



# **Allocation Policy**

## **2019 UPDATED JULY 2023**

**Approved:** August 2019  
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**If you have difficulty with sight, or if you require a translated copy of this policy, we would be pleased to provide the information in a form that suits your needs.**

## Introduction

This policy sets out how we let any properties that become available. It explains how we match applicants to properties and how we will decide which applicants will be made an offer of rehousing.

The policy covers our general needs, adapted and retirement housing and applies to those on our waiting list as well as current tenants who are looking for a housing transfer. The policy covers all our housing stock across Govanhill and Merrylee.

## Our aims

We aim to provide good-quality rented accommodation to people in housing need. As a housing association based within the multi-cultural community of Govanhill, we aim to be accessible to a diverse local demographic and to meet local housing need. The policy also allows us to respond to the needs of people who require to move to the area. We want to make sure our community is sustainable, accessible and balanced and that we attract new residents and existing residents want to continue living within our community.

We will aim to:

- Provide good quality affordable housing to households who have been assessed as being in need of housing.
- Make best use of the housing which becomes available, including properties that have been adapted or are suitable for someone with mobility needs.
- Give as much choice to applicants as reasonably possible.
- Help create and maintain a balanced and sustainable community.
- Work constructively with Glasgow City Council to prevent and alleviate homelessness.

We will do this by taking an approach to allocating homes which:

- Is fair, open and transparent.
- Takes a consistent approach to decision-making.
- Promotes equality.
- Treats all applicants with respect, including respecting the confidentiality of information given to us.

## **Complying with the law and good practice**

Our policy is also compliant with the relevant Scottish and UK legislation, including all relevant housing legislation. A full list of the relevant legislation is included at Appendix A.

As a Registered Social Landlord (RSL), we are regulated by the Scottish Housing Regulator (SHR). The SHR's statutory objective is to safeguard and promote the interests of current and future tenants, homeless people and other people who use services provided by social landlords. In developing our policy, we have taken account of good practice, including that developed by the Scottish Government and the SHR.

The policy also takes account of the Scottish Social Housing Charter. The SHR use the outcomes and standards in the Charter to assess the performance of social landlords. The key outcomes that have been considered in the development of this policy are:

**Outcome 1:** Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

**Outcome 2:** Tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.

**Outcome 7:** People looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them.

**Outcome 8:** Tenants and people on housing lists can review their housing options.

**Outcome 9:** People at risk of losing their homes get advice on preventing homelessness.

**Outcome 10:** People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and their prospects of being housed.

### **Equal opportunities**

We promote equal opportunities and in applying this policy we will aim not to discriminate against any individual, household or group on grounds of race, gender, sex, marital status/civil partnership, gender reassignment, sexual orientation, pregnancy or maternity, religion or belief, language, social origin, disability, age or other personal attribute. This means that:

- When we are providing housing services and employing staff to provide these services, we will aim to provide equal opportunities for everyone, and treat everyone fairly.
- No person or group of people applying for housing will be treated less favourably than anyone else for any reason.
- We will aim to identify and respond to the needs of disadvantaged groups by building close relationships with those groups.
- To help us meet our commitment to equal opportunities, we will collect and monitor details of the ethnic or racial origin and any disabilities of everyone applying for housing.

We may offer a tenancy to employees, committee members, former employees, former committee members and close relatives of these people, but only in line with the SHR's guidelines. These guidelines are designed to make sure we consider applications fairly, and that nobody receives special treatment as a result of their connections with us.

## **Our properties**

We currently have 2,569 properties for rent but we only have a moderate turnover. This means that only around 200 properties become available every year. Over 90% of our housing stock is tenemental flats. We have very few houses.

The size and type of our properties limits the number of families we can re-house. Of our homes, 47% have only one bedroom, 39% have two bedrooms and 13% have three or more bedrooms. As a result, we can only very occasionally offer help to large families in housing need.

In addition to our general needs housing, we also have a small number of amenity housing stock. On average we have one vacancy in our amenity housing stock every two years.

