

Paragon Asra Housing Limited

PA Housing Allocations Policy

October 2021

Owning manager

Richard Clark, Lettings and Home Moves
Manager

Department

Housing Services

Approved by

Policy Review Group

Next review date

October 2023

Contents

	Page	
1	Introduction	3
2	Objectives	3
3	Definitions	4
4	Key points of policy	4
5	Wider Initiatives	9
6	Other Client Groups / Access Routes	10
7	Compliance	12
8	Training	13
9	Monitoring and reporting	13
10	Legislation	13
11	Linked policies	14
12	Appendices	15-17

Paragon Asra Housing Limited (PA Housing) is committed to equality and diversity. This policy has considered the Equality Act 2010 and its protected characteristics which are: race, gender, gender reassignment, disability, religion or belief, sexual orientation, age, marriage, civil marriage and partnership, and pregnancy and maternity explicitly.

We will make sure that all of our communication is fully accessible and to achieve this if a policy or document needs to be available in other formats, we will provide them.

AUDIT LOG

Date of Change	Who updated	Details of the change
<p>05.06.17</p> <p>15.06.17</p> <p>28.06.17</p>	<p>Anna Henderson</p> <p>Anna Henderson</p> <p>Anna Henderson</p>	<p>Initial Draft of policy written</p> <p>Amendments following feedback from Thomas Jackson</p> <p>Amendments following feedback from Tenancy Solutions Team</p>
<p>22.02.18</p>	<p>Thomas Jackson</p>	<p>Section 6 – Management Transfer added and wording detailing our approach to Management Transfers detailed within this policy as an alternative option to having a separate policy for these.</p> <p>4.7 – Bedroom Matrix, added option for either single or couples with children to be considered for 2 bedroom properties for both Bede Island and Case House. Also further clarification provided around one bedrooms for single/couples.</p>
<p>27.09.19</p>	<p>Tehmima Valakhiya, Housing Operations</p> <p>Richard Clark, HomeMoves</p>	<p>Interim review completed:</p> <p>Spelling & grammar errors corrected.</p> <p>Section 4:</p> <ul style="list-style-type: none"> - ‘Under 35s’ section removed as this no longer applies. - Reference to specific agency names removed. <p>Section 10 - Update of legislation that has been considered</p> <p>Section 11 – Update of linked policies</p> <p>Appendix 2 – Sub regional variations sections amended to read consistently</p>
	<p>Richard Clark</p> <p>Lettings and HomeMoves</p>	<p>Review Completed</p> <p>Section 1.5 – Removal of mention of fixed term tenancies.</p> <p>Section 4.1- Removal of reference to Executive Director of Operations and replaced with Assistant Director of Housing</p> <p>Section 4.5- Change in wording for direct applications</p> <p>Section 4.10- Removal of reference to midlands transfer arrangements.</p>

		Section 6.3 – Full review and rewording of management transfer criteria.

1 Introduction

- 1.1** PA Housing is committed to the letting of properties in a fair and transparent way. We have a duty to assist Local Authorities in the fulfillment of their legislative requirements and undertake to support our existing residents who are in housing need under the governance of this policy.
- 1.2** Our ability to house people is limited by the number of vacancies in our stock portfolio, and the size, type and location of these properties. There are marked differences in supply and demand between the key sub-regions of the Midlands, London, and the South East and therefore some sub-regional variations apply to the banding scheme and the access routes for applicants coming into our homes.
- 1.3** Far more people, both on Local Authority housing registers and our existing customers, are in housing need than there will be properties available. Therefore, it will not be possible to help all applicants. Only existing customers with an identified housing need will be able to apply to transfer, all others will need to look to mutual exchange in order to move.
- 1.4** This policy covers allocations to general needs housing, independent living for older people, key worker housing and some supported housing where allocation is not made via a professional's assessment panel.
- 1.5** This policy does not cover; the transfer of tenancies made by any appropriate Court Order; the letting of properties in supported housing schemes managed by others on behalf of PA Housing; lettings made in specifically designated temporary accommodation, the decanting of existing residents, or residents mutually exchanging their tenancies.

