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1 Introduction

- 1 Adullam Homes Housing Association (**AHHA, us or we**) is a Community Benefit Society created to support vulnerable individuals and households. Since 1972 we have been serving people in a variety of ways from various locations across the UK. Historically, we have been commissioned to provide accommodation and support to the following groups of people:
 - a) homeless women/men with dependent children
 - b) teenage parents
 - c) women fleeing domestic violence
 - d) homeless people
 - e) young people leaving care
 - f) people with learning disabilities
 - g) people with mental health support needs
 - h) people with an identified support need or considered vulnerable, but who are capable of a basic degree of independent living
 - i) people with substance or alcohol misuse needs
 - j) people with challenging behaviour
 - k) people who are HIV positive and have AIDS.
 - l) people who have experienced the Criminal Justice system
 - m) refugees.
- 1 AHHA aims to help people across various needs groups to access safe, comfortable accommodation and to support them to go on to lead independent lives in accordance with our:
 - a) mission statement: “restoring hope and dignity through quality housing and support”; and
 - b) values:
 - i. valuing the individual
 - ii. integrity and fairness
 - iii. striving for excellence. A key part of our aims, mission and values is to provide people who need help to live independently with:
 - c) quality, affordable housing in a fair, transparent and consistent manner to promote sustainable communities;
 - d) tailored support plans, training, education and employment opportunities to help our customers to achieve stable lives and realise their full potential. This includes supporting customers to improve their employability and find opportunities to gain work and work experience.
- 1 We own and manage properties in various locations around England and Wales, including East and West Midlands, the Northwest, Wales, and South Yorkshire.
- 1 We are:
 - a) a registered provider of social housing in England, registered with and regulated by the Regulator of Social Housing (the Regulator); and
 - b) a private residential landlord in Wales, registered with and licenced by Rent Smart Wales.
- 1 As we own and manage a limited number of properties across the UK, it is therefore necessary for us to prioritise applicants to ensure and fair and equitable allocation of our available

accommodation to those with more than just a need for quality housing, whilst prioritising those in greatest need.

- 1 We provide two different types of accommodation:
 - a) general needs housing: accommodation for individuals and families capable of living independently (General Needs)
 - b) supported housing: accommodation with tailored support for individuals with additional needs such as mental health issues, disabilities or recovery from homelessness (Supported Housing).
- 1 This policy sets out our approach to allocating and letting our General Needs and Supported Housing accommodation to further our aims, mission and values, for the benefit of our tenants, residents and service users (TRS).

2 Purpose & Scope

- 2.1 The purpose of this policy is to provide clear guidance to our colleagues to ensure that we meet all applicable legal and regulatory requirements in relation to the allocation and letting of our homes to sustain the best possible level of independent living for our customers.
- 2.2 In particular as a registered provider of social housing in England, we are required to comply with the Regulatory Framework set by the Regulator, including the Tenancy Standard and the Transparency, Influence and Accountability Standard which provides that we must:
 - a) allocate and let our homes in a fair and transparent way that takes the needs of tenants and prospective tenants into account
 - b) co-operate with local authorities strategic housing functions and assist local authorities to fulfil their duties to meet identified local housing need; including assisting local authorities to meet their homelessness duties and meeting obligations in nominations agreements;
 - c) seek to allocate homes that are designated, designed, or adapted to meet specific needs in a way that is compatible with the purpose of the housing;
 - d) develop and deliver services that seek to address under-occupation and overcrowding in their homes, which should be focused on the needs of tenants;
 - e) take action to prevent and tackle tenancy fraud;
 - f) have a fair, reasonable, simple and accessible appeals process for allocation decisions
 - g) record all lettings and sales as required by the Continuous Recording of Lettings (**CORE**) system
 - h) treat tenants and prospective tenants with fairness and respect
 - i) deliver fair and equitable outcomes for tenants and prospective tenants by:
 - i. using information and data to understand the diverse needs of tenants, including those arising from protected characteristics, language barriers and additional support needs;
 - ii. ensuring that our communication and information for tenants is clear and assessable, relevant, timely and appropriate to the diverse needs of tenants;
 - iii. ensure that our services are accessible and that the accessibility is publicised, including supporting tenants and prospective tenants to use our online services if required;
 - iv. allow tenants and prospective tenants to be supported by an advocate in interactions about our services.
 - v. ensure complaints are addressed fairly, effectively and promptly.

- 2 This policy sets out how we comply with the requirements of the Tenancy Standard and the Transparency, Influence and Accountability Standard and in addition sets out how our allocations and lettings:
 - a) make the best use of our available housing
 - b) assist to regenerate communities
 - c) ensure we allocate our homes to people who fall within our charitable aims and whose housing needs are not adequately serviced by the private sector
 - d) ensure that existing TRS and potential TRS can access accommodation with us
 - e) contribute to developing sustainable communities
 - f) are non-discriminatory and equitable
 - g) sustain the best possible level of independent living for our customers
 - h) minimise void loss in the interests of all applicants.
- 2 This policy applies to the allocation and letting of all of our housing stock and should be adhered to by all of our employees working within our Housing and Support Departments.
- 2 This policy does not:
 - a) apply to requests from tenants to mutually exchange their home with another social housing tenant. Any requests for a mutual exchange will be dealt with in accordance with our separate Mutual Exchange Policy and Procedure which should be referred to for details
 - b) cover circumstances where a tenant dies and the tenancy is assigned; someone inherits or takes over the tenancy or is granted a new tenancy. This is called “succession” which is dealt with in our separate Succession Policy which should be referred to for details
 - c) apply to any requests to transfer a tenancy to another person whilst the tenant is alive. This is known as assignment of the tenancy which is dealt with in accordance with our Assignment Policy which should be referred to for details.