Further information on our housing stock and on the number and type of properties becoming available can be found on our website at: <http://www.govanhillha.org/>

## **Joining our mainstream housing list**

Anyone aged 16 years or over is entitled to make a housing application and join our housing list. We give details of how to apply to us for housing on our website, in our office and in other local community buildings in our area. We give partner organisations, other social landlords and Glasgow City Council regular updates on how to apply for housing with us.

All applications will be registered on the housing list. However, if an applicant is found to be ineligible to be actively considered for an offer of housing they will be notified in writing of the decision and their application will be suspended. They will not be eligible for an offer of housing until circumstances change and their application becomes active. The reasons why we may suspend an application are set out in Appendix B.

Please note that admission to the housing list does not automatically mean that someone has the right to be housed. The priority given to an applicant depends on their current housing situation. The Association will only accept completed applications that include the relevant identification.

### **Joining our amenity housing<sup>1</sup> list**

Amenity housing aims to meet the needs of older people who want to live independently but who would benefit from receiving some support (from Alert Call). We hold a separate list for applicants who are interested in living in our amenity housing complex. The arrangements for joining the amenity housing list are the same as for the mainstream list, except that applicants:

- Will usually be 60 years of age or over; and
- Will have a medical, social, safety or particular housing need that could be met by retirement housing.

If the applicant household is a couple, only one of the couple needs to meet the criteria set out above.

We recognise that there may be people aged under 60 who would benefit from living in amenity housing and we would discuss this with the applicant on a case by case basis.

### **Size of property**

Our properties vary considerably in terms of the mix of single and double bedrooms. We currently assess the size of property an applicant requires based on the regulations set by the Department for Work and Pensions. We aim to make best use of the properties we have but also be as flexible as possible in taking what applicants would prefer into account. Our policy will be that:

- Couples or partners share one double bedroom.
- Heads of households and single parents have one single or double bedroom.
- Two children of the same sex under the age of 16 will share one double bedroom.

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<sup>1</sup> Also referred to as Retirement Housing

- Two children under the age of 10, regardless of their sex, will share one double bedroom.
- Children of different sexes will need a single bedroom each once they reach 10 years old, unless there is another child in the household of the same sex with whom they could share a double bedroom.
- No more than two people should share a bedroom.

These rules may not apply if there are certain medical or social reasons why it is impossible for household members to share a bedroom.

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If any member of the applicant household is pregnant, from six months into the pregnancy we will reassess your housing need as needing an extra bedspace.

As our larger properties are in particularly short supply, we are only able to offer a bedroom to a child or children for whom the property will be their principal home. If joint custody arrangements are in place, and time is divided evenly between the parents or guardians, we will consider the household which receives child benefit payment to be the child's principal home.

### **Choice of property types and locations**

We want to work with applicants to create sustainable tenancies. We take a housing options type approach and provide an opportunity for all applicants to discuss their housing options and prospects when they first join our list.

We want to make sure that we only offer applicants a home they are interested in. We will ask applicants which areas and types of property they are interested in, including which floor levels they would prefer. We will only make offers which reflect those preferences.

Restricting the type of properties and the areas they are interested in may affect an applicant's chance of receiving an offer, particularly if they are not interested in areas where we have the highest number of lets becoming available. We will, if applicants wish to, discuss this when they submit their application form. Applicants will be able to change their preferences at any time.

### **Information required**

Before we can assess your housing needs, we will need proof of your circumstances, this may include, for example, proof of any part-time custody issues with children, or proof if any members of your household are pregnant. We will not be able to assess your application until you have filled in all the appropriate forms and you have provided all the proof, we have asked you for. We will usually visit you at your home to check your circumstances before we make you an offer of housing.

## **Suspensions**

You may be suspended from the housing list if you provide false or misleading information to further your housing application. Further information on our suspensions policy is provided at Appendix B.

## **Taking home ownership into account**

Changes introduced by the Housing (Scotland) Act 2014 mean that we can take account of whether an applicant owns or has owned a property. If you own a home but are not able to stay in it, for example because major repairs are being carried out, we could consider offering you a Short Scottish Secure Tenancy. This would mean staying in one of our properties until you were either able to return to your current home or make other living arrangements.

