

Allocations Policy

1.0 SCOPE

Purpose

- 1.1. The aim of this Allocations Policy is to:
 - allocate homes fairly to meet priority housing needs while creating sustainable communities where turnover is low and where people can live in safety and peace;
 - ensure whg's homes are available to people in the communities in which whg operates; and
 - make the best use of the housing stock whg has available.
- 1.2. Choice is important both to individuals for developing strong communities and for thriving neighbourhoods. whg is committed to achieving balanced, sustainable communities in which people with different incomes, employment, backgrounds, lifestyles, beliefs and support needs can live together cohesively.
- 1.3. 'choose and move' is whg's choice based lettings scheme and the majority of whg properties will be allocated using this scheme. Properties may be advertised through other mediums such as Right Move to meet the requirements of Local Lettings Plans or where a property is difficult to let. The choose and move scheme aims to:
 - be customer and community focused;
 - enable people to make informed choices;
 - reflect whg's housing and regeneration strategies;
 - meet priority housing needs including those of people moving from clearance and demolition sites; and
 - respond to general lettings requests.
- 1.4. whg is committed to ensuring its policies and practices are non-discriminatory. The scheme will be accessible, responsive and sensitive to the diverse needs of our communities. whg's lettings processes adhere to the Equality Act 2010.
- 1.5. whg will keep all customer data secure. Customers may be contacted by letter, telephone, text or electronic medium. We will liaise with support workers or specialist service providers to ensure that all customers can access the 'choose and move' scheme.

Legal and regulatory framework

- 1.6. This Policy is designed to comply with our legal and regulatory responsibilities.
- 1.7. The HCA Regulatory Framework states that Registered Providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of customers and potential customers. They shall demonstrate how their lettings:
- make the best use of available housing;
 - are compatible with the purpose of the housing; and
 - contribute to local authorities' strategic housing function and sustainable communities.

There should be clear application, decision-making and appeals processes.

- 1.8. The Housing Act 1996 (as amended by the 2002 Homelessness Act) - Part VII of the Act concerns the duties that a local authority has to homeless people and when these duties arise.
- 1.9. The Equality Act 2010 requires us to safeguard those with a protected characteristic from direct and indirect discrimination and make reasonable adjustments to ensure an equality of access to all.
- 1.10. Allocation of Housing and Homelessness Regulations 2006 sets out when persons from abroad can be allocated accommodation. These regulations were further amended in 2012.
- 1.11. The Localism Act 2011 gave more freedom to Local Authorities and Social Landlords to establish local rules for re-housing homeless applicants and relaxed the right to a lifetime tenancy.
- 1.12. The Immigration Act 2016 focusses on illegal migration and sets out punitive measures for those who don't "play by the rules".

2.0 ELIGIBILITY

Who is eligible under this scheme?

- 2.1. • Applicants over 18 who meet UK residence requirements.
- Applicants under 18 will only be allowed to register if they are nominated to whg by a local authority, have a priority need, a support worker and someone who is prepared to offer a rent guarantee.

Who is not eligible to join the whg housing register?

- 2.2. At the point of registration for housing all applicants are asked for information about their housing history and legal status, including whether they are persons from abroad or subject to immigration control.

Any applicant deemed ineligible will be provided with a full written explanation for the decision and will have the right to a review. Ineligible applicants may include:

- Applicants who are subject to immigration control unless they fall within a class prescribed by regulations as eligible (see section 2.22).
- Applicants who are not subject to immigration control, but are nevertheless prescribed by regulations as being persons from abroad which may include British citizens (see section 2.22).
- Applicants who do not have a 'Right to Rent' as prescribed by the Immigration Act (2014)
- Applicants who have the right to rent but are not in employment and are not entitled to housing related benefit.
- Applicants (or a member of their household) who are considered unsuitable as a consequence of previous unacceptable behaviour (see section 2.23).
- Applicants that have had access to the Housing Register restricted (see section 2.23).
- Applicants who own a property. This may include those who have recently disposed of a property (see section 2.24).
- Applicants earning in excess of the amount permitted by whg's status as a Registered Charity (see section 2.25).
- Applicants serving a custodial sentence (see section 2.26).
- Single applicants who are in receipt of benefits and if housed may be subject to under occupancy charge or Local Housing Allowance cap and are not prepared to work with whg to secure employment and sufficient income to be able to pay their rent in full.
- Applicants who after investigation are found to have submitted a fraudulent housing application.
- Existing starter or one year fixed tenants in the first year of their tenancy;

should the household circumstances change within the first year, approval for a move may be awarded if the household's circumstances warrant the award of a reasonable preference.

