

Restricted Access Policy

1.	SCOPE
	Purpose
1.1	This Policy details the principles to be adopted by whg when restricting access to the housing register and other assets owned or managed by whg. It supplements the Allocations Policy as there are occasions when it is reasonable for whg to restrict access to its housing and assets.
	Legal and regulatory framework
1.2	The Housing Act 1996 allows for applicants to be disqualified from a housing register in certain circumstances; for example, if applicants are disqualified on the grounds of anti-social behaviour.
1.3	The Regulator of Social Housings Tenancy Standard states that registered providers shall clearly set out, and be able to give reasons for, the criteria they use for excluding actual and potential tenants from consideration for allocations, mobility or mutual exchange schemes.
2.	POLICY STATEMENT
	Principles
2.1	whgs's Allocations Policy aims to: <ul style="list-style-type: none"> • Allocate homes fairly to meet priority housing needs whilst creating sustainable communities where people can live in safety and have quiet enjoyment of their homes; and • Ensure our homes are accessible to all eligible people in the communities in which we work.
2.2	This Policy supplements the Allocations Policy in order to support and not undermine its aims, as there are occasions when it is reasonable for whg to restrict access to its housing and assets.
2.3	It recognises that a decision to restrict access must have sound reasons and be undertaken in a fair and equitable manner. This Policy therefore specifies the situations in which applicants' access to our homes and assets may be restricted.
2.4	Cases will normally be considered on their individual merits and efforts made to resolve any possible ineligibility through positive interventions; however, this may not apply where there are safety concerns or incidents involving violence and aggression.
2.5	whg would normally restrict access to its housing register and assets where the applications are subject to the following: <ul style="list-style-type: none"> • Applicants (including former tenants) where there is evidence that they, identified members of their household, or their visitors, have acted anti-socially such that they would have been in breach of the whg tenancy agreement; or

	<ul style="list-style-type: none"> • Applicants where they, members of the applicants’ household or visitors to their home are included in, or party to legal proceedings that are affecting a tenancy. At the time of writing these include: <ul style="list-style-type: none"> i. A Possession Order – arising from their own actions or a tenancy breach; ii. A Criminal Behaviour Order or similar; iii. An Injunction; or • Applicants where they, members of their household or their visitors are persons whom the Police, Social Services or Probation Services formally advise us should not be allowed access to whg properties. This could be in order to protect the community or to prevent or reduce crime and disorder in the area; or • Applicants who have demonstrated or threatened violence towards whg colleagues, contractors and others working on behalf of whg (including verbal abuse); or • Applicants who have knowingly or recklessly failed to provide accurate information or have knowingly withheld relevant information from their application form or in interviews with whg colleagues; or • Applicants where there is clear evidence that they or members of their household, or visitors to their home have been involved in housing related criminal acts and there is a risk of that behaviour continuing. (including for example, crimes against the person/property in the neighbourhood); or • Applicants with an existing and relevant Notice of Seeking Possession; or • Applicants, tenants, or former tenants who have a debt with whg or another Registered Provider. Access to the waiting list should not be restricted for applicants with a debt if the following circumstances apply: <ul style="list-style-type: none"> i. Where the applicant has been awarded reasonable preference for re-housing by the Local Authority and the circumstances are such that the debt may be overlooked; ii. Where the applicant has entered into an acceptable agreement and is making regular payments in accordance with that agreement. This may include under-occupation; iii. Where the debt has been fully discharged by agreement; <p>Local Authorities have a duty towards applicants who have been found to be statutorily homeless but whg may refuse to accept a nomination if the applicant falls within the categories for restriction listed above.</p>
2.6	<p>To ensure proportionality and fairness, any decision to restrict access will:</p> <ul style="list-style-type: none"> • Be based on evidence of the alleged behaviour, which may include colleague statements, incident records, correspondence or other relevant information • Be proportionate to the behaviour or risk identified • Consider vulnerability and personal circumstances • Be recorded with rationale • Be subject to review • Consider whether behaviour is historic or current • Consider whether any appropriate support or interventions have been offered or attempted, where relevant to the circumstances
2.7	<p>Where access is restricted, the applicant will be informed in writing of:</p> <ul style="list-style-type: none"> • The reasons. • Evidence relied upon, which may include colleague statements, incident records, correspondence or other relevant information. • The duration (maximum two years).