## **Change of circumstances**

If your circumstances change while you are on our housing list, you should contact us so that we can review your housing needs. If you move house while you are on our list, you may need to make a new application.

If you would rather not receive offers of housing for a period of time - for example because you are not well, and it is not a good time to consider moving - we can defer your application. You would remain on the list, but we would not make you any offers of housing until you contact us again and tell us you are actively interested in being rehoused. Prioritising applicants

This section explains how we decide which applicants will be made an offer. Govanhill Housing Association operates a points-based assessment of housing need and we have developed our pointing system to reflect local needs and priorities whilst ensuring that we comply with all the necessary legislation and guidance.

## **Factors we cannot consider**

There are certain factors which the law states we cannot consider when allocating housing. These are:

- Your age (except for our retirement housing).
- Whether you already live in Glasgow and the Govanhill or Merrylee areas in particular.
- You or your family's income.
- Any housing debt you have now repaid.
- Any non-housing debt such as Council Tax arrears.

- Any housing debt which is not owed by you, such as rent arrears owed by your partner.
- Any rent arrears where the amount is no more than one month's rent, or where you have an arrangement in place to pay the arrears, and you have been keeping to the arrangement for at least three months and you are continuing to do so.

### **Factors we must take into account**

Housing legislation states that we must give 'reasonable preference' to the following groups:

- Homeless persons and persons threatened with homelessness and who have unmet housing needs.
- People who are living under unsatisfactory housing conditions and who have unmet housing needs.
- Tenants of houses which are held by a social landlord, which the social landlord selecting its tenants considers to be under-occupied.

We have taken these reasonable preference categories into account when developing this policy.

### **Unmet housing needs**

The first two of the reasonable preference groups (homelessness and unsatisfactory housing conditions) are subject to the qualification that the applicant should also have unmet housing needs which are not capable of being met. As part of our housing options work with the applicant we will look at:

- the applicant's circumstances; and
- the existing housing options which are available and accessible to them.

If an applicant is able to meet their own housing needs, we may not give them priority. An example might be if the applicant's current home can be adapted to meet their mobility needs. However, if a waiting list or transfer applicant is awarded points under this policy, we would generally consider them to have an unmet housing need.

### **Our letting groups**

Our approach to letting properties is based on a 'groups and points' system.

Applicants who make a direct application to us and who already have a tenancy with us will be placed in our transfer group. All other direct applicants will be placed in our waiting list group.

We will also work with Glasgow City Council in meeting the needs of statutorily homeless applicants. We do not make decisions about whether a household is statutorily homeless. This is the responsibility of Glasgow City Council which then refers homeless households to us to be made an offer of housing.

## Our letting targets

In order to further our aim of supporting sustainable and balanced communities, we aim to make lets to applicants from each of the three groups – transfer list applicants, waiting list applicants and statutorily homeless applicants referred to us by Glasgow City Council.

We will aim to make a broadly similar number of lets to each of the transfer, waiting and statutorily homeless lists. We will set annual targets for the proportion of lets we aim to make to each group. The targets will be reviewed every year based on:

- Patterns of need and demand on our own transfer and waiting lists.
- Patterns of turnover within our own stock – including the types and sizes of properties which are becoming available for let.
- Our agreement with Glasgow City Council covering lets to statutory homeless households.

Our targets will be published and will be available on our website. We will monitor our performance against these targets and will publish performance information on our website. This information will also form part of our performance reporting to the SHR.

## Pointing awards

All applications (other than statutory homeless applications) will be assessed and given points according to their current housing situation and personal circumstances. In assessing need we will consider the needs of everyone who would be moving – in other words of the whole household listed on the application.

The points that will be awarded are shown in the table below and the categories are explained later in this section. In some of the categories, only one award of points can be made. If more than one award within that category would be possible, the highest single award will be made to the applicant household.