2 Objectives

2.1 PA Housing seeks to:

- ❖ Allocate rental properties to those in greatest housing need whilst promoting the choices and participation of applicants in this process
- ❖ Treat applicants fairly and equally regardless of where they live or who they are
- ❖ Develop mutually beneficial close working relationships with Local Authorities – to support their duties and to maximize the efficiency of any nominations process. We will also seek to strengthen our development potential as a preferred provider of new homes
- ❖ Meet the needs of local communities and support their ongoing engagement with our services
- ❖ Achieve stable and sustainable tenancies
- ❖ Be agile enough to offer a flexible approach at local level; using our housing stock in the most efficient way, through differing tenures, and differing contractual relationships with Local Authority partners in terms of nominations agreements and use of local lettings plans.
- ❖ Rise to the challenges posed by welfare reform

- ❖ Provide a customer focused service including clear and easy to understand information, regular policy review and the continuous improvement of our processes and systems
- 2.2 We will use this policy to ensure consistency in our approach to any decision making or determination regarding an allocation. We will ensure that this is compliant with all relevant government legislation and statutory guidance.

3 **Definitions**

- 3.1 **Choice Based Lettings** – The method used to allocate homes by advertising available properties to eligible applicants, and then shortlisting those interested by their relative priority. This gives applicants’ choice about the type of property and area where they want to live.
- 3.2 **Nominations Agreement** – PA Housing maintains a nominations agreement in each local authority area of operation. The agreement sets out the minimum percentage of available vacancies that the authority would be able to nominate applicants from its own housing register to, and how they will do this. These agreements require at least 75% of available homes in London and the South East sub-regions, and typically 50% of available homes in the Midlands to be offered to the relevant Local Authorities for such nominations. At limited sites / schemes 100% nominations apply.
- 3.3 **‘Difficult to Let’ unit of accommodation** – On occasion a property may be refused by more than 3 consecutive nominees, or they may be no suitable applicants currently matched to the property profile (for example in the case of disabled adapted properties). Properties in certain low demand locations or estates with high turnover may also be classified as such. If this is the case external advertising to private or other social agencies may be considered.
- 3.4 **Sub-regions** – PA Housing owns properties in many boroughs, divided roughly as per the table included as Appendix 1. Where referenced, sub-regional variations apply accordingly.

4 **Key points of Policy**

4.1 **Eligibility –**

- ❖ PA Housing will only offer tenancies to 16-18-year old’s in exceptional circumstances.
- ❖ In all cases where a nomination is provided by a Local Authority all appropriate checks to ensure that the nominated household has the Right to Rent in the UK will be carried out by that authority. Where any applicants apply directly to PA Housing, we will ensure that this legal standard is met.
- ❖ Where local authority partners have set thresholds for earned applicant income, savings and/or asset value, PA Housing will adopt these for transferring households. Households exceeding these thresholds will be deemed to have sufficient resources to meet their own housing needs. Where no limits are set, we will apply a threshold of £50,000 for household income. In the Midlands a threshold of £16,000 will apply for savings or asset value, in London and the South East this will be £30,000. Welfare benefits are excluded from income thresholds. Applicants above these limits will only be accepted with the approval of the Assistant Director of Housing. Non-disclosure of savings, assets or income later identified will be classified as fraudulent and could result in legal action to recover any property let under such pretences.
- ❖ Owner occupiers are not usually eligible to apply but may be considered for Independent Living schemes for older people where there is an evidenced need

and they have insufficient equity in their home for any alternative options, as per the asset value thresholds stated.

- ❖ Current customers of PA Housing are required to have lived at their current property for a minimum of 12 months before they can apply for a transfer. They must also have successfully completed any starter or introductory period of their tenancy.
- ❖ Customers must also have maintained their current home to an acceptable standard, as identified by a pre-transfer inspection. Any debt for rechargeable works must be cleared.
- ❖ Customers wishing to transfer who have arrears of rent might only be considered at the discretion of the Head of Income and Inclusion or equivalent role, and the following guidance should be used – Arrears under £500 to be cleared in full wherever possible, or a minimum of 3 months adherence to repayment plan. Arrears of £501-£1000 – minimum of 6 months adherence to repayment plan. Arrears of over £1000 will only be considered in exceptional cases.
- ❖ Any applicant who has threatened a PA Housing colleague or representatives will not be eligible, unless authorised by the Assistant Director of Housing.
- ❖ Any applicant who has paid money to illegally obtain a tenancy, or otherwise obtained a tenancy by deception; or any applicant who has committed a breach of tenancy that would have entitled the landlord to possession under a Ground listed in schedule 2 of the Housing Act 1988 will not be eligible.