3 Legal and Regulatory Framework

- 3 This policy has been developed to align with the following legislation and regulation in England and Wales, including:
 - a) Housing Act 1988
 - b) Housing Act 1996
 - c) Localism Act 2011
 - d) Equality Act 2010
 - e) Human Rights Act 1998
 - f) Welfare Reform Act 2012
 - g) Prevention of Social Housing Fraud Act 2013
 - h) Housing (Wales) Act 2014
 - i) Immigration Act 2014
 - j) Immigration Act 2016
 - k) Renting Homes (Wales) Act 2016
 - l) Data Protection Act 2018 and the UK General Data Protection Regulation (“GDPR”)
 - m) Social Housing (Regulation) Act 2023
 - n) English Government Guidance on Allocation of Accommodation
 - o) Welsh Government Code of Guidance on Allocation of Accommodation and Homelessness
 - p) The Regulator’s Consumer Standards including the Tenancy Standard and the Consumer Standards Code of Practice.

4 Related Policies and Procedures

4 This policy impacts on and is connected to most of our other housing management policies and procedures. The main policies and procedures relating to this policy are our:

- a) Allocations and lettings procedure
- b) Anti-Social Behaviour Policy and Procedure
- c) Appeals Policy and Procedure
- d) Arrears Policy and Procedure
- e) Bad Debt Policy
- f) Complaints Policy
- g) Confidentiality Policy
- h) Drugs Policy
- i) Equal Opportunities Policy
- j) Harassment Policy
- k) High Risk Offenders Policy
- l) Local Lettings Policy
- m) Lettings Standard Policy
- n) Mutual Exchange Policy and Procedure
- o) Pets Policy
- p) Privacy Policy
- q) Rent Setting Policy
- r) Rechargeable Repairs Procedure
- s) Risk Assessment Procedure
- t) Succession & Assignment Policy
- u) Tenancy and Licence Management Policy
- v) Transfer Procedure
- w) Void Policy and Procedure

5 Equality and Diversity

- 5 AHHA recognise that different people and communities may have specific needs which may require flexible approaches. We also appreciate that some groups or individuals may experience discrimination and disadvantage.
- 5 Our aim is to ensure that our policies and supporting procedures do not knowingly create an unfair disadvantage for anyone, directly or indirectly.
- 5 We will ensure that this policy is applied fairly and consistently to all our TRS's and applicants.
- 5 We will not directly or indirectly discriminate against any person or group of people on the grounds of any protected characteristic set out in the Equality Act 2010 and in accordance with our Equal Opportunities Policy, which should be referred to for details. We believe that everyone should be treated with dignity, respect and fairness, regardless of their characteristics.
- 5 We are committed to developing an equal and diverse culture where people are valued from all sections of society. We therefore oppose any form of discrimination in service delivery and employment practice. We aim to treat all customers fairly and we will look to tailor our policies, procedures and services to meet the needs of all our TRS'.
- 5 Where we identify a TRS who is vulnerable by reason of age, disability or illness, we will look to make reasonable adjustments to our services accordingly to meet the needs of that TRS. This may include altering the way we communicate with a TRS or adjusting the service we offer

to that TRS. Each case will be judged on its individual merits to avoid a one size fits all approach. We will monitor our services regularly to ensure we are meeting all our TRS needs and make any adjustments required to improve and enhance the service we deliver.

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6 Data Protection and Confidentiality

- 6 As the ‘controllers’ of any ‘personal data’ we hold about applicants and TRS’ we are committed to data protection and upholding applicant’s and TRS’ rights over their data by complying all relevant data protection laws including the Data Protection Act 2018 and the GDPR in the way set out in our Confidentiality Policy which should be referred to for details.

7 Statement on Fraud

- 7 AHHA is committed to ensuring its homes are occupied by those they have been let to and who are entitled to live in them and takes a pro-active approach to prevent and detect tenancy fraud. Tenancy fraud includes:
 - a) providing false information or withholding information to obtain an occupancy agreement
 - b) not occupying the property as the only or principal home
 - c) unlawfully sub-letting the property.
- 7 We will reduce the risk of tenancy fraud by:
 - a) verifying the identity of applicants and household members
 - b) confirming applicants’ occupation history
 - c) confirming the applicants’ property interests
- 7 To proactively manage the risk of tenancy fraud we will also:
 - a) carry out individual and neighbourhood wide tenancy audits to ensure the continued residency of applicants and household members and any changes to household members;
 - b) carry out intelligence-based tenancy audits using internal and external data;
 - c) conduct publicity campaigns to encourage reporting of tenancy fraud;
 - d) compare applicant and TRS data with external organisations to detect tenancy fraud;
 - e) work with partners to help and detect tenancy fraud.
- 7 Where investigations identify that a housing fraud has been committed, we will take appropriate and proportionate action which may include the following:
 - a) seeking possession of any property obtained, retained, or used fraudulently;
 - b) recovery of any monies obtained because of the fraud e.g., rent paid by occupiers to who the property is unlawfully sub-let;
 - c) supporting the relevant authorities to prosecute those who have obtained an occupancy agreement by fraud or sublet our homes when they do not have the right to do so;
 - d) support other victims of the fraud, for example a person who has unknowingly paid rent to a TRS who has unlawfully sub-let their home to them and sign post them to appropriate agencies.

8 How We Allocate Our Homes

- 8 We allocate and let our homes in the following ways:
 - a) via local authority nominations in areas where we have homes

- b) via our own housing register:
 - i. **for external applicants who**
 - apply to us directly; or
 - are referred to us through various agencies such as the Probation Service, Social Services, the Department of Health and Social Care and other social landlords
 - ii. **for existing tenants**
 - seeking to transfer to another AHHA property (including where an existing Supported Housing TRS is moving on from Supported Housing) (internal transfers); or
 - who needs to move urgently to address an immediate priority (a management move)
 - in exceptional circumstances, including to accommodate a business need (a direct offer)

- c) via direct marketing when all other allocations routes have been exhausted.

8 In addition, when allocating our properties we will comply with:

- a) any Local Lettings Plans agreed with our local authority partners which set out additional agreement about who can be housed and where to meet any specific local issues in that area (LLPs). Where LLPs are in operation these will take priority over our Allocations and Lettings Policy for that particular area or neighbourhood.
- b) our internal local letting procedures in force for each of our schemes/projects to reflect the aims and objectives of our schemes/projects and our Local Lettings Policy. Where local lettings procedures are in operation these will take priority over any eligibility criteria contained within this Policy for that particular scheme/project.