Category	Other information		Points
<b>Your home is too big or too small</b> (one award only)	Overcrowding points are awarded if the home you are currently living is not big enough for all the people living in it	One bedroom short	40
		For every additional bedroom short	25

	You live in a social rented sector property and the home you are currently living in is too big for all the people living in it	One bedroom too many	40
		Per additional bedroom too many	25
<b>Your accommodation is not secure</b> (one award only)	You have a definite date to lose your accommodation within 2 months		70
	You live in tied accommodation or supported accommodation and you have been told you will need to leave within the next 6 months		40
	You have no settled accommodation		40
<b>You need to move for health or mobility reasons</b> (one award only)	You or a member of your household is an emergency medical case and cannot leave hospital because your current property is no longer suitable and it would be dangerous to return home		200
	You or a member of your household has serious health or mobility difficulties, your current home is completely unsuitable and there is a need to be re-housed as a matter of urgency		70
	You or a member of your household have serious health or mobility difficulties, your current home is very unsuitable and makes daily activities very difficult		40
	You or a member of your household have health or mobility difficulties your current home is unsuitable and makes daily activities difficult		20
<b>You need to move because of harassment or abuse</b> (one award only)	You are in a life-threatening situation and need to move immediately. This includes Domestic abuse that is life threatening (you must escape a violent/abusive partner or family member that you currently live with)		250
	Domestic abuse – when you have been forced to leave the family home because of violence/abuse from a partner or family member		150
	You have been a victim of serious harassment or violence and need to move as a matter of urgency		70
	You have been a victim of harassment and need to move		40
<b>Category</b>	<b>Other information</b>		<b>Points</b>
	No inside toilet		25

<b>Your home is in poor condition or lacks facilities</b> (maximum award in this category is 70 points)	No bathroom or no hot water supply to bathroom	25
	No kitchen or no hot water supply to kitchen	25
	Significant damp	25
	Lacking central heating	15
	Kitchen is not separate to sleeping area (bedsit)	15
<b>You are sharing facilities with another household</b> (one award only)	You are sharing facilities (kitchen, bathroom etc) with 4 people or more who are not going to be part of your household when you move	40
	You are sharing facilities (kitchen, bathroom etc) with 3 or fewer people who are not going to be part of your household when you move	20
<b>You want to move for social reasons</b>	You would benefit from receiving the support offered in retirement housing ( <i>awarded to amenity housing applicants only</i> )	40
	You want to move closer to someone who gives you regular support	20
	You want to move closer to someone to whom you give regular support	20
	You want to move closer to where you work or are in further education or training.	20
<b>Management reasons</b>	We have an urgent need to move you, for example because your home needs urgent repairs	250
<b>Two into one</b>	Two Govanhill tenants joining households	50
<b>Moving on from a bedsit or single bedroom property</b>	You are one of our tenants and have been living in either a bedsit or one single bedroom property for 3 years or more	40

## Further information on housing needs categories

### Your home is too big or too small for your needs

*Applicants can only receive one award of points in this category.*

We want to assist households to live in homes that are the right size for them. This also helps makes the best use of our own housing stock.

**Overcrowding:**

You will receive points for overcrowding if you have use of less bedrooms in your current home than we assess your household to need. You will be awarded points for every bedroom that you are short. If two or more members of your household are required to share a single bedroom, we will also consider this to equate to being a bedroom short.

The initial points will be awarded when one extra bedroom is required, and additional points are given for each extra bedroom that the household requires. For example, a household that needs one more bedroom would receive 40 points and a household requiring two more bedrooms would receive 65 points.

We will not award overcrowding points if you overcrowd your current property by moving people into your home who will not be part of your household when you move.

**Under Occupation**

You will receive points in this category if you are a tenant in a social rented sector property and have more bedrooms than you require. Our own tenants would be eligible for this award, as would tenants of other housing associations or of a local authority.

The initial points will be awarded for having one extra bedroom. It will not matter if the bedroom is a single or a double bedroom. If you have two or more bedrooms than you need you will receive a further award. This means that a household that has one more bedroom than they require would receive 40 points and a household that has 2 more bedrooms than they require would receive 65 points.

You will only receive under occupation points if you are looking to move to a smaller property and your household will fully occupy that smaller property.