- Students who are ineligible for housing related benefits.
- Any other person as prescribed by the Secretary of State.

3.0 ACCESS TO THE HOUSING REGISTER

- 3.1. The housing register may, on occasion, be closed to some household groups at the discretion of the Director of Housing where there are sufficient numbers on the register to meet letting demands. If this occurs support and advice will be offered to affected applicants.

4.0 THE ALLOCATIONS SCHEME

- 4.1. Applicants are allocated to one of three bands within the scheme. The bands reflect relative housing need of applicants.

Applicants in the **Gold and Silver Band** have reasonable preference within the scheme, with Gold Band having the highest priority.

Applicants in the **Bronze Band** are deemed to be adequately housed or do not live in the relevant local authority area. Tenants of other registered providers will be in Bronze band unless they have been awarded reasonable preference, due to overcrowding or are nominated to whg by the Local Authority.

In specific circumstances, applicants may also be deemed to have **reduced preference** within the scheme.

- 4.2. **GOLD BAND**

The Gold Band will include applicants who have been nominated to whg via the service level agreement that exists between whg and the relevant local authority. Nominations will only be accepted where there is a priority in line with the Nominations Agreement.

This agreement gives local authorities the right to nominate applicants in accordance with the terms of a local nominations or Section 106 agreement. Local authorities may only nominate applicants to whg homes in their respective geographical area.

In addition to local authority nominations, whg will award Gold Band priority where appropriate. The circumstances in which a priority may be awarded are given below.

Care leavers

This priority will be awarded to applicants nominated by the local authority who are:

- Care leavers, who have been in the care of the local authority for a period of 13 weeks or more spanning their 16th birthday, and are now ready to move to independent settled housing.
- Young disabled persons who have been living in residential colleges (which may be outside the local authority area) and want to return to independent living.
- Other persons leaving residential or nursing care and moving into independent living.

A support package must have been established by the local authority and agreed by whg as appropriate.

The award of this priority would be for one offer only and would be subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available.

Clearance priority and permanent decants

This priority will be awarded following a WHG Board decision to clear properties for demolition or alternative use. In some cases a direct match will be the appropriate housing route but applicants will be placed in Gold Band so that they can also bid using choose and move.

Nominations from the local authority will be accepted for tenants of other registered providers.

Priority will be awarded for permanent decants following a special rehousing case approval.

Eligibility for property types will be based on the normal eligibility rules. The award of this priority would be subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available.

Critical

This priority will be awarded where a whg tenant has a critical and exceptional need to move for example where they:

- have suffered a fire or flood or other extreme circumstances that prevents them from remaining in their current home; or
- are unable to remain in their current home due to the risk of serious crime such as domestic abuse.

Nominations from Walsall Council will be accepted for tenants of private landlords, and from other registered providers for their tenants under the Walsall Internal Relocation Protocol.

In most cases a direct match will be the appropriate housing route but applicants will be placed in Gold Band so that they can also bid using choose and move.

The award of this priority would be for one offer only and would be subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available.

Physical

This priority will be awarded where a whg tenant needs to be re-housed as a matter of **urgency** because of a medical need or disability. Their current home might be unsuitable because:

- The applicant has a condition that is expected to be terminal within a period of 12 months and the existing accommodation cannot provide a basis for the provision of suitable care.
- The accommodation is directly contributing to deterioration in the applicant's health such that the condition may become life threatening.
- The applicant has a medical condition, like Leukaemia or a suppressed auto immune disease and is at risk of infection because of severely overcrowded conditions.

Nominations from Walsall Council will be accepted for tenants of private landlords, and from other registered providers for their tenants under the Walsall Internal Relocation Protocol.

In most cases a direct match will be the appropriate housing route but applicants will be placed in Gold Band so that they can also bid using choose and move.

The priority is for one offer of accommodation only subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available.