4.2 Treatment of previously evicted applicants

Whilst the new PA Housing tenancy agreement introduced in 2017 indicates that if a customer evicted or abandons their home they will not be given another home by PA Housing in the future, previous customers who have been evicted might be nominated by a Local Authority as part of a future Homeless duty.

For the avoidance of doubt any such applicant / household will be ineligible for PA Housing accommodation for the minimum periods stated in the table below:

	All sub-regions:
Anti-social behavior	10 years (subject to risk assessment / review of legal action)
Rent Arrears	5 years (plus repayment of the debt)
Tenancy fraud	Permanently

4.3 Qualification

Applicants for Independent Living schemes for older people should be aged 55 or over. Where any other age restrictions apply, for example general needs properties for over 50-year old's, both PA Housing and the local authority will comply. Where Independent Living properties are advertised on a choice-based lettings scheme applicants may be bypassed if the move would be of no demonstrable benefit to their housing needs (for example moves within a scheme on the same floor level).

We may assess the needs of older applicants to ensure that these can be met by the services available at any given scheme.

PA Housing will seek to ensure that any applicant nominated or considered for transfer meets the qualifying criteria for the property in terms of:

- ❖ Being physically suitable for the applicant, for example due to size, floor level, or disability access needs
- ❖ That any specific criteria for a particular client group are met
- ❖ Where any property has been advertised specifying preference to applicants with a particular Local Connection, that this is met and evidenced.
- ❖ That the nominee or a member of their family would not, in our opinion, be likely to cause, or be the victim of, a serious housing management problem at the property (This would not necessarily preclude the offer of another property elsewhere and is usually described as a 'sensitive let')
- ❖ That the nominee will be able to conduct their tenancy satisfactorily, with tenancy sustainment or other agency floating support if needed. If support is needed then PA Housing will seek additional information to confirm engagement with the support by the applicant.

4.4 Verification

PA Housing will always request and retain a copy of photographic ID for all incoming residents at the point at which they are made an offer of accommodation. We will also take a photo of the resident. This is to guard against future tenancy fraud and to ensure that the applicants' details match those provided by the nominating authority. For direct applicants we will carry out Right to Rent checks in accordance with Home Office guidance. We may also carry out additional checks including, but not limited to,

- ❖ Reference checks with current or previous landlord
- ❖ Criminal records background check / national fraud initiative data sharing
- ❖ Credit check and / or Income assessment including benefit entitlement

4.5 Open / Closed list / Direct applicants

In order to carry out programmes of localised redevelopment, PA Housing may on occasion need to suspend the 'normal' priority for transfer applicants and a temporary reduction in the percentage of units offered to the local authority. This will allow us to accommodate affected residents swiftly and considerately.

If PA Housing finds that the number of applicants on any sub-regional housing register is grossly disproportionate to the number of properties becoming available in any given year, we may close the register to new applicants for a determined period of time. We may also review our banding scheme and eligibility criteria so that only those in the greatest need might access the register.

Direct applicants will only be sought once nomination agreement arrangements have been satisfied, any shortlist of nominations have been exhausted and the local authority have confirmed they are unable to provide any further suitable nominations.

4.6 Assessment of applications

Applicants will be assessed according to a banding scheme to determine their relative priority. There are 4 bands:

- Emergency housing Need – (Band A / Category 1)
- Urgent housing Need – (Band B / Category 2)
- Identified housing Need – (Band C / Category 3)
- Keyworker or Choice Plus applicants – (Band D / Category 4)

The following housing needs are considered when determining an applicant's priority:

- ❖ Medical needs evidenced by the relevant professional (including mental health needs)
- ❖ Current housing status,
- ❖ Social circumstances and welfare needs
- ❖ Financial sustainability
- ❖ Support needs
- ❖ Level of under-occupation / overcrowding in the current home

Please see Appendix 2 for further information on the banding scheme.