**Your accommodation is not secure***Applicants can only receive one award of points in this category*

This category covers situations where you may be at risk of losing your current home through no fault of your or you do not have a home which you have a right to occupy and your accommodation is temporary. We will always encourage a household which may be eligible for insecurity points to make a homelessness application to Glasgow City Council. You will receive points if you have been given a definite date to lose your accommodation and that date is within 2 months. Examples might include if you are living in a private rented property and your landlord has issued you with a legal Notice to Quit or Notice to Leave. Other examples might include that you are currently living in armed forces accommodation and have discharge papers from the armed forces and or are losing your home as a result of a mortgage repossession.

We will also award points to households living in tied accommodation (this is accommodation provider by an employer) or supported accommodation who have been given notice that they need to leave that accommodation within 6 months.

If you have no accommodation of your own (for example you do not own a property or do not have a private tenancy in the name of someone who is part of the household which will be moving) you could be awarded points for having no settled accommodation. No settled accommodation points would be awarded if you move frequently among relatives and friends.

We will not award *no settled accommodation points* to applicants who have stable housing and are continuing to live as part of a household they have been a member of for some time – an example might include a young person who continues to live with a parent but is otherwise adequately housed and is safe. However, an applicant in these circumstances would be entitled to sharing facilities points (see below).

### **You need to move for health or mobility reasons**

*Applicants can only receive one award of points in this category*

We may award health or mobility points if your health or the health of a member of the household you will be moving with is affected by their current housing circumstances or if you are struggling in your current accommodation because of mobility problems. If you or a member of your household has a mental health issue that is adversely affected by their housing circumstances, you may also be eligible to receive points under this category.

*It is important to note that priority will not be given based on a health problem but based on whether a move could alleviate some of the problems being experienced as a result of the health or mobility problem.*

If you think you may be eligible for health or mobility points you should complete the *application for medical priority* included with the application form. If you are already on the list but your health has changed, and you think you may be entitled to priority you can submit a *medical priority application* at any time.

The number of points awarded will depend on the extent to which any health or mobility issues are impacting on your day to day life and whether a move of home could help alleviate some or all of these problems.

If more than one member of your household has a health or mobility need, the needs of all the relevant members will be assessed and the points awarded will be equivalent to the highest level of need amongst household members. However, only one award will be made.

If you have been awarded health or mobility points we will only make an offer of rehousing which would address some or all of the problems you are having.

### **You need to move because of harassment or abuse**

*Applicants can only receive one award of points in this category*

Harassment can take many forms including intimidating, threatening or aggressive behaviour, both verbal and physical, and can involve attacks on property as well as people. Harassment is often premeditated and recurring.

You will be awarded points in this category if you or a member of the household who will be moving with you is being subjected to harassment or abuse and being rehoused will help to address the problem. The number of points awarded will depend on the seriousness of the harassment and the speed with which you need to move.

In relation to domestic abuse, when the abuse is life threatening and you need to escape a violent/abusive partner or family member that you currently live with we will award your application 250 points.

When you have been forced to leave the family home because of violence or abuse from a partner or family member your application will be awarded 150 points.

Our overriding principle where harassment is alleged – and an applicant appears to be at risk – is that he/she should be believed. However, with the applicant's consent, we may ask agencies such as the Police or social services to confirm any involvement they have had. However, verification of harassment from other agencies is not a condition required for an applicant to be given the appropriate priority and each case will be dealt with sensitively and on its own merits.

### **Your home is in poor condition or lacks facilities**

*A maximum of 70 points are available in this category*

You may be eligible for points in this category if you are living in a property which is in poor condition or which lacks basic facilities.

You will be awarded points if your home lacks an inside toilet or has no bathroom or kitchen.

You will also be awarded points if your home does not have central heating or if you have no hot water supply to the kitchen or bathroom. If you live in a privately rented property and do not have hot water or functioning central heating because of a fault (such as a broken boiler) we will expect you to report any faults to existing facilities to your landlord and seek to have them addressed. If the faults are not addressed, we may consider awarding points in this category.

If the property you are living in suffers from significant damp, we will award points.