Better stock use

This priority will be awarded to whg tenants where allowing a move will promote better use of existing stock. The circumstances are:

- A sole tenant or couple releasing a two or three bedroom house will be awarded priority for a move to a flat or bungalow¹ with one or two bedrooms.
- A tenant releasing a four bedroom house or larger will be awarded a priority to move to any property² with one or two bedrooms.
- Priority may be awarded if two households want to transfer into one property and there is a demand for both of the properties that will become vacant.
- Priority will be awarded to a tenant willing to transfer to a suitable non adapted property to release an adapted house or designated older persons' property.
- A sole tenant or couple, not subject to the under occupancy charge, releasing a one bedroom flat and moving to a two bed flat.
- Where a whg tenant who is under-occupying by two bedrooms and can show that they are subject to under-occupation deductions or Local Housing Allowance cap. The property size the household is moving to should be suitable to their housing need and at all times should be more affordable than the property they are leaving.

A direct match may be the appropriate housing route but applicants will be placed in Gold Band so that they can also bid using choose and move.

Applicants with this priority will be allowed three offers of accommodation and the award will be subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available. If priority is withdrawn the original band and effective date will be reinstated.

H.M. Forces

Serving members of HM Forces who have a connection with the relevant local authority area can apply directly to whg for housing six months prior to discharge from the forces and up to six months after discharge. Nominations from the local authority may also be received.

The priority is for one offer of accommodation only.

¹ Subject to age eligibility

² As 1 above

Homeless Households

Applicants will be allowed to bid for accommodation for two weeks following notification of a statutory homeless determination.

The priority is for one offer of accommodation only. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available. This relates to homeless households nominated to whg by Walsall Council.

Homeless prevention

Homeless Prevention Status may be awarded to applicants who are imminently homeless and deemed to be in priority need by the local authority in line with a Nominations Agreement. The applicant will be awarded Gold Band status for the first six weeks.

The priority is for one offer of accommodation only. Auto-bidding will be applied after two weeks of no bids where suitable properties have been available.

Move on from local authority accredited supported care schemes

An applicant is ready to move to independent settled housing from temporary accommodation funded via Supporting People on the recommendation of the support worker. These applicants will be nominated by the local authority.

A support package must have been established and agreed by whg as appropriate.

The priority is for one offer of accommodation only. Auto-bidding will be applied after two weeks of no bids where suitable properties have been available.

Social need

A social need may be considered in situations where an applicant:

- Has an urgent need to move to give or receive care that is substantial and ongoing. This may include applicants wishing to foster supported by the Local Authority.
- Is overcrowded by two bedrooms as defined by the Bedroom Standard?³
- Is a joint tenant of a whg property where a relationship has irretrievably broken down and the situation is having a detrimental effect on dependent children? The partner who has parental responsibility and is in receipt of the child benefit will be awarded the sole tenancy of the family home. The partner who is moving out will be awarded a Gold Band Priority for a move to single person accommodation.

³ See Appendix A

- Is a whg tenant, private tenant or lodger unable to provide a suitable home for children who have been in the care of the local authority?
- Any other serious case at the discretion of the Director of Housing.

Non whg tenants may be nominated by the local authority. The award of this priority would be for one offer of accommodation only and will be subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available.

A direct match may be the appropriate housing route but applicants will be placed in Gold Band so that they can also bid using choose and move.

Non-tenant occupants of whg homes

whg may accept responsibility to re-house persons left in possession of a whg property after a tenancy has ended if the applicant is:

- A relative of the former tenant who on the tenant's death, is left in occupation of what can be described as the family home where there is no succession right.
- A relative of the former tenant who, because the tenant has been forced through ill-health/physical condition to move to more suitable accommodation (long stay hospital or Part III accommodation), are left in the family home.
- A lodger left in possession of the property after the tenancy has ended, where there are no succession rights and they have been a part of the household for at least the preceding 12 months but are not eligible for that property type or are unable to afford it due to under occupancy.
- A lodger left in possession of the property after the tenancy has ended, where there are no succession rights and they have been part of the household for at least the preceding 12 months and are eligible for that property type. A direct match to that property will be completed for these cases by choose and move once the special rehousing case has been approved.
- A lodger who gave up their own accommodation at least 12 months before, to move in with the tenant to provide constant assistance where otherwise a statutory agency would have had to provide assistance.
- A lodger who has a legal right to succeed to the tenancy of the property but is prepared to accept the offer of a bed-sitter or flat.
- A former joint tenant who has been left in the property following the breakdown of their joint tenancy and will be under occupying.

The priority is for one offer of accommodation only and would be subject to six monthly reviews. Auto-bidding will be applied after six weeks of no bids where suitable properties have been available.