9 Local Authority Nominations

- 9 As a registered provider of social housing in England, we have a duty to co-operate with local authorities to provide reasonable assistance to them to meet their homelessness and allocation duties in the areas we operate by offering homes on request by local authorities.
- 9 We will therefore cooperate with local authorities in England to assist them to meet housing need and to accommodate people who are statutorily homeless and in priority need. We will do this by seeking to accommodate people who have registered with the local authority for housing and who have been nominated to us by the local authority.
- 9 A local authority is responsible for administering its own housing register. Applicants for housing apply directly to join the local authority's housing register and the local authority assess whether the applicant is eligible. Legislation sets out non qualifying households who are not eligible for the housing register or eligible for housing assistance.
- 9 We assist by offering properties on request by a local authority to applicants on its housing register in accordance with any nomination arrangements in place with local authorities through local authority or other partnership choice based letting schemes.
- 9 Applicants nominated to us by a local authority will still need to pass our eligibility and exclusion criteria set out in this Policy. When we receive a nomination, we will therefore check that the nominee is eligible to become an AHHA TRS (see paragraph 11 below).

9 We reserve the right to verify information concerning the nominee's identity, housing history and current circumstances to ensure that they are suitable for the home for which they have been nominated. Where nominees do not meet our criteria or the local authority does not provide the relevant information required to fully assess the nominee, we may refuse the nomination and explain our reasons for doing so to the local authority.

10 Our Housing Register Waiting List

- 1 To be considered for housing or rehousing with AHHA, all applicants, including external applicants and existing TRS need to apply to be included on our housing register waiting list if it is open. We will only accept applications to our waiting list for General Needs accommodation if the number of persons already on the waiting list are less than 2 times the number of properties managed by us to ensure that the General Needs waiting list is manageable.
- 1 Once added to the housing register waiting list, applicants, are categorised into applicant and accommodation type (i.e. external applicants, internal transfers, management moves, direct offers and General Needs or Supported Housing) and will be prioritised in the way set out below at paragraphs 16 and 17 below. We will also notify applicants that they have been added the housing register waiting list and provide details of how their application will be prioritised under this policy.
- 1 AHHA will update the housing register waiting list on a regular basis to ensure it remains up to date and accurately reflects the housing needs of applicants. This may involve:
 - a) regular contact with applicants to confirm continued interest and any changes in circumstances
 - b) removal of applicants who no longer qualify or fail to respond to review requests.
 - c) updating priority banding and/or points allocations based on new information received
 - d) ensuring efficient management of waiting lists and allocations processes.
- 1 Updates will include actions as listed in Monitoring, Review and Performance Information section of this policy.

External Applicants

- 1 External applicants (including referrals) must complete a housing application form to join our housing register waiting list which is available from AHHA's website: <https://www.adullam.org.uk/housing-support/how-to-access-our-services/> or by visiting one of AHHA's designated offices. Help with completing the application form will be made available to anyone who requests it.
- 1 If the application form is not suitable for the needs of the applicant, we will provide the information in an appropriate format or language. For example, this would apply to applicants with partial sight loss, hearing impairment, literacy or leaning difficulties.
- 1 Applications may be made by employees, former employees, contractors, board and/or trustee members and any of their close relatives, but such applicants will need to declare their status on the application form. In addition, such applicants must have no involvement in any decision relating to the application to join the housing register waiting list or any other decision under this policy.

- 1 Joint applications will be accepted from married couples, civil partners, co-habiting couples, same sex couples, family members, friends and brothers and sisters, who wish to live together. Joint applicants will only be admitted to our housing register waiting list where both joint applicant's meet our eligibility criteria set out at paragraph 11 below.
- 1 During the application process, applicants will be required to provide evidence to support their application to demonstrate they meet our eligibility criteria (see paragraph 11 below) and to provide evidence in response to any further queries we may have for all household members on the application.
- 1 We may also conduct a home visit to confirm information provided in the application form.
- 1 Applicants who are unable to provide the necessary evidence to us in the time specified will not be eligible to join the housing register waiting list.
- 1 If following assessment, an applicant can demonstrate they meet our eligibility criteria (see paragraph 11 below), they will be added to housing register waiting list.
- 1 Where we decline to add an applicant to our housing register waiting list, the reasons for the decision will be explained. We will also provide details of our appeals and complaints process; and signpost failed applicants to housing advice services.

Existing TRS'

- 1 Existing TRS' seeking rehousing by way of transfer, management move or direct offer, will be added to the housing register waiting list, subject to meeting the eligibility criteria at paragraphs 11 and 13 below (where applicable) on completion of the relevant paperwork in accordance with our allocations and lettings procedure which should be referred to for details.

11 Eligibility Criteria For External Applicants

- 1 To be eligible for AHHA accommodation all applicants must demonstrate that they can and will manage the responsibilities of a home including having the financial means to cover rent and all associated home running costs. We will consider each case on an individual basis and make every effort to resolve any possible ineligibility.

General Eligibility Criteria

- 1 To eligible for a home with us applicants must meet our general eligibility criteria:
 - a) be aged 18 or over (or over 16 in exceptional circumstances (see paragraph 11.3 below))
 - b) demonstrate a need for social housing based on assessment
 - c) meet immigration and residency requirements
 - d) have a local connection
 - e) meet our affordability criteria
 - f) have an identified support need which matches the support services we are able to provide in the accommodation and be willing to engage in support

16- And 17-Year-Olds

- a) Applicants aged 16 and 17 (minors) will only be eligible if they are: nominated or referred to us and have their housing and support needs assessed jointly

with other agencies who are working with us through commissioning processes to provide specific support

- b) single with no dependents
- c) in need of support to live independently

- 1 In addition, applicant who are minors must be either:
 - a) homeless or threatened with homelessness; or
 - b) living in an unsuitable environment with a demonstratable need to move; or
 - c) a care leaver owed a duty by the local authority.