We will also award points if your main designated sleeping area is not separate from your kitchen, in other words if you live in a bedsit-style property. These points will not be available if someone is sleeping in a kitchen area because there are insufficient bedrooms for the number of people living in the property. In that case, overcrowding points would apply.

## **You are sharing facilities with another household**

*Applicants can only receive one award of points in this category*

You can receive sharing facilities points if you are sharing a bathroom or kitchen with anyone who is not going to be rehoused with you. This could apply if you are living with parents, other relatives or friends, living with a former spouse or partner following a relationship breakdown or are living in hostel or bed and breakfast type accommodation.

The number of points you are awarded will depend on how many people (adults and children) you are sharing facilities with and who would not be moving with you.

## **You want to move for social reasons**

You may want to move to Govanhill or Merrylee for a number of other reasons and you may be eligible for points if you want to move to the area or within the area for a number of social reasons.

Points may be available if you wish to move because you are providing support to, or are receiving support from, someone living in the Govanhill or Merrylee area. This could include if you provide day-to-day support which allows someone to continue living independently or if you need that support yourself and it can be provided by someone living in the Govanhill or Merrylee area. We will also consider situations when parents or guardians need assistance from friends or relatives to assist with childcare on a regular basis.

We will also award you points if you work in the Govanhill or Merrylee area or have a firm offer of employment in the area and wish to move closer to that work. We will award points if it would take you an hour or more to travel to work, further education or training from your current home using public transport.

If you are applying for sheltered housing, we will carry out a basic assessment of whether you would benefit from the particular support services which are available within our sheltered housing. If you will benefit, you will receive points under this category, but you do not need to be awarded points under this category in order to join our sheltered housing list.

## **Management reasons**

Management reasons allows us to assist in urgent re-housing cases where the allocation policy would not otherwise allow us to act quickly enough. It is only used in exceptional circumstances, such as where there is a serious risk if someone remains in their current home or if we wish to re-house one of our tenants as a matter of urgency. This might be because we must carry out emergency repairs to a property, because someone needs to leave hospital as soon as possible but cannot return to their current home or because they are otherwise in danger if they stay in their current home.

A decision to award Management reasons points will always be approved by the Head of Tenancy Services or Tenancy Services Manager.

## **Two into One**

If you are a tenant of Govanhill Housing Association and you would like to join together with another household which also has their own tenancy with us, you may be eligible for 'Two into One' points. We would only award points under this category if you want to give up your individual tenancies and move into a new home together.

## **Moving on from a bedsit or single bedroom property**

We have a small number of bedsit or small single bedroom properties which are available to single people. We recognise that one of our tenants may be interested in moving on from one of these properties at some point in the future.

If you have lived in one of these properties for 3 years or longer, and apply for a transfer with us, you will be eligible for *Moving On* points.

## **Outcome of assessment**

Once we have assessed your application, we will write to you to inform you of the outcome. If your application has been awarded points, we will tell you how many and for which of your needs. Please note that you can remain on our housing list if you do not have any identified need under our policy and you may still be eligible for an offer of housing.

## **Making best use of stock**

We aim to make best use of the properties which become available for let. This means that when certain types of properties become available for let, we will aim to offer them to households who need a property of that particular type. We will aim to offer the property to the household with the highest number of points who also needs a property with the particular features available.

The best use approach will apply to all properties which have already been adapted to meet the needs of someone with mobility problems or a disability. We will normally only offer adapted properties and properties with wheelchair access to applicants who need the facilities they contain. We will accept direct referrals from Glasgow Centre for Inclusive Living for these properties if no-one on our housing list has appropriate needs.

We will also consider best use if letting a non-adapted ground floor property which could meet the needs of someone with mobility issues or a disability.

Our stock has a mix of properties with double and single bedrooms. We will also aim to make use of available properties by offering properties to applicants who need a property with the particular combination of double and single bedrooms available.

We will generally take the same best use approach to the letting of any new stock (either homes we have built or properties which we have acquired) which is not covered by a Local letting Initiative (see below). In particular, we reserve the right to make best use of such lets to address housing needs which we have otherwise been unable to meet, such as significant overcrowding amongst our own tenants.