4.7 Bedroom need matrix (with variation)

PA Housing has adopted the Department for Work and Pensions (DWP) guidelines for bedroom entitlement and Housing Benefit / Housing element of Universal Credit eligibility. Local demand means that in the Midlands sub-region there may be cases where a different specification can be awarded as per the table below:

Number of bedrooms	Overall no. of occupants	Midlands sub-region maximum occupancy	London and South East sub-region max occ.
0	1	Single Adult	Single Adult
1	1-2	Single / Couple *	Single / Couple *
2	2-4	Single/Couple plus 2 children of same sex up to age of 16, OR 2 children of different sex up to age of 10 OR A non-residential carer, providing overnight care for a resident adult Couple with agreed medical need for separate bedrooms	Single/Couple plus 2 children same sex of ANY age where less than 10 year age gap OR 2 children of same sex if more than 10 year age gap between them if oldest is under 16 OR 2 children of different sex up to age of 10 A non-residential carer, providing overnight care for a resident adult Couple with agreed medical need for separate bedrooms
3	3-6	Any additional children subject to the same sharing criteria above Any other single adult member of household aged 16 plus	Any additional children subject to the same sharing criteria above
4	4-8		Any child over the age of 16 where there is more than a 10 year age group to the next same sex sibling
5	6 plus		Any other adult household member(s) aged 18 plus

*A single adult within the household (who is not the applicant) would only be entitled to a separate room if there is no other person they can share with. However, an adult would not be expected to share with their own child.

Where additional bedroom need may apply –

- ❖ If an additional, or sole occupancy bedroom is recommended by a professional practitioner supporting a household.
- ❖ If a 2 bedroom Independent Living property cannot be let in a reasonable time frame to a qualifying household requiring 2 bedrooms, then under-occupation may be permitted.
- ❖ In the Midlands sub-region only, where the needs of the household are likely to change in the next 12 months (e.g. through pregnancy, the age of the children, or another household member returning to live with the household).
- ❖ Where children reside jointly with separated parents, the family will be expected to evidence the division of their parental responsibility, e.g. Family Court Order or which parent is in receipt of child benefit.

In the Midlands sub-region only where a child(ren) reside three or more nights per week they would qualify for dual bedroom eligibility as per above. In London and the South East sub regions a child(ren) would qualify for bedroom eligibility at one, principal home, only.

4.8 Multiple and provisional offers

PA Housing will make Provisional Offers to prospective customers, subject to an evaluation process prior to the signing of a tenancy. This evaluation may include a home visit or assessment of an applicant's needs, a pre-tenancy Income assessment, any other background checks which are required, and the viewing of the property.

PA Housing may also issue multiple offer letters to prospective customers and arrange an open viewing of an available property. Each letter will indicate the ranking in numerical order of the applicant included in the multiple offer.

4.9 Withdrawal of offers

PA Housing reserves the right to withdraw a provisional offer of accommodation at any stage during the re-let process if there are any concerns about the prospective customer's ability to successfully maintain a tenancy, or their requirements are found to be different to those indicated by their application.

4.10 Refusal of offers

If an applicant is nominated by a Local Authority and wishes to refuse an offer of accommodation, PA Housing will advise the applicant to seek immediate advice from that local authority as to the consequences this may have for any future housing assistance. If the Local Authority wishes to enforce the offer PA Housing will allow no more than 5 days for the applicant to reconsider.

Where applicants from a register held by PA Housing have bid on a property through choice-based lettings, and wish to refuse the property, then sanctions may apply. The refusal will be considered and determined if reasonable or not. Reasonable reasons to refuse a property may include mis-advertising of the property, e.g. floor level; or it not being suitable for adaptation. In London and the South East sub-region only one reasonable offer of accommodation will be made to transfer applicants due to the shortage of social housing available. Should an applicant refuse a suitable offer of a property they have bid on their application may be suspended for 6 months. In the Midlands sub-region an applicant may be allowed up to three refusals before this sanction is applied. Any such decision will be made by the Lettings Manager based on whether the offer would have resolved the applicants housing needs and whether all the information was available to the applicant at the time of their bidding.