Social Housing Need

- 1 To ensure that our homes are allocated to people who cannot afford accommodation in the private sector and to ensure our charitable aims and criteria are met, applicants may not qualify to join our housing register waiting list if they:
 - a) have available financial resources and/or household income to be able to rent or buy accommodation in the private sector
 - b) own a property in the UK or abroad.
- 1 We will however consider applications from homeowners who are unable to access housing in the private sector where they:
 - a) are in negative equity and/or possession proceedings are in place
 - b) have a medical condition or disability which required substantial adaption to their property which cannot be made in their current home or in the private sector and social housing is the only realistic option
 - c) have a special care need or require specialist support
 - d) are owed a duty by the local authority, due to for example fleeing domestic abuse. We will however need to see that steps are in place to remove their interests from their existing property.
- 1 We will therefore carry out a financial assessment to assess income, savings and equity on a case-by-case basis, taking individual circumstances into account when deciding whether an applicant has the ability to solve their own housing need.

Immigration Status

- 1 Under the Immigration Act 2014 landlords:
 - a) must not authorise an adult to occupy premises under a residential occupancy agreement if the adult is disqualified as a result of their immigration status
 - b) are required to check the immigration status of prospective residents and other adult occupiers to ascertain whether they have a right to be in the UK before granting an occupancy agreement (i.e. carry out a “right to rent check”). The right to rent check for any potential resident and all proposed adult occupiers must be established prior to granting the occupancy agreement.
- 1 Under the Immigration Act 2014, we do not need to carry out right to rent checks on persons allocated through any nominations agreements with a local authority as the local authority will have already conducted appropriate immigration checks prior to nominating the applicant under its statutory duties.

- 1 Right to rent checks will however be carried out by us for the applicant and all adults who will be living with the applicant before we add the applicant to our housing register waiting list, where the applicant is not nominated to us by a local authority. We will carry out right to rent checks in accordance with government requirements and guidelines.

Local Connection

- 1 Applicants will be required to have a local connection to the local authority area they want to live in.
- 1 An applicant will be considered to have a local connection if they:
 - a) currently live or were born in the area
 - b) are employed in the area
 - c) have close family in the area
 - d) have special circumstances
 - e) are leaving care.
- 1 If we have a home that attracts no demand from those with a local connection, we may however offer the home to someone without a local connection.

Affordability Criteria

- 1 Applicants must be able to demonstrate that they can sustain an occupancy agreement with us, and that they can afford to pay the rent and any service charge.
- 1 Where there is no realistic prospect that that applicant would be able to afford the rent and any service charge or have access to sufficient benefits, they will not be eligible for housing with us.
- 1 We will therefore carry out an affordability assessment before we add the applicant to our housing register waiting list.
- 1 In addition, prior to an offer of accommodation, we will conduct a further affordability assessment to ensure that they can afford the rent and service charge for the property they are being considered for.

Support Needs

- 1 To be eligible for Supported Housing with us applicants must:
 - a) have an identified support need which matches the support services we are able to provide
 - b) be willing to engage in a support program.
- 1 In addition, applicants who have support needs may be declined access to General Needs accommodation.
- 1 An assessment will be completed with applicants regarding their support requirements and any risks they present. Where necessary a support plan and risk assessment will be agreed with the applicant. Where an assessment is made that establishes that an occupancy agreement may be unsustainable without support and the applicant declines support, or appropriate support cannot be provided because for example, the applicant needs a higher

level of support than we or another provider can reasonably facilitate, an applicant may not be eligible to join our housing register waiting list.

Exclusions And Other Criteria

- 1 Some applicants who meet our general eligibility criteria may be ineligible or excluded from joining our housing register waiting list for other reasons. These reasons may include where:
 - a) the applicant has provided false or misleading information in relation to their application
 - b) the applicant has any housing related arrears owed to AHHA or another landlord, unless they are taking reasonable steps to repay the debt
 - c) the applicant has breached a previous occupancy agreement for non-payment of rent
 - d) the applicant has been previously evicted due to a breach of their occupancy agreement, including anti-social behaviour, harassment, domestic abuse, nonpayment of rent or charges, tenancy fraud or misrepresentation
 - e) the applicant or a member of the applicant's household has caused serious anti-social behaviour or harassment (e.g. has been evicted or convicted due to anti-social behaviour or harassment)
 - f) the applicant is currently serving a custodial sentence
 - g) the applicant has an unspent conviction convicted of a serious criminal offence, where the crime make them unsuitable to be a TRS and there is no evidence that their behaviour has moderated (we do not automatically consider any ineligible for housing if they have previous convictions but where we are concerned that an applicant will pose a risk to themselves, our staff and contractors, their home or to the wider community, then they may be deemed ineligible for housing)
 - h) the applicant has committed other occupancy agreement breaches or behaviours likely to cause an occupancy breach, this includes the applicant not looking after their current home
 - i) the applicant does not have mental capacity to enter into an occupancy agreement and the applicant does not have a lasting power or attorney (Property) in place or a Court of Protection Deputy appointed
 - j) the applicant cannot demonstrate that they currently have the appropriate skills in place to be able to manage an occupancy agreement (with support where applicable)
 - k) we are satisfied that the applicant or a member of the applicant's household is guilty of unacceptable behaviour serious enough to make them unsuitable to be a TRS. We will consider the following:
 - i. if there is sufficient evidence that on the balance of probabilities (i.e. is more likely than not) that the behaviour was serious enough to have entitled a social landlord to recover a possession order; and
 - ii. whether it is reasonable to refuse the application based on the information provided taking into account the impact would have on the wider community and our employees and contractors.

12 Assessing Eligibility For External Applicants

- 1 All applicants will be required to undergo a thorough assessment process to determine their eligibility to be added to our housing register waiting list. This may include:
 - a) verification of the applicant's identification documents. In all cases, a robust process will be followed to ensure the applicant's identity which includes background and photographic identification checks and collecting and verifying the applicant's national

insurance number. In all cases, a robust process will be followed to ensure the applicant's identity which includes background and photographic identification checks.