## **Making offers**

When we are aware that a property is about to become available, we will draw up a list of applicants whose needs match it, with the applicant with the highest number of points at the top. Where more than one applicant has the same number of points, we will then consider who has been on our housing list for longest.

We will contact applicants near the top of that list to review their application, see if they are still interested in that type of house and that their circumstances are still the same. Once the property is available, we will make an offer of housing to the applicant at the top of the list at that time.

If the applicant on the top of the list does not wish to accept the offer, we will offer the property to the applicant who is second on the list.

If any property has been offered and refused four times, we reserve the right make an offer to an applicant who expressed a specific interest in a property of the relevant type or in the particular area. A decision to make such an offer will always be approved by a Senior Housing Officer or Manager.

## **Number of offers**

We want to make sure that applicants are made offers of housing that suit their needs and are in areas they want to live in. Applicants can choose the areas of Govanhill in which they are interested.

If we offer you two suitable properties that meet your needs and choices, and you reject them both, we will ask you to review your choices for re-housing, to make sure any properties we offer you in the future are suitable. We will not make a further offer of housing until you formally contact us, preferably in person, to review your area choices.

If, after this review of your street choices, you then refuse a third offer of housing, we may suspend your housing application for up to 6 months. This would mean that you receive no more offers of housing during that 6-month period.

Other reasons why an application could be suspended, along with the length of that possible suspension, are set out in Appendix 2.

## **Adapted properties**

There may be exceptional circumstances where a property designed for someone with special needs, or which has undergone major adaptations, becomes available but there is no one on our housing list who needs a property of that size and design or who can make good use of the adaptations that have been carried out.

Rather than leaving the property empty, we reserve the right to offer the property on a Short Scottish Secure Tenancy to an applicant who does not need a property with the special features available. However, we would expect them to agree to move to another suitable

property provided by us, if someone requires the specially designed or adapted property at a later time.

If we were offering someone a property on this basis, we would make this arrangement clear to the applicant at the offer stage. If the applicant preferred not to accept the offer, the offer would not count against their entitlement to three offers of housing.

### **Mutual exchanges**

We allow our tenants to exchange homes with another tenant (our tenant or another Registered Social Landlord's tenant) in certain circumstances. However, you must not exchange homes until you have our written permission and the landlord of the tenant you want to exchange with and signed the necessary legal paperwork.

If you are our tenant, you must let us know immediately when you find someone you would like to exchange homes with. We will consider your and the other tenant's rehousing needs. We will not refuse permission for the exchange to go ahead unreasonably.

### **Homeswapper**

We will cover the cost of admission, for our tenants, to the Homeswapper on-line mutual exchange service provided there are no current breaches of tenancy.

### **Referrals from other agencies**

We may consider referrals from statutory or voluntary sector agencies who are seeking accommodation for a client. This may include us assisting if someone needs to move on from specialist or supported accommodation. We manage any referrals of this type at a senior level and in consultation with the referring organisation. All aspects of this policy may not be applied in making any offer.

### **MAPPA arrangements**

Multi-Agency Public Protection Arrangements (MAPPA) were introduced as a result of the Management of Offenders etc (Scotland) Act 2005. We manage any allocations to offenders covered by the MAPPA arrangements at a senior level and in consultation with relevant agencies such as the police and Social Work Services. All aspects of this policy may not be applied in making any such offer and any offer of housing will be dealt in line with MAPPA (Multi Agency Public Protection Arrangements) Protocols which cover the Glasgow area.

### **Local Lettings Initiatives**

A Local Lettings Initiative can be a useful way of helping to create sustainable communities and there may be occasions when Govanhill Housing Association will develop and implement such an Initiative. An Initiative might be designed to address issues such as low demand or poor property condition.

Any Initiative will apply only to a geographically defined area and any changes made to this policy will be designed to meet specific local aims. Any initiative will have clear outcomes and will be supported by evidence as to why it is required.