Voluntary Right to Buy Porting

A Gold Band Porting priority will be awarded for customers allowed to port their right to buy as described in the Right to Buy and Right to Acquire Policy.

4.3. SILVER BAND

The Silver Band may be awarded if the applicant is deemed to have a recognisable housing need which will give the applicant reasonable preference within the scheme.

The award may be applied if the applicant:

- Is a whg tenant, living in a two bedroom flat with one or two dependent children. The applicant will be eligible for a two bedroom house only. For applicants with dependant children living in a three bedroom flat eligibility for a house will be determined by the Bedroom Standard.
- Is a whg tenant, has a moderate medical condition or disability and is living in accommodation that is unsuitable because they are unable to mobilise adequately or the accommodation is directly contributing to their ill health.
- Is overcrowded by one bedroom (as defined by the Bedroom Standard). The applicant will be eligible for a suitably sized property (the move cannot be like to like).
- Needs to access social services facilities and is unable to travel from their existing location.
- Is a lodger with a partner/joint applicant who is also lodging and they are unable to live together as a couple in either property.
- Is a whg tenant who is under-occupying by one bedroom and can show that they are subject to under-occupation deductions, or Local Housing Allowance.
- Is a lodger deficient by one bedroom as defined by the Bedroom Standard.

The priority is for three offers of accommodation only, except moderate medical priority which is for one offer only, and would be subject to six monthly reviews.

A direct match may be the appropriate housing route but applicants will be placed in Silver Band so that they can also bid using choose and move.

4.4. **BRONZE BAND**

Applicants who do not qualify for reasonable preference are awarded the Bronze Band. This includes applicants who:

- Are adequately housed and are not bedroom deficient according to the National Bedroom Standard.
- Live outside the relevant local authority area.
- Are tenants of other registered providers unless awarded reasonable preference.

The priority is for three offers of accommodation only.

4.5. **REDUCED PREFERENCE**

Applicants who would otherwise be awarded Gold, Silver or Bronze Band may have the award deferred if they have:

- Rent arrears or another housing related debt within the meaning of this scheme.
- A breach of a tenancy agreement that is unresolved and is not subject to court proceedings.
- A home that does not meet the standard required for a transfer applicant due to alterations having been completed without permission or due to damage or neglect.

The application will be given Reduced Preference until the applicant has demonstrated that they have taken the steps necessary to remedy the breach or to modify their behaviour. If the breach has been remedied within 12 months the applicant will be allowed to keep the original date of the application. If the breach is not remedied within 12 months the application will be suspended until the applicant has remedied the breach. Once the breach has been remedied the applicant will need to request that their application be made active again. They will then be given a new effective date from the date of the request

Further information is contained in whg's Reduced Preference Protocol.

4.6. **MANAGEMENT INFORMATION**

'choose and move' is whg's default scheme for allocating properties. In exceptional circumstances management discretion may be used to meet an emergency or urgent housing need. This includes permanent decants. In such circumstances, and if all other housing options have been explored, the applicant will be awarded priority and made a direct offer of accommodation through the Special Rehousing Protocol. The award will be authorised by the Housing Services Manager. Where a policy override is required to allow a move, approval will be obtained from the Director of Housing

A list will be kept of all applicants given Gold Band priority and re-housed with a policy override. The list may be reported to the Group Executive Team annually for monitoring purposes.

4.7. **ADAPTED HOMES⁴**

Properties that have fixed equipment or adaptations designed to meet the needs of a disabled person may not be advertised though the choose and move scheme. Examples include properties that have specific characteristics or features including:

- a vertical lift
- a low level kitchen
- a fixed or tracked ceiling hoist
- an extension to meet disability needs
- an adapted bathroom e.g. bath with electrically operated seat and other adaptations
- assistive technology
- a flat floor shower (in a house, a non-OAP ground floor flat or flat in a block that has lift access)

These properties may be offered directly to an applicant given Gold Band reasonable preference. Households with the oldest critical housing need will be given priority.

4.8. **EXEMPT LETTINGS NOT COVERED BY THE CHOOSE AND MOVE SCHEME**

The following are not allocations under this scheme:

- converting a Starter Tenancy into an Assured Tenancy
- issuing a new fixed term tenancy after the previous fixed term tenancy has

⁴ This will include homes that have had a purpose built extension containing any of the listed facilities

ended

- assigning mutual exchanges and successions to a tenancy
- mortgage rescues
- market rent lettings

4.9. **BAND ROTATION**

Properties will be advertised to ensure that where possible households with the greatest housing need get first choice for available homes. A proportion of our homes may be advertised to the Bronze Band. Each bidding cycle homes will be advertised proportionately to the following bands:

- 50% Gold Band
- 30% Silver Band
- Up to 20% Bronze band

The homes available to let in each area are allocated to a band so as to achieve the 50:30:20 split with some properties being advertised as available to more than one band to ensure that we have a viable list of applicants interested in all the properties. Band rotation proportionality may be adjusted at the discretion of the Director of Housing.