- b) checking the applicant's and any household members over 18 have a right to rent if local authority checks have not been completed.
- c) checking the applicant's economic/financial status (including any benefit restrictions that may be in place) to establish entitlement to social housing and to ensure they can afford to rent a home from us. This may involve obtaining bank statements, other forms of evidence of income and credit checks. Credit checks may be carried out to gather information about an applicant's current financial circumstances and to highlight any unmanaged debt that may impact an occupancy agreement being sustained. Equity and savings will be assessed on a case-by-case basis and will be used to judge whether someone has the ability using their own equity or savings to solve their housing needs;
- d) establishing the applicant's housing and support needs so that the applicant can be matched with appropriate housing and support services, including verifying mobility requirements for adapted homes, family composition for property size and support for health conditions or disabilities. Where the applicant has applied for Supported Housing, a support needs risk assessment will be carried out;
- e) checking whether the applicant has a local connection to the local authority area they want to live in based on the criteria set out above at paragraph 11;
- f) obtaining references from landlords for all former occupancy agreements held by an applicant for the previous five years (if applicable);
- g) any other factors which may determine how easy it is to sustain their occupancy agreement;
- h) visiting the applicant's existing home (if applicable);
- i) obtaining criminal background checks (where appropriate). All applicant's will be asked to disclose any history of unspent convictions. Where an applicant has been being convicted of a serious criminal offence, we will carry out a risk assessment and to assess whether it is safe and appropriate to accommodate them.

- 1 Following assessment, we reserve the right to reject an application where the applicant is deemed ineligible to be added to our housing register waiting list.
- 1 We will not however adopt a blanket approach to applications and each application will be assessed based on the applicant's individual circumstances and our decision will be based on its own merits. In exceptional circumstances we may decide to add an applicant to our housing register waiting list where they do not meet the eligibility criteria above with the approval of the National Housing Manager.
- 1 Where an applicant's situation changes, applicants must report the change of circumstances to us which may require the applicant to be reassessed with further evidence.

13 Eligibility Criteria And Assessment For Existing TRS

Transfers

- 1 Where the Applicant is an existing TRS, who is being considered for a move internally, the TRS will not be eligible to be added to our housing register waiting list for a transfer unless they can evidence that their existing accommodation is unsuitable for their needs. Accommodation will not usually be suitable for TRS needs where:

- a) the accommodation is under occupied or overcrowded
- b) the accommodation is not affordable and an alternative would be more appropriate
- c) the TRS lives too far from their work or education to reasonably commute
- d) the TRS needs to be closer to provide care or receive care
- e) the accommodation is Supported Housing and the TRS is ready to move to General Needs accommodation
- f) there is medical need, for example where:
- g) the TRS is unable to return home from hospital due to it not being suitable
- h) the TRS is unable to gain access to or from their home due to a medical condition/disability
- i) the TRS is unable to leave their home unassisted due to a medical condition or disability
- j) the TRS' home requires adaptations but this is not reasonable or possible.

- 1 In addition, TRS will may only be considered eligible for a transfer to another AHHA property if following assessment, they:
- a) have no outstanding rent, or housing related debts
 - b) are not subject to any current or impending legal action for rent arrears, anti-social behaviour or any other reason
 - c) have maintained their existing property in good condition
 - d) have complied with the terms of their existing occupancy agreement
 - e) continue to meet our eligibility criteria at paragraph 11 above.
- 1 We will not however adopt a blanket approach to applications to transfers and each application will be assessed based on the applicant's individual circumstances and our decision will be based on its own merits. In exceptional circumstances we may decide to add the transfer applicant to our housing register waiting list where they do not meet the eligibility criteria above with the approval of the local manager.

Assessment Of Transfer TRS Applicants

- 1 Existing TRS will be assessed according to the same criteria as external applicants as set out above at paragraph 11 (where applicable). In addition, further checks will be required to confirm that the existing TRS has fully adhered to the terms of their existing occupancy agreement. Additional checks will include the following:
- a) an assessment of the condition of their existing home. Failure to meet AHHA standards will result in any application to transfer being declined until such time as works have been undertaken to bring the property up to the required standard
 - b) an assessment of whether there has been a breach of any other occupancy agreement condition. Failure to meet the obligations set out in our occupancy agreements will result in any application to transfer being declined until such time as the breaches have been rectified.

Management Moves

- 1 We recognise that there are occasions when a TRS will need to move urgently in exceptional circumstances. Circumstances that require a management move include but are not limited to when:
- a) there is a risk to life or public safety

- b) there is a threat or actual violence, harm, abuse, harassment, serious nuisance or trauma. and there an imminent risk to the TRS or a member of their household if they remain at the property
- c) the existing home is uninhabitable
- d) the existing home has been marked for demolition
- e) the move would significantly improve the wellbeing of the household and/or the community around them
- f) assisting the local authority under Multi Agency Public Protection Arrangements
- g) supporting a recommendation from a Multi-Agency Risk Assessment Conference
- h) moving a TRS on a temporary basis to alternative accommodation because of a crisis e.g. fire or flood or where the current home is undergoing major repair or regeneration that cannot be reasonably completed while the TRS is in occupation (a decant). In these cases, the TRS must continue to pay occupancy charges for their original home and must return to their original home once the works are complete
- i) moving vulnerable witnesses/victims in anti-social behaviour / hate crime cases
- j) there is an anti-social behaviour case involving two TRS's and it has not been possible to determine who the victim is
- k) it is in AHHA's interests to move a TRS e.g., where the property is to be sold or used for another purpose
- l) a joint tenancy is terminated one party may be allocated the property if it is suitable for their housing needs
- m) the tenant has died and the occupant has a legal right to succeed to the tenancy but is prepared to accept an offer of a property that is more suitable to their requirements
- n) there is an unauthorised occupant where it would be appropriate for us to rehouse
- o) where a TRS is unable to remain in their current accommodation due to violence, abuse, harassment, serious nuisance, or trauma;
- p) where a TRS is involved in a neighbour dispute and it is unlikely that enforcement action is feasible / will be successful and a move to alternative accommodation is the most appropriate solution;
- q) where a high demand home will be released as a result of the move.

