also be read in conjunction with the:

- OVH Demand Incentive Policy
- OVH Tenancy Transfer, Succession and Mutual Exchange Policy
- OVH Local Lettings Policy
- OVH Complaints, Appeals and Feedback Policy
- PPP Allocations Policy

2**Statement of Intent**

- 2.1 OVH aims to provide the highest standards of probity and accountability in all business dealings including the allocation of its properties that are available for social and affordable rent. To ensure all decisions in allocations are justifiable and consistent, OVH will make this and all other Policies that impact on allocations, publically available via its website.
- 2.2 OVH will regularly monitor the effectiveness of this Policy and other measures it puts in place to assist in the allocation of vacant properties, including marketing methods and additional allocations criteria. The Executive Management Team will periodically receive collated performance reports on all lettings, void turnaround times and any complaints or appeals received.
- 2.3 OVH will ensure that all provisions in regard to property allocations meet all legal and regulatory standards, which may change from time to time.
- 2.4 In operating this Policy OVH seeks to maximise rental revenue, to maintain financial viability and continue to provide excellent service levels for all existing and future customers.
- 2.5 OVH will operate allocations Policies that are responsive to changes in market conditions for example the current drop in demand for larger family sized units from those in receipt of welfare benefits and will adopt measures to ensure all vacant properties are let expediently and rental revenue is protected. This may include under-occupying or giving preference to those with the financial means to pay full rent.
- 2.6 Where applicants for housing have outstanding arrears or debts owing to OVH / other landlords, they may be excluded from applying for housing or be given 'Reduced Priority Status'. The level of arrears that would lead to this status will be determined by the choice based lettings scheme and OVH would need to see debts reduced to a satisfactory level and/or repayment plans being adhered to before offers of accommodation are made.
- 2.7 On a case by case basis and on a risk-based approach OVH, may allocate properties to customers with arrears where there are extenuating circumstances, an illustrative example being when customers are fleeing domestic abuse. In these circumstances all decisions will be authorised by two Service Managers.
- 2.8 Where OVH accepts applicants for housing that have former rent arrears (either owing to OVH or other social landlord) it will endeavour to put in place arrangements to pay outstanding debt and will assist, where appropriate, in accessing Discretionary Housing Payments.
- 2.9 In operating this Policy, OVH will not allocate properties to any person(s) that would otherwise be excluded from offers of housing under Choice Based Lettings schemes (or equivalent), that it is party to, unless under agreement with local authority, other providers or statutory agencies e.g. Community Rehabilitation Companies.
- 2.10 In operating this Policy and through the provisions in the PPP Policy or any other choice based lettings scheme, OVH seeks to create balanced and sustainable communities.

3

Policy

- 3.1 For the majority of either social rented or affordable rent properties (80% of local market rent) OVH will continue to use the traditional method of allocations from CBL schemes under nomination rights (where these are in operation) and according to the conditions outlined in any Section 106 agreements (including for new build properties where local authorities retain nomination rights for first / subsequent lets).
- 3.2 This involves properties being advertised on the CBL websites with those accepted on the housing register having to submit bids which are prioritised against the 'reasonable preference' and date order categories.
- 3.3 OVH reserves the right to reject nominations made by local authorities or where applicants have been accepted as being eligible for housing on CBL schemes, on an individual and case-by-case basis.
- 3.3.1 This would only normally occur when OVH believes the applicant(s) would be unsuitable for rehousing for legitimate reasons, non-exhaustive examples of which include:
- Unsuitable behaviour whilst in a previous OVH or other social landlord tenancy that has warranted legal action (injunctions or possession proceedings)
 - Unsuitable behaviour directed towards OVH customers, staff or staff working on its behalf
 - (in the above examples no evidence is provided by the applicant(s) to demonstrate a positive change in behaviour)
- 3.3.2 Where OVH rejects a nomination or person accepted for rehousing within a CBL scheme (or similar) it will inform both the applicant(s) and the relevant local authorities at the earliest opportunity and in writing, outlining the reasons for the refusal to make offers of accommodation. Advice will also be provided to the applicant on alternative housing options.
- 3.3.3 OVH will keep all relevant local authorities it works with informed of reasons why it may refuse to accept nominations and will enter into negotiation with them where any disputes or disagreements may arise. It will also abide by any determinations made by independent and expert arbitrators where the two parties fail to reach agreement.
- 3.4 Where OVH is not bound by the terms of the above schemes (3.1 to 3.3) i.e. outside of nomination rights or where no conditions are stipulated in Section 106 agreements, it reserves the right to allocate its properties by other means. This may involve:
- **Direct lets –**
 - Where OVH contact suitable applicants on the housing register and invite them to view available or suitable properties, without them having to submit bids or;
 - Via direct lettings where applicants and potential customers are not required to have completed a housing application form (CBL form) and simply apply in response to adverts placed (and will be allocated properties subject to satisfactory verification checks)
 - Via the partnership established with Community Rehabilitation Companies for the housing of low risk ex-offenders with tailored individual support or any other Service Level Agreement that OVH develops with partners