Annually, a proportion of properties will be advertised with a priority to non whg applicants in order to make our housing offer available to a wider section of the community. The percentage of lettings to transfers can be adjusted at the discretion of the Director of Housing.

4.10. **PRIORITISING BIDS**

Properties available in each bidding cycle will be labelled so that applicants know who can apply.

The criteria used may include one or more of the following:

- medical need
- age of customer
- size of household
- local lettings policies
- band
- closing date for applications
- type of property
- the weekly target rent (including any service charges)
- non whg tenants

4.11. IMMEDIATELY AVAILABLE PROPERTIES (FAST TRACK)

It may be necessary on occasions to let properties outside the normal cycle of advertising. Generally this is where properties have attracted insufficient or unsuitable bids during the normal advertising cycle, where it is known that a property will be difficult to let or where a property is immediately available. These properties will be offered to the applicant who meets the criteria on a first come first served basis.

4.12. BIDDING FOR PROPERTIES

Applicants can express an interest in up to three properties in each bidding cycle and a further three properties advertised as immediately available.

Applicants will be offered a range of bidding options, the primary mechanism being through the 'choose and move' on line portal.

4.13. ELIGIBILITY

Different households are eligible for different property types. This is set out in the table below.

Property Type	Bedrooms	Eligible Family Size
Bedsitter/studio flat	0	Priority will be given to a single applicant under the age of 35 in reasonable preference and affected by the Local Housing Allowance. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Multi Story Flat	1	Priority will be given to couples, followed by single applicants who are not affected by the Local Housing Allowance or a single whg tenant in reasonable preference. Other single applicants may apply. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Multi Story Flat	2	Priority will be given to families who are in reasonable preference with one or two children who have a two bedroom need, applicants 28 weeks pregnant with a first child or two adults

		wanting to share. Followed by a couple or a single applicant not affected by the Local Housing Allowance/under occupancy charge. Other couples may apply. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Maisonette	2	Priority will be given to families who are in reasonable preference with one or two children who have a two bedroom need, applicants 28 weeks pregnant with a first child or two adults wanting to share. Followed by a couple or a single applicant not affected by the Local Housing Allowance/under occupancy charge. Other couples may apply. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Maisonette	3	Priority will be given to families with a three bedroom need or three adults wanting to share. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Low Rise Flat	1	Priority will be given to couples, followed by single applicants who are not affected by the Local Housing Allowance or a single whg tenant in reasonable preference. Other single applicants may apply. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Low Rise Flat	2	Priority will be given to families who are in reasonable preference with one or two children who have a two bedroom need, applicants 28 weeks pregnant with a first child or two adults wanting to share. Followed by a couple not affected by the Local Housing Allowance/under occupancy charge. Other couples may apply. Where a property is advertised to bronze band, priority will be given to non whg tenants. Single working applicants not affected by the Local Housing Allowance may be considered at the

		discretion of the Housing Services Manager.
Low Rise Flat	3	Priority will be given to families with a three bedroom need or three adults wanting to share. Where a property is advertised to bronze band, priority will be given to non whg tenants.
House	1	Priority will be given to couples, followed by single applicants who are not affected by the Local Housing Allowance or a single whg tenant in reasonable preference. Other single applicants may apply. Where a property is advertised to bronze band, priority will be given to non whg tenants.
House	2	Families with one child or two children, with a two bedroom need.
House	3	Priority will be given to families with a three bedroom need. Where a property is advertised to bronze band, priority will be given to non whg tenants.
Parlour Type House (2 reception rooms)	3	Priority will be given to families who have a medical priority for this type of property, followed by families who have a four bedroom need. Families who have a 3 bedroom need may apply.
House	4	Families with a four bedroom need
House	5	Families with a five bedroom need
House	6	Families with a six bedroom need