1 Each potential management move will be considered and assessed on its own merits and will require supporting evidence. A TRS being considered for a management move will only be added to the housing register waiting list with the approval of the Operational Manager.

Direct Offers

- 1 Direct offers may be made in exceptional circumstances to accommodate business needs created by other policies and procedures. The situations in which Direct Offer may be made include but are not limited to:
- a) where a TRS is left in a property that they are not eligible for following a relationship breakdown, if the TRS is eligible to be added to our housing register waiting list following assessment in accordance with paragraphs 11 and 12 of this policy. If a property does not come available within 3-months we commence legal action to recover possession of the property;
 - b) where one joint tenant has ended a joint tenancy which has ended the tenancy for both tenants if the remaining TRS is eligible to be added to our housing register waiting list following assessment in accordance with this paragraphs x and x of this policy. In this case, the remaining TRS may be made a direct offer of the property or added to the housing register waiting list for another property
 - c) where a TRS has been evicted for rent arrears but has paid the debt in full by the end of the following week after the eviction (or such later period that may be

agreed with the approval of the Operational Manager. The TRS would only be eligible for a direct offer of the property they were evicted from and must not be ineligible from being added to our housing register waiting list in accordance with paragraph 11 above, for any other reasons e.g., anti-social behaviour. In addition, a TRS will only to be considered for a direct offer under this policy once. If they are evicted a second time, they would not be eligible for a further direct offer.

- 1 Each potential direct offer will be considered and assessed on its own merits and will require supporting evidence. A TRS considered for a direct offer will only be added to the housing register waiting list with the approval of the Operational Manager.

14 Allocations Through Direct Marketing

- 1 When all other allocate options have been exhausted, we reserve the right to advertise our available properties through our website or through an internet or locally based letting service direct to the public where:
 - a) the local authority is unable to provide a nomination for a property
 - b) we are unable to allocate a property to someone on our housing register waiting list.
- 1 We will make it clear in all of our advertisements the general nature of who we may let our properties to, to comply with our eligibility criteria and any LLPs and local lettings procedures for our schemes.
- 1 All direct applicants will be subject to the same eligibility criteria set out at paragraph 11 above and we will offer accommodation on a first come first serve basis.
- 1 Existing TRS will be able to apply for housing via direct marketing and they will be prioritised in the way set out at paragraphs 16 and 17 below. When there are multiple applicants for a property within the same priority, we will offer accommodation based on the date the expression of interest was received.
- 1 If an existing TRS applies for housing through the direct marketing route, we will prioritise them over new applicants.

15 Allocation Of Properties Based On Household Need

- 1 Our primary client group is single people and most of our Supported Housing is only suitable for singles or couples. In addition, we do not provide accommodation for large families; however, we do have several units which are suitable for those who have caring responsibilities for children.
- 1 When allocating our homes we will:
 - a) consider any requirements set out in any nomination agreements with local authorities and any choice-based lettings arrangements; and
 - b) ensure that our homes are not overcrowded under part X of the Housing Act 1985 under the Housing Health and Safety Rating System (HHSRS).
- 1 In addition, as AHHA aims to make the best use of its available stock when providing accommodation to applicant's meeting its eligibility criteria, we will apply rules used by the government in England and Wales when calculating what size home a household is eligible for in order to prevent overcrowding or under occupation. This is also to ensure the affordability

of any offer made in terms of size entitlement and qualification for Housing Benefit and the housing costs element of Universal Credit.

- 1 In particular guidance issued by the government in England and Wales for local authorities recommend the use of the bedroom standard “bedroom standard” to assess the number of bedrooms needed by applicants of social housing.
- 1 Under the bedroom standard a separate bedroom should be allocated to each:
 - a) married or cohabiting couple
 - b) adult aged 21 years or more
 - c) pair of adolescents aged 10-20 years of the same sex
 - d) pair of children aged under 10 years regardless of sex.
- 1 We will comply with the requirements of the bedroom standard for all allocations under this policy and the size of any home offered to an applicant will be based on the number of persons in the household, their age sex and relationship to each to each other.
- 1 We may also permit under occupation and allocate additional bedrooms in exceptional cases including but not limited to where:
 - a) there are specific needs such as medical requirements, live in carers or where there are shared child custody arrangements
 - b) we have agreed to do so under an LLP agreed with our local authority partners; or
 - c) a property is difficult to let.
- 1 In these exceptional cases, we will ensure that the applicant has the financial capacity to sustain the occupancy agreement and that that they understand the potential reduction in housing benefit/universal credit that may apply.
- 1 In addition, the following restrictions will be applied to all of our lettings:

Local Lettings Plans

- 1 LLPs agreed with our local authority partners may restrict who can live at a particular scheme, street or neighbourhood to meet any specific local issues in that area including:
 - a) supporting community and cohesion
 - b) addressing anti-social behaviour or crime concerns
 - c) prioritising key workers or those with local employment ties
 - d) facilitating mixed income or intergenerational communities
 - e) addressing under occupation and overcrowding issues

Internal Local Lettings Procedures

- 1 Each AHHA project or scheme will have a written Local Lettings Procedure that reflects the aims and objectives of the scheme/project. The Local Lettings Procedure will be contained within the TRS Handbook and/or Project Leaflet for each scheme/project and will be available for inspection by applicants and applicable agencies.
- 1 Each Local Lettings Procedure will clearly state the criteria for acceptance into the scheme/project and any criteria when TRS’s will be required to transfer to move-on accommodation. Within the boundaries of each scheme/project’s acceptance criteria, no

applicant will be treated less favourably based on age, race, gender, religion, disability, sexual orientation, or any other protected characteristic under the Equality Act 2010.

- 1 The local letting criteria that may apply under our Local Lettings Procedures for our schemes/projects include, but are not limited to:
 - age restrictions
 - restrictions geared towards encouraging applicants who work or volunteer to live in an area where for example there may be an area, or street with high numbers of working age households not in work
 - restrictions on lettings to vulnerable households where there are already a concentration of supported tenants/residents in a street or block
 - lettings to childless households where there are high concentrations of children and young people living on a specific estate, street or block
 - disregarding household type or property matching rules to allow for example under-occupation to reduce child density or to account for future family growth.