- Via the partnership with Liverpool and Sefton Veterans for OVH to provide specialised accommodation to local veterans
- Via partnership with Housing First Project which offers accommodation to individuals and families who are homeless with support

3.5 OVH may allocate properties directly to applicants outside the Choice Based Lettings Schemes. Non exhaustive examples of direct lets include:

- Where an allocation is required to ensure protection of the public for example following a decision made by a Multi-Agency Public Protection Arrangements meeting
- Where a customer has been referred as part of the Witness Protection Scheme
- Where a sensitive let is required for a particular property because of issues such as drug dealing, violence, public protection or anti-social behaviour
- Where a Scheme Landlord tenant's home is being repaired and they need to be moved from the property on a temporary or permanent basis
- Where an applicant from outside the Scheme Area needs to move due to extenuating circumstances e.g. where life is at risk. In this instance, the applicant may be considered for a direct let even when there is no local connection with the area when this is supported by a police recommendation / risk assessment
- Where accommodation is required following emergencies, such as fire, flood, serious harassment or other major incidents
- Where OVH have failed to let the property on the first round of bidding through choice based lettings schemes or historical information indicates the property is unlikely to be let expediently via this route
- Where a targeted offer is made to an applicant who is statutory homeless
- Where a targeted offer is made to a young person leaving the care of the local authority
- Where a targeted offer is made to an applicant living in a scheme council clearance area
- Where a targeted offer is made to certain categories of the Armed Forces community and their families (In line with current Regulations)
- Where a targeted offer is made to an applicant for an adapted property following an assessment by an Occupational Therapist
- Any other reason as supported by OVH's policies and procedures

3.6 In all cases where OVH intends to let properties under this Policy, outside of any nomination agreements, a 'management pro-forma' will need to be completed by the key Neighbourhood Services Officer and approved by a Neighbourhood Service Manager before an offer of accommodation is made.

3.7 The management Pro-forma will ensure decisions to allocate properties are consistent with the reasons outlined above in 3.4 and 3.5 can be justified. The pro-forma will also include a probity check to ensure those involved in processing allocations have no known connections with the potential tenant and no unfair advantage exists.

3.8 OVH will also monitor total numbers of allocations made under this Policy to ensure over time requirements of nomination agreements are met and will adjust future lettings accordingly if thresholds are temporarily exceeded.

3.9 On direct lettings, in order to maintain the right mix of family sizes and balance of those who are economically active within estates or on development schemes, OVH may consider on a case-by-case basis:

- **Giving preference to those in employment** – Applicants or those that respond to adverts will need to provide a letter from employee or accountants certificate / Self-Assessment Tax Calculation Form SA302 - for self-employed applicants
- **Under-occupation** – Where applicants can demonstrate compliance with the above criteria, OVH may consider under-occupying by up to two bedrooms
- **Affordability checks** - OVH will conduct affordability checks on all applicants who have been offered a property in order to identify those who require extra support at the earliest stage possible. Affordability checks will involve the following:
 - Calculating all costs of running a tenancy; including Rent, Council Tax, and other expenses
 - Determining if the applicant can afford the tenancy based on their current income and out-goings, existing debt, the family size and the size of property they have applied for

- 3.10 If the affordability check reveals that an applicant is unlikely to be able afford the tenancy, a referral will be made to the OVH Financial Officer who will determine the extra support they need including benefits advice, maximising income, budgeting support and / or referral to external agencies.
- 3.11 OVH may conduct background checks of those applicants or those who respond to adverts and they will be required to provide a satisfactory reference from existing landlord or similar letter of recommendation from an employer.
- 3.12 OVH will also check previous addresses for incidents of Anti-Social Behaviour, arrears or any other tenancy breach and may exclude or overlook applicants that have been responsible for these acts previously (in line with the ‘unacceptable behaviour categories’ outlined in the PPP Allocations Scheme or similar –see 3.3. above).
- 3.13 OVH will deploy the allocation methods outlined above in 3.4 on properties that have historically proved difficult to let or due to other factors such as where the removal of the spare room subsidy (bedroom tax) has led to a drop in demand.
- 3.14 OVH may also apply these methods on new build properties to create balanced and sustainable communities or where it is necessary to achieve a rapid allocation and secure rental income (within freedoms outside nomination agreements).
- 3.15 Alongside the alternative means of allocating properties, OVH will also consider alternative and non-traditional means of advertising properties including:
- Use of local estate agents
 - Use of Internet based property portals
 - Local media (including newspaper and radio advertisements)
 - Direct marketing (e.g. on-site bill board marketing)
- 3.16 In addition to the alternative means of allocating properties outlined above, OVH may also in response to local circumstances and in consultation with service users and Local Authorities introduce ‘Local Lettings’ Policies.
- 3.17 Local Lettings will include additional allocations criteria that is intended to address specific housing management issues, examples may include (but are not limited to) severe anti-social behaviour or to maintain the character of a block or area in terms of age profile.