Property Type	Bedrooms	Eligibility Family Size
Age restricted Bungalow	1	A single applicant or couple over the age specified in the advertisement.
Age restricted Bungalow	2	A single applicant or couple over the age specified in the advertisement (a live in carer over 16 will be allowed)*. Priority will be given

		to applicants not affected by the Local Housing Allowance.
Age restricted Flat	1	A single applicant or couple over the age specified in the advertisement. Priority will be given to applicants not affected by the Local Housing Allowance.
Age restricted Flat	2	A single applicant or couple over the age specified in the advertisement (a live in carer over 16 will be allowed)*. Priority will be given to applicants not affected by the Local Housing Allowance.
Age restricted Bed sitter	0	A single applicant over the age specified in the advertisement. Priority will be given to applicants not affected by the Local Housing Allowance.

The definition of a household is a family or more than one household coming together when it can be shown that re-housing would lead to a sustainable tenancy and would be in the best interests of the new combined household.

* The carer must be in receipt of carers allowance for the applicant or joint applicant.

The advertisement will clearly indicate who is eligible to apply for each property such as a single person or family with two children.

Please note that an applicant must have at least one dependant child to apply for a house. One of the applicants must be in receipt of Child Benefit for the dependant child.

Where parents are separated the person who receives child benefit is counted as having parental responsibility and the child is counted as living with this parent.

The rules on eligibility may be varied by local lettings plans agreed by the WHG Board. Alternatively, in exceptional circumstances, the rules might be varied to meet the needs of a particular applicant or home.

4.14. HOW ARE BIDS PRIORITISED

The eligible applicant with the earliest effective date will generally be offered the property first. The effective date is the deciding factor when customers in the same band bid for a property. In most cases the effective date will be the registration date which is the original date of application.

An applicant's effective date may change in the following circumstances:

- If an applicant has changed address and/or tenure.
- Young people in the care of a local authority will, at the age of 18, be given an effective date of their 16th birthday.
- An owner or former owner who is approved for housing will be given an effective date of the date of the approval rather than the date of initial application.
- An applicant whose circumstances change for the worse, resulting in them being awarded a Silver or Gold Band, will have an effective date corresponding with the date of the new award.
- An applicant whose circumstances change for the better, resulting in them losing their Gold or Silver Band, will retain their original effective date.
- An applicant who loses their reasonable preference due to refusing an offer will be awarded the band they would have been awarded had they not had that reasonable preference. Their effective date will be the date of the change in their award.
- An applicant whose change in circumstances results in them no longer being eligible under the scheme will have their access to the housing register withdrawn.

4.15. SUITABILITY TEST AND REFERENCES

Applicants must provide all the evidence required to verify their application and determine any reasonable preference. The applicant and their household must provide proof of identity, residence and suitability before an offer is deemed to be valid.

The following items will be accepted as proof of identity:

- valid photo identification
- driving licence
- passport
- or any other document requested to evidence your right to rent

The following items will be accepted as proof of residence:

- utility bill
- telephone bill
- demand for council tax
- water bill
- benefit award notice

References will be required as proof of suitability and can be provided by:

- a bank or building society
- an employer or former employer
- teacher, social worker, support worker, probation officer
- former landlord or current landlord if you have a tenancy
- other suitable referee at the discretion of the Housing Services Manager or Lettings Manager

4.16. TENANCY SUSTAINABILITY ASSESSMENTS

A sustainability assessment will be carried out with all new and transferring customers to identify customers who require support to sustain their new tenancy. The assessment will be completed prior to the tenancy agreement being signed and will consist of a vulnerability assessment and an affordability test.

If the vulnerability assessment highlights a high or medium risk, the applicant will be referred to a whg team or external agency able to offer support to help the applicant sustain the tenancy.

If the affordability assessment highlights a high risk, the applicant may not be offered an affordable rent tenancy nor will they be allowed to under occupy a property if they are in receipt of benefits and the property is considered unaffordable. A referral will be made to money advice team for further support.

If the assessment highlights a medium risk, the applicant will not normally be allowed to under occupy a property if they are in receipt of benefits. A referral will be made to the money advice team for further support.

Any applicant refusing to attend may have their access to the housing register restricted.

4.17. MY HOME MY WORLD

All customers allocated a home are required to sign up to whg's My Home My World commitment. Customers who do not sign up to this commitment may have the offer of accommodation withdrawn.

4.18. REFUSALS

Where an applicant refuses an offer they will be contacted to discuss the reasons for their refusal.