Adapted and accessible properties

- 1 Where our properties have been built or adapted to be accessible to people with disabilities or mobility needs (including bungalows and level access accommodation), we will allocate these homes to applicants with similar needs where possible to make the best use of these homes.

Age restricted properties

- 1 Some AHHA properties may be restricted to certain age groups in accordance with the terms of any funding agreements for the provision of the particular accommodation and any support provided at the accommodation. This is usually because the properties are specifically designed to meet the needs of that age group or have been adapted for that age group.

Planning requirements

- 1 Some AHHA properties may be built with planning permission that had conditions attached to it, which restrict the circumstances in which the properties may be let and to whom. Any such restrictions will be scheme/project specific and will override any aspect of this policy for that particular scheme/project.

Pets

- 15.17 Some AHHA accommodation may have restrictions on pet ownership particularly where the property is Supported Housing or has shared communal areas, in accordance with our Pets Policy which should be referred to for details. Restrictions may include:
 - no large pets allowed in certain high density or Supported Housing schemes unless the pet is an assistance animal to support a disability or other medical need;
 - limits on the number or type of pets permitted;
 - requirements for responsible pet ownership, including vaccinations and microchipping.

- 1 Applicants will be informed of any pet restrictions when an offer of accommodation is made.

16 How We Prioritise Applications For Supported Housing

- 1 We will prioritise applicants for Supported Housing based on a banding system reflecting an assessment of housing and support needs which will also take into account time on the housing register waiting list and where applicant requires a management move, the severity of the need for a management move).
- 1 There are 4 priority bands. Applicants are placed in an appropriate band accordingly to an assessment of their housing and support needs:
 - a) Band A:** urgent housing and high support need (e.g., statutory homelessness, severe medical conditions, fleeing domestic abuse, individuals leaving hospital or institutional care with critical support requirements)
 - b) Band B:** High housing and moderate support need (e.g., individuals in temporary accommodation with ongoing support needs, severe overcrowding combined with support needs, people moving on from high level support requirements)
 - c) Band C:** Moderate housing need with some support requirements (e.g., those in unstable housing situations with minor support needs, people needing low-level ongoing support to maintain independence)
 - d) Band D:** Low housing need and minimal or no support requirement (e.g., those seeking supported housing but able to live independently with minimal assistance).
- 1 We will prioritise applicants with the highest combined housing and support needs to ensure the most vulnerable applicants receive appropriate accommodation and assistance.
- 1 Where applicant's circumstances change and supporting evidence is provided, we may reassess the applicant's application and place the applicant in a higher or lower band as required.

17 How We Prioritise Applications For General Needs Accommodation

- 1 For General Needs Housing, we will use a points based system to ensure fair prioritisation for accommodation. Points will be awarded based on factors including but not limited to:
 - a) Housing need:** points allocated for homelessness, overcrowding or poor housing conditions
 - b) Medical or welfare need:** points awarded based on the severity of the medical conditions impacted by current housing
 - c) Local connection:** additional points for applicants with a strong local connection through residency, employment, or family support
 - d) Under occupation and overcrowding:** points awarded to households living in overcrowded accommodation or under occupying social housing and willing to downsize
 - e) Employment or Community Contribution:** additional points may be added for applicants who are employed or contribute to the community through voluntary work or caregiving
 - f) Management Moves:** points will awarded depending on the severity and urgency of the need for a management move.
- 1 Applicants with the highest points total will be given priority when allocations are made.

- 1 Where applicant's circumstances change and supporting evidence is provided, we may reassess the applicant's application and adjust the applicant's points award as required.

18 Property Matching And Offers

- 1 Applicants will be matched to suitable properties based on need, support requirements and property availability.
- 1 Before an offer of accommodation is confirmed, applicants will be subject to additional pre-offer assessments which may include:
 - a) carrying out additional affordability checks: to ensure that the applicant can reasonably afford the rent and associated costs for the property they are being considered for based on their income, benefits and expenditure. As applicant's will usually be required to pay a minimum of one month's rent in advance prior to signing an occupancy agreement with us, our assessment will include checks to ensure that the applicant has the necessary funds in place. Where this would cause significant financial hardship for the applicant, alternative arrangements may be considered on a case-by-case basis
 - b) renewing right to rent checks
 - c) support needs verification to confirm that the necessary support services can be provided or arranged to meet the applicant's needs
 - d) where the applicant is a minor and is to be occupying accommodation offered under a tenancy agreement, ensuring that the minor has trustee in place (such as a parent, legal guardian, social worker or relative) to countersign the tenancy agreement and hold the benefit of the tenancy in trust until the minor reaches 18 years of age. This is because a minor cannot hold a legal interest in land. We will not enter into a tenancy without a trustee in place, because otherwise we would be held to be the trustee by default, which would prevent us from regaining possession of the property, as this would be a breach of trust
 - e) where the applicant is an employee, former employees, contractors, board and/or trustee members and any of their close relatives, the offer must be approved and signed off by the [who]
 - f) ensuring that applicants understand their housing rights and responsibilities if they accept of accommodation with us. This will include providing applicants with information on their rights and obligations under the terms of their proposed occupancy agreement.
- 1 Failure to meet these checks may result in the withdrawal of the offer.
- 1 Offers will be made in accordance with the banding system for Supported Housing and the points-based system for General Needs as set out at paragraphs x and x above.
- 1 Applicants will receive a formal offer of accommodation detailed the property type, location and occupancy agreement terms and conditions.
- 1 Offers must be responded to by the applicant within [insert] working days.
- 1 External applicants and transfer applicants who refuse 2 reasonable offers of without valid reasons may have their application reassessed which may result in being moved to a lower priority band or a reduction in points awarded. In cases where a refusal is due to medical or social reasons, further review will be undertaken to determine appropriate next steps.