4.11 Intentional worsening of circumstances

Applicants will not be accepted for transfer if they have deliberately worsened their own housing circumstances by carrying out a mutual exchange to a less suitable property than their previous home.

Any other deliberate action, or inaction, which results in a worsening of the applicants' housing circumstances, will render that need exempt from consideration when determining the priority of that applicant unless exceptional circumstances are proved.

Households able to resolve their own housing needs by renting a suitable property in the private sector without recourse to public funds, however, choose not to do so, will not be awarded priority under the banding scheme.

4.12 Rights of Appeal

All applicants have the right to appeal against any allocation decision taken by PA Housing. This may include where PA Housing has decided their application is ineligible, that they do not qualify for accommodation, or an offer of accommodation is withdrawn. The applicant must express this in writing within 21 days of the decision having been made. If the applicant remains dissatisfied with the outcome of the appeal, they should seek independent advice. They should only follow the PA Housing complaints process if they can demonstrate that there has been a failing of the organisation to follow this policy.

5 Wider Initiatives

5.1 Local Lettings Policies

PA Housing may operate local lettings policies on some estates to demonstrate our commitment to creating and maintaining sustainable homes and local communities. Where these are introduced the need for such will be clearly evidenced with data collected internally and externally and agreed in conjunction with the local authority and customers or stakeholders in the community. Any additional criteria or eligibility requirements will be clearly indicated to all prospective applicants. Alternatively, applicants identified as Key workers or through the Choice Plus scheme might be prioritised for allocations.

In addition to the above, vacancies arising from proceedings where crime or violence has taken place in the immediate location of the home will be classed as 'sensitive lets'.

5.2 Other Agencies

PA Housing may choose to operate Service Level Agreements or Agency and Consortium Agreements with a range of Agencies, and Social Housing Providers in order to assist in rehousing some of their clients. These would usually be difficult to let properties, or where the local authority has been unable to successfully nominate, or specific schemes that have a set eligibility criterion. Accommodation based floating support for residents may also be offered by such agencies.

5.3 'High Risk' allocations

PA Housing will expect any nominating Local authority to share all relevant recent medical or risk-related paperwork in accordance with data sharing protocols, for the safeguarding of our colleagues and other residents. We reserve the right to refuse to re-house high-risk potential nominees where all the relevant professional agencies involved do not support the allocation or fail to provide the required paperwork. In some cases, we may refuse a high-risk applicant for a particular property due to locally

specific circumstances but consider them for housing elsewhere. We may seek to interview the potential nominee prior to any offer being made to ensure they are aware that commitment to engaging with support services is integral to their maintaining a tenancy. In some instances, we may ask a potential nominee to sign an Acceptable Behaviour contract in addition to their tenancy agreement.

PA Housing will work in partnership with Probation and the Police in relation to rehousing applicants subject to Multi Agency Public Protection Arrangements or National Accommodation Strategy for housing Sex Offenders risk management. On occasion we may be approached directly by such organisations or by a local authority on their behalf, and a direct offer of accommodation may be made outside of any choice-based lettings advertisement.

5.4 Sustainment and Affordability

PA Housing will carry out an affordability assessment with households to offer support and maximise their income potential, especially where a cap on benefits may apply. We will clearly state the level of rent applicable on each nomination request or advertised property and will work with applicants to ensure that they have a sufficient income to meet this. In rare occasions this may mean that we refer a nominated household back to the local authority if we cannot demonstrate that they can afford to pay the rent.

PA Housing lets a proportion of properties at Affordable Rents which are up to 80% of local market rent, or the local housing allowance, whichever is lower. Once a property has been let at Affordable Rent it will not revert to a social rent. We may seek to prioritise households in employment for such properties, and any such distinction would be made clearly aware to applicants when advertised.

In areas of higher deprivation, we may seek to allocate homes to applicants who are working, in training or in higher education in order to contribute to local economic growth, and the development of sustainable mixed communities. This may be on a case by case basis or as part of a wider local lettings or regeneration plan and agreed with the local Authority as required.