If an applicant refuses all their offers, depending on their reasonable preference and the reason for the award, whg will determine whether the offers were reasonable and if the applicant should be eligible for a further offer. If the offers are determined to be reasonable the application will be suspended for 12 months.

After the 12 months suspension it is the applicant's responsibility to request that their application be reactivated. 'choose and move' will ensure that their circumstances are updated where necessary and the original effective date will be kept so long as there are no circumstances that would lead to a change of effective date.

4.19. RESULTS

The bidding results for each advertised property will be published on our website and at all our premises as soon as possible after the bids are closed.

4.20. ACCESS RESTRICTED AT OFFER STAGE

In some situations the applicant at the top of the list for a property may have their access restricted at the offer stage. Examples include:

- Applicants who are unable to provide suitable references.
- Known and proven perpetrators of domestic abuse, racial harassment or violence will not be offered a property that is in close proximity to the victim of this behaviour.
- Applicants deemed unsuitable for an offer of this or any other property because of unacceptable behaviour as defined at 2.23.
- Not having the Right to Rent.

The applicant not considered suitable for an offer will be advised, in writing, of the reasons for the decision. The applicant will have the right to appeal against this decision (see 2.29).

4.21. PRE-TENANCY TRAINING

Applicants, who have not previously held a whg tenancy, will be required to attend training to prepare them for their tenancy with whg. The training will usually take place before an offer of a property is made. Any applicant refusing to attend will have their access to the housing register restricted.

4.22. RENT IN ADVANCE

Applicants will be required to pay at least one week's rent in advance before they sign the tenancy agreement. This includes customers who are in receipt of full benefits. Subject to receipt of a completed Direct Debit mandate, customers who wish to pay monthly or weekly by Direct Debit will be allowed to spread their payments over a period of 12 months, in order to become one month in advance of their rent. Applicants who will not make the payment in advance may be overlooked for an offer of accommodation, in preference for an applicant who will.

All applicants will be required to complete a direct debit mandate for rental payments, whether or not they have benefit paid directly to whg for their rent. Whilst rent is paid in full by benefits directly to us, the Direct Debit mandate will not be processed.

4.23. APPLICANTS SUBJECT TO IMMIGRATION CONTROL AND APPLICANTS FROM ABROAD

Access to housing for foreign nationals is governed by Housing and Immigration legislation. Any such applications will be registered and deferred whilst whg carries out checks to establish eligibility under the relevant legislation.

In all cases Right to Rent Checks will be undertaken prior to a customer being awarded an offer of accommodation.

4.24. RESTRICTED ACCESS

Applicants may have their award placed in Reduced Preference (see section 2.4.4) to give them the opportunity to resolve issues that might otherwise restrict their access to the housing register. A Restricted Access Policy exists to deal with anti social behaviour and other tenancy breaches that can't be resolved with

Reduced Preference due to the seriousness of the issue. An application would be restricted if an applicant or member of their household demonstrated behaviour which would entitle a landlord to possession under any of the Grounds 1 to 17, set out in Schedule 2 of the Housing Act 1988.

Applicants who are not eligible to join the housing register due to having a fraudulent housing application will have their access restricted under the Restricted Access Policy.

4.25. HOME OWNERS/FORMER HOME OWNERS

Applicants who are owners, or who have disposed of a property within the last two years, will be registered and deferred whilst whg carries out checks to establish eligibility. Applicants will be contacted and asked to provide the information required to determine eligibility to join the scheme. If the property has been sold in the last two years, evidence will need to be provided regarding equity from the sale of the property. If the property has not yet been sold, it must be on the market at the time of the application otherwise access to the housing register will be restricted. Before an offer can be made the property must be sold subject to contract.

4.26. INCOME AND EQUITY

In accordance with whg's status as a registered charity, applicants/joint applicants who are working with an income above the threshold determined by whg will be ineligible to join the scheme.

Single applicants with a gross annual income above £40,000 will not be eligible to register.

Joint applicants with a combined gross income above £50,000 will not be eligible to join the scheme.

If an applicant is below the age of 55, the upper free equity level is £50,000. Applicants who have a free equity in excess of this amount will not be allowed access to the waiting list.

The Housing Services Manager may approve re-housing where income or equity is in excess of these levels if there are other proven factors which make re-housing elsewhere unlikely.

If an applicant is aged 55 or over the upper free equity level is £150,000. This is because applicants with free equity above that level should be able to secure accommodation elsewhere and not at the expense of other elderly customers who do not have the same resources.