	<ul style="list-style-type: none"> • What actions may support earlier review. • How to appeal.
2.8	<p>Before restricting access, whg will also consider any vulnerabilities, including any reasonable adjustment requirements, an applicant might have; this will be done in line with our Vulnerability Policy. Examples are:</p> <ul style="list-style-type: none"> • Being a victim of domestic abuse • Mental or physical health conditions • Medication impacts • Cultural or language barriers • Neurodiversity
2.9	<p>Customers may appeal a decision to restrict access within 28 days from the date of the letter confirming the decision. Appeals may be submitted:</p> <ul style="list-style-type: none"> • In writing • By email • By telephone (recorded and confirmed in writing) • With support from an advocate <p>Late appeals may be accepted where there are mitigating circumstances.</p> <p>Appeals will be reviewed by a more senior colleague not involved in the original decision and an outcome will be provided within 14 days of receiving the appeal.</p> <p>If an applicant feels there had been a service failure in respect of the appeal process, e.g. whg did not respond within the timescales outlined above, they can make a formal complaint, please see the Customer Complaints Policy.</p>
2.10	<p>Restrictions will normally apply for a maximum of two years. At the end of the restriction period, the applicant must notify whg if they wish to be considered for housing again. A review will then be undertaken based on current circumstances and evidence of change. Where adverse or unacceptable behaviour reoccurs, a further restriction period may be applied.</p>
2.11	<p>If information becomes available after an application has been accepted which meets the criteria for restriction, whg may:</p> <ul style="list-style-type: none"> • Suspend the application • Investigate • Apply restriction where appropriate <p>The applicant will be informed in writing.</p>
3.	PERFORMANCE MEASURES
3.1	Key performance indicators (KPI's) are in place linked to the whg Allocations Policy.
3.2	whg will carry out annual monitoring of the demographics of customers subject to restricted access to ensure no groups are disproportionately affected. This will be reported to Customer & Operations Panel and any issues identified, addressed promptly by the Assistant Director of Housing – Customer.

4.	EQUALITY AND DIVERSITY
4.1	An equality impact assessment has been completed for this policy, and its impact will be monitored annually to ensure no groups are disproportionately affected by the policy.
5.	TRAINING AND DISSEMINATION
5.1	This policy will be communicated to all relevant colleagues and made available on internal systems. Managers will ensure colleagues are aware of the policy, and appropriate training will be provided where required.
6.	MONITOR AND REVIEW
6.1	This Policy will be monitored by the Director of Housing and Customer Services and reviewed every three years by the Customer & Operations Panel.
7.	ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES
7.1	<p>Documents, policies and procedures associated with this policy are:</p> <ul style="list-style-type: none"> • Acceptable Behaviour Policy • Allocations Policy • Anti-social Behaviour Policy • Fraud Prevention Policy • Reduced Preference protocol • Tenancy Policy • Vulnerability Policy

Appendix

This appendix provides illustrative examples to support understanding of how the Restricted Access Policy may be applied in practice. These examples are not exhaustive and do not remove the requirement for each case to be considered on its individual merits.

1. Anti-Social Behaviour (ASB)

Example A - Ongoing Serious ASB

An applicant was evicted from a previous tenancy due to persistent anti-social behaviour including noise nuisance, harassment of neighbours and property damage. Court action was taken and a possession order granted.

Outcome: Access to the housing register may be restricted due to risk of repeat behaviour and impact on community safety.

Example B - Historic ASB with Evidence of Change

An applicant previously received warnings for anti-social behaviour five years ago but has since maintained stable accommodation with no further incidents.

Outcome:

Restriction would not normally apply where there is clear evidence of sustained behavioural change.