6 Other Client Groups / Access routes

6.1 Supported Housing

The primary source of Allocation for supported housing is direct referrals from the relevant professional bodies, services, or the Local Authority. They will be responsible for any panel or approval process.

For schemes managed directly by PA Housing, nominations may be provided by the support provider or the Local Authority. PA Housing reserves the right to refuse these nominations, only if specific concerns are raised as per sections 4.3 and 5.4 of this policy.

Extra Care living is available to prospective customers with support needs as identified by the commissioning Local Authority, who will set any additional eligibility requirements and / or assessment process.

6.2 Key Worker accommodation

Where properties have been designated for key workers these will be let on assured shorthold tenancies to qualifying direct applicants at approximately 80% of the market rental value, plus any service charges. The Local authority will usually define which public sector roles they consider to be 'key' as this may vary regionally. Applicants will need to provide proof of their employment and their income as the same thresholds

apply as to other applicants. Right to rent checks will also be carried out. Once allocated a property, key worker customers are not eligible to apply for transfer. However, if their property is designated for redevelopment or disposal an alternative key worker property may be offered at PA Housing's discretion, subject to the tenancy having been conducted satisfactorily.

In some cases, and with specific agreement, PA Housing may let social or affordable rented properties to key workers as part of a strategy of sensitive lets to manage serious anti-social behavior.

6.3 Management Transfer

A management transfer is a transfer that takes place outside of the usual transfer process. Management transfers are offered under extremely limited circumstances and on a single offer only basis.

A management transfer can be considered if a tenant or member of their household is at risk of significant harm from someone not living in their household. This can be due to serious domestic abuse, gang violence, or being a victim of cuckooing or hate crime.

Supporting evidence must be provided from an appropriate police officer, the chair of a safeguarding panel, Multi-Agency Risk Assessment Committee (MARAC) or via vulnerability matrix.

There will also be occasions where a management transfer is required following completion of an individual personal emergency evacuation plan (IPEep), where it has been identified that the resident or family are unable to evacuate the property in the event of an emergency.

Also there are circumstances where we will consider a management transfer following receipt of an official medical report from an occupational therapist or qualified medical practitioner detailing the following,

- Medical diagnosis and supporting documentation
- Why the current property is unsuitable related to their medical condition
- Any future housing needs

Once this information has been received a management transfer based on medical information can be considered.

For all agreed management transfer cases, then subject to the caveat below, the tenant will be entitled to one reasonable offer of a property of the same bedroom size as they currently occupy. If the offer is refused, an appeal will be heard by the Head of Housing Services.

In the event that no suitable property is identified within a reasonable period from the date the management transfer is agreed (not exceeding six months) the tenant will not be entitled to an offer within our stock and we will endeavor to work with the local housing authority and any other relevant agencies to encourage a move to a suitable property outside of our stock.

If a management transfer has not been completed within six months, the risk will need to be re-confirmed by the relevant supporting agency.

6.4 Mutual Exchange

PA Housing residents have the right to 'swap' or exchange tenancies either with other PA Housing residents, or with residents of other social housing providers. We will retain membership of the 'Homeswapper' national scheme, or an equivalent service, to facilitate these mutual exchanges. For most customers this is the most likely way that they will be able to move. Residents who do qualify to register for transfer must also register and actively seek a mutual exchange as they will be able to potentially access properties owned by many different landlords. A customer may not apply to transfer within 12 months of having moved into a property by mutual exchange unless there has been a sudden and unforeseen change in their circumstances.

Further detail is given in the Mutual Exchange policy, as this is not considered an allocation under this policy.

6.5 Allocations to Colleagues / Relatives / Contractors / By virtue of employment

All applicants are asked to declare any interest they hold in PA Housing. We may provide accommodation to its board members, employees, former employees and their close relatives provided that;

- ❖ They are in housing need and meet the allocation criteria
- ❖ They receive exactly the same consideration as any other applicant
- ❖ They have no involvement or influence over the allocation decision

PA Housing will not consider applications from former employees if they have a conviction or pending legal action for alleged criminal activity related in any way to their employment with PA Housing, or to PA Housing's residents.