3.18	Where OVH introduces Local Lettings Policies, properties may be advertised through the CBL scheme with the additional allocations criteria included, or it may choose to allocate properties in Local Lettings areas via the alternative allocation methods outlined above.
3.19	OVH will deal with tenancy transfer requests logged through the sub-regional Choice Based Lettings Scheme (i.e. Property Pool Plus) or similar scheme depending on the area. In such cases, OVH will assess tenants' eligibility and the merits of the application before deciding whether or not to approve a tenancy transfer.
3.20	Through all means of allocating properties OVH will adhere to the legal framework and will not offer accommodation to any person that would normally be excluded from housing assistance e.g. those who are ineligible due to their immigration status or who have no recourse to public funding or for any of the other exclusion reasons as outlined within the PPP Policy (this will include Right to Rent checks).
3.21	Applicants and those that respond to adverts may utilise the Complaints, Appeals and Feedback Policy (as appropriate) if they disagree with any OVH housing allocation decisions (that directly affect them) made using the provisions set out in this Policy. For appeals about allocations made under the PPP scheme they must utilise the PPP Appeals mechanism (see www.propertypoolplus.org.uk for details).
4	Implementation
4.1	All OVH staff members need to have an awareness of the OVH Allocations Policy to be able to direct any customer queries that arise.
4.2	The Policy will have particular relevance to those staff whose roles are concerned with marketing, advertising and allocating vacant properties including but not exclusive of the Neighbourhood Management Teams, Independent Living Team and Customer Access Teams.
5	Performance
5.1	All performance information in regard to allocations will be reviewed by the Departmental Management Team, Executive Management Team and Managers Performance monitoring meetings with any anomalies reported by exception.
5.2	A separate report will be produced for review by the Executive Management Team on the operation of the additional or alternative allocating criteria as outlined in the OVH Allocations Policy.
6	Consultation
6.1	All OVH staff have been consulted in the development of this Policy. Customer representatives on the Tenant Policy Review Group have been consulted on the review of this Policy.

7				Review			
7.1		The Policy will be reviewed annually from or as near as possible from the date of EMT approval. The review process will ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation that impacts on OVH's obligations in regard to allocations, changes to business practices or in the light of management system audits.					
8				Equality Impact Assessment			
8.1		Was a full Equality Impact Assessment (EIA) required?		Yes			
8.2		When was EIA conducted and by who?		An Equality Impact Assessment was updated 04-03-20 by the Policy and Strategy Manager and the Policy Writer and is still relevant for this review of the Policy.			
8.3		Results of EIA		The Equality Impact Assessment did not identify any adverse impacts for any individual with protected characteristics. There are, however, potential differential impacts on socio-economic grounds (not a protected characteristic) but they are justified with the intention of creating sustainable balanced communities. It is recommended that operation of the Policy is closely monitored by EMT.			
9				Scheme of Delegation			
9.1		Responsible committee for approving and monitoring implementation of the policy and any amendments to it		EMT			
9.2		Responsible officer for formulating policy and reporting to committee on its effective implementation		Operations Director for Housing Services			
9.3		Responsible officer for formulating, reviewing and monitoring implementation of procedures		Operations Director for Housing Services			
10				Amendment Log			
Date of revision:		Reason for revision:		Consultation record:		Record of amendments:	
30 July 2019		In line with review schedule.		See Section 6		A reference to the Housing First Project has been made at section 3.3	
4 th August 2020		In line with review schedule.		See Section 6		<ul style="list-style-type: none"> New Clauses inserted at 3.5, 3.6 and 3.7 	

			<ul style="list-style-type: none"> • Change at 3.8 - Inclusion of provisions for conducting affordability checks on housing applicants who have been offered a property
17 th November 2020	Following review of operational practices	See Section 6	<ul style="list-style-type: none"> • Change at 2.8 – Inclusion that OVH will endeavour to put arrangements for housing applicants with housing debts to pay them back • Change at 3.3 - 3.3.3- Inclusion that OVH reserves the right to refuse nominations made by local authorities and reasons for this • Change at 3.5 – Inclusion of certain categories of Armed Forces communities and their families to the list of non-exhaustive examples of direct lets