The Housing Services Manager may approve re-housing of an applicant aged 55 or over with a free equity of over £150,000 if there are other proven factors which make re-housing elsewhere impossible or if whg has properties for which there is insufficient demand.

An applicant deemed ineligible will be provided with a full written explanation for the decision and will have a right of review of the decision.

The income and equity levels may be increased in accordance with whg's status as a registered charity.

At the point of registration for housing the application will be registered and deferred whilst whg carries out checks to establish eligibility.

An applicant deemed ineligible will be provided with a full written explanation for the decision and will have a right of review of the decision.

4.27. PRISONERS

Persons serving a custodial sentence cannot accrue waiting time whilst in prison but where a prison or probation officer confirms a release date, in writing, they may register 28 days in advance of that release date.

The released prisoner must complete a new form within 28 days of the date of release giving up to date contact details.

4.28. RE-REGISTRATION AND CHANGES IN CIRCUMSTANCES

Applicants will be contacted annually to check the details on their application for accuracy and confirm if they wish to remain on the housing register.

Applicants who do not respond to the initial request will be sent a reminder letter after 28 days. The application will be cancelled without further notice if they do not update their application within 14 days.

A change in circumstance must be reported separately and may require completing a new application.

4.29. CLOSED AND CANCELLED APPLICATIONS

whg will only cancel an application at the customer's request or where an application remains incomplete after 28 days.

Where an applicant has failed to respond to a letter requesting contact and/or further information the application will be closed. The application can be reactivated by choose and move if appropriate.

4.30. APPEALS AND REVIEWS

An appeal against a decision or a request for review will be dealt with using the same procedure and timescales used for complaints. Details of whg's complaints process can be downloaded from the whg web-site and is available on request if an applicant does not have access to internet services.

5.0 PERFORMANCE MEASURES

- 5.1. We are committed to monitoring the operation of the Policy to ensure it does not adversely impact on or discriminate against specific groups in the community. To this end, we will participate in the national common recording system for lettings (known as CORE).
- 5.2. Performance will be measured and reported annually and will include:
 - the proportion of lettings to BME applicants
 - customer satisfaction with the Lettings Service; and
 - CORE returns
- 5.3. Local offers include targets to:
 - verify completed housing applications in five working days where all relevant information has been provided; and
 - make appointments for applicants to view a property they have been offered before they enter into a new tenancy with whg

6.0 MONITOR AND REVIEW

- 6.1. This Policy will be monitored by the Director of Housing and reviewed every three years by the Policy Group, Customer Services Committee and whg Board.

APPENDIX 1

The Welfare Reform Act 2012 sets out the benefit entitlement in relation to the number of bedrooms required by a household. whg has adopted this methodology to determine the number of bedrooms a household is entitled to under the Allocations Policy. A separate bedroom should be allocated to the following persons:

- (a) a person living together with another as husband and wife (whether that other person is of the same sex or the opposite sex)
- (b) a person aged 16 years or more
- (c) two persons of the same sex aged 10 years to 15 years
- (d) two persons (whether of the same sex or not) aged less than 10 years
- (e) two persons of the same sex where one person is aged between 10 years and 15 years and the other is aged less than 10 years
- (f) any person aged under 16 years in any case where he or she cannot be paired with another occupier of the dwelling so as to fall within (c), (d) or (e) above

The Housing (Overcrowding) Bill (Bill 46) was not passed by Government however it is cited as good practice nationally and is therefore the standard by which whg will measure overcrowding levels for the purpose of awarding 'reasonable preference'.

Applicants who claim they are overcrowded will have their circumstances assessed against the Bedroom Standard. The table below shows the bedroom entitlement for adults and children according to the bedroom standard

Household Members	Number of bedrooms required
Single Adults over 16	1
Couple (married or cohabiting) wishing to live together	1
Woman 28+ weeks pregnant with first child	2
One child	1
Two children under 10 regardless of sex	1
Two children of the same sex aged between 10 and 15	1
Two children of different sex aged between 10 and 15	2

Example 1: a family with a daughter aged five and son aged one will need one bedroom for the parent(s) and one for the two children to share.

Example 2: a family with a daughter aged 10 and son aged 14 will need one bedroom for the parent(s) and a bedroom for each for the two children.

Version Control

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Equality analysis	Undertaken February 2017
Key changes made	Details of all changes are specified in a separate document held by the Lettings Manager