A small number of roles such as some scheme caretakers require employees to occupy PA Housing accommodation as part of their duties. Accommodation shall not be offered with the job unless it is specifically necessary. In such cases PA Housing will deal with this solely through the contract of employment and this is not considered an allocation. Upon leaving employment these employees would only be rehoused if a contractual requirement exists or if they are housed through a nominations process. The accommodation offered would not be in the scheme where they worked.

If a person is dismissed from employment by PA Housing they will not normally be rehoused.

Close scrutiny will apply to all potential allocations to employees and contractors or their close relatives and will require impartial review and Director level approval.

7 Compliance

7.1 False Information

An application may be cancelled if it found that false or misleading information has been given. If this is identified after the applicant has been granted a tenancy, we may take action for possession of that person's home in accordance with legislation.

7.2 Customer consultation and feedback

PA Housing is committed to involving its customers in developing services and improving Service Delivery. Residents were consulted on whether this policy was clear and easy to understand. Their feedback has been incorporated into this policy.

7.3 Data Protection

Under the Data Protection Act 1998 and the Human Rights Act 1998 all personal and sensitive information, however received, will be treated as confidential. PA Housing will only involve other agencies or share information with the applicants' permission unless:

- ❖ The information is necessary for the protection of children
- ❖ We cannot by law withhold information from the Police that would assist a criminal investigation
- ❖ Where we subscribe to formal information sharing protocols with other agencies such as the Police

7.4 Equality & Diversity

We treat all customers fairly, and with respect, and will not discriminate against any person on the grounds of disability, gender reassignment, pregnancy and maternity, race religion or belief, age, sex, sexual orientation, or marriage and civil partnerships.

PA Housing monitors the protected characteristics of applicants to ensure that this policy is applied fairly and consistently. We review allocations data annually in comparison with statistics from local authority housing registers to promote equal opportunities and tackle social exclusion.

This policy has undergone an equality analysis to ensure that no applicant is disadvantaged as a result.

8 Training

PA Housing will carry out induction and refresher training for all relevant colleagues to ensure they are aware of our policy. All managers will receive specific training to provide the skills and knowledge to comply with our policy and associated procedures.

9 Monitoring and Reporting

Monitoring of performance and customer satisfaction is key to ensuring that we achieve our objectives covered by this policy. We use a variety of methods to do so, including but not limited to;

- ❖ Performance reports
- ❖ Customer profiling
- ❖ Regular reviews with local authorities of strategy and performance
- ❖ Benchmarking against other Registered Providers
- ❖ Internal audit
- ❖ Resident scrutiny and satisfaction surveys
- ❖ Annual report to residents and Board

10 Legislation (including but not limited to;)

- ❖ Housing Acts 1988 and 1996
- ❖ Welfare Reform Act 2012
- ❖ Localism Act 2011
- ❖ Housing and Planning Act 2016
- ❖ Data Protection Act 1998
- ❖ Equality Act 2010

- ❖ Housing and Regeneration Act 2008
- ❖ Immigration (Residential Accommodation) (Prescribed Requirements & codes of practice) (Amendment) Order 2016
- ❖ Human Rights Act 1998