2. Violence or Abuse Toward Colleagues

Example A - Threats to whg colleagues

An applicant makes credible threats of violence towards whg colleagues during an office visit and Police are notified.

Outcome: Access may be restricted to protect colleagues and customers.

Example B- Distress Linked to Vulnerability

An applicant raises their voice during a meeting while experiencing a mental health crisis. Medical evidence confirms distress can occur at times but the behaviour is not repeated.

Outcome: Restriction may not apply where behaviour is clearly attributable to vulnerability and risk is manageable through support.

3. Housing Related Criminal Activity

Example A- Drug Supply from Property

An applicant or household member has been convicted of supplying drugs from a previous tenancy and there is evidence suggesting ongoing risk.

Outcome: Access may be restricted to protect the wider community.

Example B- Historic Offence with Rehabilitation

An applicant has a historic conviction unrelated to housing or community safety and has demonstrated rehabilitation.

Outcome: Restriction would not normally apply.

4. Legal Proceedings Affecting Tenancy

Where an applicant or household member is currently subject to:

- A Possession Order
- An Injunction relating to housing behaviour
- A Notice of Seeking Possession for serious breach

Outcome: Access may be restricted until the matter is resolved and risk reassessed.

5. Misrepresentation or Withholding Information

Example A- Deliberate False Information

An applicant knowingly provides false information about household members to improve eligibility.

Outcome: Access may be restricted due to deliberate misrepresentation.

Example B- Error Without Intent

An applicant fails to disclose previous accommodation due to misunderstanding the form.

Outcome: Restriction would not normally apply where no deliberate intent is identified.

6. Housing-Related Debt

Example A - Unresolved Debt

An applicant owes significant former or current tenant arrears and is not engaging in repayment discussions.

Outcome: Access may be restricted.

Example B - Active Repayment

An applicant has rent arrears but is maintaining an agreed repayment plan.

Outcome: Restriction would not normally apply.

7. Safeguarding and Vulnerability Considerations

Before restricting access, whg will consider:

- Domestic abuse
- Mental or physical health conditions
- Medication impacts
- Neurodiversity
- Financial hardship outside the applicant's control

Example – Domestic Abuse Survivor

An applicant accrued arrears after fleeing domestic abuse and can evidence this.

Outcome: Restriction would not normally apply where circumstances were outside the applicant's control.

8. Duration and Review

Restrictions normally apply for a maximum of two years.

At the end of the restriction period:

- The applicant must notify whg if they wish to be reconsidered.
- A review will assess current circumstances and evidence of change.

Outcome: Where behaviour reoccurs, a further restriction period may apply.

9. Applications to Join Existing Tenancies

This policy also applies to individuals seeking to:

- Be added as a household member
- Succeed to a tenancy
- Be granted a joint tenancy

Example

An individual seeking to join a tenancy is subject to an active injunction for serious anti-social behaviour.

Outcome: whg may refuse the application under this Policy.

Document author	Assistant Director of Housing - Customer
Document owner	Director of Housing and Customer Services
Version and status	v2.0 LIVE
Legal advice	Advice sought from Housing Litigation Manager
Consultation	Customer focus group conducted
Approved by	Customer Service Oversight Committee – May 2026
Review Date	Quarter 1 - 2029
Transformational Programme	<ul style="list-style-type: none"> • Data-driven decisions • Forward-thinking services
Equality Assessment	Due to minor amendment, will not be required until full Policy review
Key changes made	<ul style="list-style-type: none"> • Clearer framework for decision-making, review points, and evidence retention & introduction of defined review trigger process (customer-led review at 2 years). • Appeals no longer limited to written format. • Clearer guidance for colleagues assessing applications. • Expanded Section 2 to clarify triggers for restriction. • Explicit inclusion of applications to become household members. • Removal of automatic review requirement. Instead, customer may request review at end of period. • Clarified approach where restriction criteria are identified after an application is accepted. • Expanded vulnerability safeguards. • Revised appeals section allowing flexibility and non-written appeals. • Inclusion of illustrative examples (appendix).