- 1 Due to the limited number of properties we have, where an external or transfer applicant refuses a 3rd reasonable offer, they will be removed from the housing register waiting list.
- 1 Where approval has been granted for a management move or a direct offer, we will make one reasonable offer of a suitable property to a TRS. Where the offer is refused, we will remove the application from the housing register waiting list.
- 1 Where we remove an applicant from our housing register waiting list, the reasons for the decision will be explained. We will also provide details of our appeals and complaints process; and signpost failed applicants to housing advice services.

19 Type Of Occupancy Agreement To Be Offered

- 1 Our Tenure Policy sets out how we have decided what occupancy agreements to use in what circumstances and should be referred to for details.

20 Rent Setting For New Lettings

- a) Rents for new lettings will be set in accordance with our [Rent Setting Policy] and will: comply with the Regulatory Standards for Social Housing in England, ensuring affordability and compliance with government rent-setting guidelines;
 - b) reflect local housing market conditions, ensuring social rents remain accessible to those in need;
 - c) reflect the type of occupancy agreement and property, including whether the property is let at social rent, affordable rent, or intermediate rent levels.
- 2 Applicants will be informed of the rent level and any associated service charges before accepting an occupancy agreement, ensuring affordability is taken into consideration.

21 Applicant's Right Of Appeal

- 2 If an applicant or TRS wishes to appeal any decision made in accordance with this policy, they can do so in writing by email or letter. Any appeal must be made within 21 calendar days of the applicant or TRS being notified of our decision.
- 2 The appeal must set out why the applicant or TRS feels the decision is not right.
- 2 A 'Review Officer' who was not involved in the original decision will deal with the appeal within 14 days of the request. All decisions following reviews will be notified to the applicant in writing giving the reasons for the decision. The decision letter will be sent out within 28 days of the original request.

22 Discretionary Powers

- 2 The Policy cannot cover every eventuality. In exceptional circumstances, the Regional and / or National Manager has discretionary power to make allocations decisions by for example awarding additional priority and approving offers of housing, taking into consideration all factors relevant to housing and social needs.

23 Standard Of Accommodation

- 2 All properties allocated under this policy will meet the required standards for social housing, ensuring that they are:
 - a) safe, secure and free from hazards
 - b) in a good state of repair, with equipment and installations in working order

- c) compliant with the Decent Homes Standard and other relevant housing legislation and regulations
- d) suitable for the needs of the applicant, including adaptations where necessary for medical or mobility requirements
- e) clean and ready for occupation at the time of letting.

24 Lettings Procedures

- 2 The allocations and lettings procedures explain in further detail the standards that the letting process must comply with and should be referred to for further details. These are designed to ensure the efficiency and fairness of the lettings process and provide timescales and detail into the lettings processes within AHHA.

25 Minimising Voids

- 2 As reducing void times helps to maximise housing availability and sustain rental income, ensuring resources are effectively managed, AHHA will implement measures to minimise void periods between occupation of its properties including:
 - a) streamlining its allocation and lettings processes to ensure swift turnaround times
 - b) carrying out pre-letting checks efficiently to reduce delays
 - c) conducting necessary repairs and maintenance to its void properties promptly
 - d) ensuring effective communication with prospective TRS to reduce refusals and withdrawals.

26 Monitoring, Review & Performance Information

- 2 Operational and Board Trustees ensure that there is in place an Allocations and Lettings policy which complies with current regulations, guidance, and good practice and to monitor compliance with the policy.
- 2 AHHA will monitor enquiries, applications, lettings, and departures to ensure fair access to services and that the lettings policy remains relevant and non-discriminatory. All projects and schemes will:
 - a) have a written Procedure outlining its Lettings Procedures.
 - b) have Project Information Leaflets.
 - c) record of all selection decisions.
 - d) record all lettings in the CORE lettings system
 - e) enter departures on the database.
 - f) complete the Supporting People Client Record forms (where appropriate).
- 2 Locality Managers are to manage the implementation of the policy and procedures on a day-to-day basis, advising all employees as required on specific matters.
- 2 Employees are to ensure they have read and understood the policy and procedures, and to implement them as required during their work.
- 2 The policy will be reviewed no later than three years from the effective date, or sooner:
 - a) to incorporate legislative, regulatory or best practice developments
 - b) in response to changes in other AHHA policies that impact on the Allocation and Lettings Policy
 - c) where there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations.

- 2 Relevant key performance information will be collated and reported to Board Trustees assigned to review the Allocation and Lettings Policy.
- 2 Every housing application showing as active will be reviewed at least once a year, to check whether individual circumstances or choices have changed. In circumstances where AHHA fails to contact the applicant the applicant can be removed from the register.
- 2 To identify the needs of our customers the application form will have specific questions relating to vulnerability, ethnic origin, sexual orientation, disabilities, and other relevant criteria. This information will be used to monitor the impact of the policy on minority and specific needs groups and to make such amendments, as may be required, to ensure no group is disadvantaged by the policy.

27 CORE (Continuous Recording of Lettings)

- 2 AHHA meets all CORE requirements and will use this data to monitor and analyse our lettings performance.

28 Nominating A Representative

- 2 AHHA encourage applicants and TRS who want to nominate a representative to act on their behalf in interactions us to follow AHHA's [insert name] Procedure which is available on AHHA's website or from AHHA's Offices.

29 Impact Assessment

- 2 AHHA will continually monitor the impact of our Allocation and Lettings Policy and announce any outcomes. Any outlining outcomes of the Impact Assessments will be of benefit and improvements made to services.

30 Complaints

- 3 AHHA will work with TRS Champions and/or service panels to review the effectiveness of our allocations and lettings policy and procedures. Further TRS satisfaction about our allocation and lettings process will also be collected through surveys to identify trends and any opportunities for improvement.
- 3 Any applicant who is unhappy with the service with which they have been provided by AHHA may complain. It is best for everyone if complaints are dealt with as quickly as possible. Applicants should contact the office or individual they usually deal with first who will try to solve the problem quickly.
- 3 If a complaint is not resolved at an informal level the applicant may make a formal complaint. A copy of AHHA's Complaints Policy, including details of how to complain, is available on AHHA's website or from AHHA's Offices.