11 **Linked Policies**

- ❖ Mutual Exchange policy
- ❖ Decant policy
- ❖ Integrity and Bribery policy

Appendix 1; Boroughs / Districts and Sub-regional divisions

'The Midlands'	'London'	'The South East'
Ashfield District Council	Barking and Dagenham	Arun
Bassetlaw District Council	Barnet	Aylesbury*
Blaby District Council	Brent	Elmbridge (LSVT status)
Bolsover District Council	Camden	Epsom and Ewell
Broxtowe District Council	Croydon*	Guildford
Charnwood Borough Council	Ealing	Hounslow
Chesterfield Council	Greenwich	Kingston-upon-Thames
Corby Borough Council	Hammersmith and Fulham	Merton
Daventry Borough Council	Haringey	Reading*
East Northants Council	Harrow	Richmond-upon-Thames
Gedling Borough Council	Hillingdon	Runnymede
Harborough District Council	Islington	Spelthorne
Hinckley and Bosworth Borough Council	Lambeth	St Albans*
Kettering Borough Council	Lewisham	Watford*
Leicester City Council	Newham	Woking
Mansfield District Council	Redbridge	
Melton Borough Council	Southwark	
Newark and Sherwood District Council	Tower Hamlets	
North East Derbyshire District Council	Waltham Forest	
North Kesteven District Council	Wandsworth	
Northampton Borough Council		
Nottingham City Council		
Nuneaton and Bedworth Borough Council		
Oadby and Wigston Borough Council		
Rugby Borough Council		
Rushcliffe Borough Council		
Rutland County Council		
South Kesteven District Council	*Croydon has been treated as a London borough for the purposes of matching the extremely high levels of demand for housing	*Those boroughs marked with an asterisk are to be incorporated into this sub-region as part of future integration to be covered in the next policy review.
South Northants Council		
Wellingborough Council		

Appendix 2; Priority categories of applications

	Main criteria to be met to award:	Sub regional variations
Category 1 Band A Emergency Need	<ol style="list-style-type: none"> 1 High medical or mobility needs where life might be endangered by current accommodation (e.g. can't evacuate in event of a fire) supported by professional review 2 Present home to be demolished or redeveloped; or longer term emergency / disrepair works are required. 3 Under-occupying by 2 or more bedrooms 4 Management Move status – e.g. applicant affected by serious threat of DA / hate crime / violence supported by police 5 Applicants deemed to be statutory homeless 6 Emergency welfare need to move not involving external threat 7 Applicant occupies a home with significant disabled adaptations which are no longer required 8 Where a customer has succeeded to a tenancy on the basis of a move to a smaller property which meets their housing needs 9 The household is overcrowded by two or more bedrooms –Midlands sub-region only 	<ol style="list-style-type: none"> 5. Midlands and London only 8. London and SE only 9. London and the SE sub-regions award up to a Band B for overcrowding
Category 2 Band B Urgent Need	<ol style="list-style-type: none"> 1 The household is overcrowded by 2 or more bedrooms – London and SE sub-region only 2 Medical needs confirmed by professional review 3 A welfare need where a tenancy has become unsustainable 4 Applicant is suffering on-going ASB affecting their ability to work, serious harassment, supporting evidence needed 5 Applicants who are ready to move on, either from supported housing or prison, support and risk plans to be provided 6 Under-occupying by one bedroom 7 Applicants who are leaving the armed forces 8 Applicants who are sofa-surfing, of no fixed abode, or in temporary housing 9 Applicants relocating to take up employment 10 The household is overcrowded by one bedroom – Midlands sub-region only 	<ol style="list-style-type: none"> 3. SE only 7, 8 & 9. Midlands only
Category 3	<ol style="list-style-type: none"> 1 The household is overcrowded by one bedroom – London and SE sub-region 	

<p>Band C Identified Need</p>	<p>only 2 Low level medical / mobility need confirmed by professional review 3 Low level but persistent anti-social behavior and options such as mediation have been tried 4 Applicants wishing to transfer to Independent Living for older people who have no other housing need 5 Where there is a social or welfare need linked to a specific location away from the current home e.g. to access family support or support service facilities 6 Where an applicant has been approved for adoption, confirmation from adoption panel required 7 Applicants living with family and friends who have been asked to leave 8 Non-dependent children (18+) who are looking for a first-time tenancy 9 Applicants with any other recognised housing needs can be added to this category</p>	<p>6, 7, 8 & 9. Midlands only</p>
<p>Category 4 Band D Key worker / Choice Plus applicants</p>	<p>1 All Key workers seeking accommodation 2 Applicants in full or part time employment (16 hours or more per week) for at least 12 months 3 Applicants who have volunteered for community work for 16 or more hours per month for at least 6 months 4 Applicants who are running a business within the local community 5 Applicants who are renting privately and current rent is greater than 40% of their income 6 Existing customers who have demonstrated positive behavior and want to move but do not have a housing need</p>	<p>2, 3, 4, 5 & 6. Midlands only</p>