As part of the development process, we will consult with the local community and key external partners, including Glasgow City Council. The Initiative will be compliant with all the relevant legislation, will be published in the same way as this policy and will include:

- An explanation of why the Initiative is needed and the evidence that has been used to inform the decision to introduce it.
- Clear and specific aims and objectives.
- The time period for which the Initiative is expected to remain in place.
- An effective monitoring framework to make sure the aim of the Initiative is being met and there are no unforeseen consequences. This will include criteria that will be used for deciding whether to curtail or extend the time period for which the Initiative will run. The Initiative will be reviewed regularly to ensure it is still required.

## **Confidentiality**

We will keep any information you give us confidential. We will not discuss your application with anyone other than you (or your representative) unless you give us written instructions to do so.

We are registered in the Data Protection Register. We will let you see any information we hold about you in line with the Data Protection Act 2018. You must ask us in writing and a charge may apply.

## **Service standards and reporting**

When we receive your application for housing, we will give you a receipt and a reference number within 5 working days.

We will tell you the outcome of the assessment of your application within 20 working days of receiving your application (as long as we have the proofs we need and your completed application form).

We will review your application every year. We will do this by writing to you to enquire whether you wish to remain on our list. If you do not respond to this letter within the specified timeframe your application may be cancelled.

We will report regularly to our Housing Services Sub-Committee on turnover, letting timescales, the types of applicants we are housing and the nature of our vacancies.

Every year, we will publish information on our letting performance.

We will consult fully with our customers about reviewing the allocation policy.

### **Translations and Interpreters**

Our allocations policy can be made available in other formats and other languages where required.

We employ staff who can speak Urdu, Punjabi, Slovak, Czech, Romanian and Farsi. You can speak to them about any aspect of our services or your application at one of our dedicated surgeries or by making an appointment. Please contact our switchboard on 0141 636 3636 for details. We will also use external interpreters to assist us with other language requirements.

## **Complaints and appeals**

If you believe we have made an incorrect decision while assessing your application for housing, we have a clear procedure for dealing with appeals about decisions we make during the application and allocation process. If you are unhappy about a decision made, you should first appeal to the Housing Services Sub-Committee. If you are still not satisfied, you can then appeal to the Management Committee.

Any member of the sub-committee who is involved in considering your appeal will not take part in decisions involving any further appeal.

We also have a complaints policy which covers failures in our service and our standards of service delivery. You can get information leaflets explaining the complaints policy from our office and it is also available on our website.

If you have gone through the complaints procedure and you are still not happy, the Scottish Public Services Ombudsman may take up the matter for you. Write to:

Scottish Public Services Ombudsman  
4 Melville Street  
Edinburgh  
EH3 7NS.

## Appendix A – Relevant Legislation and Regulation

The Allocations Policy has been developed to be legislatively compliant, with the following legislation of particular relevance:

- Housing (Scotland) Act 2014
- Welfare Reform Act 2012
- Housing (Scotland) Act 2010
- Equality Act 2010
- Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012
- Housing (Scotland) Act 2006
- Homelessness etc (Scotland) Act 2003
- Housing (Scotland) Act 2001
- Human Rights Act 1998
- Data Protection Act 2018
- General Data Protection Regulation (EU) 2016/679 ("GDPR")
- Children (Scotland) Act 1995 as amended by Children and Young People (Scotland) Act 2014
- Housing (Scotland) Act 1987 (as amended)

## Appendix B – Suspending applications

There are circumstances where you will be entitled to stay on the housing list, but you may be suspended from receiving any offers of housing for a limited length of time. Any suspension will be non-statutory suspensions.

The reasons why we may consider suspending an application, along with the length of that suspension, are set out in the table below.

Suspension reason	Length of suspension
You owe us, or another landlord, a tenancy related debt such as rent or rechargeable repairs, and this debt is more than one month's rent	Until you have kept to a repayment agreement for three consecutive months
You or any members of your household are guilty of anti-social behaviour	12 months

Any violence or aggressive behaviour towards staff this covers both verbal and physical abuse	12 – 36 months dependent on the severity of the abuse
You have deliberately worsened your housing circumstances	12 months
You or any members of your household have broken or not kept to the conditions of your tenancy agreement, for example you have damaged your home, or have not maintained your garden or the shared areas properly.	Until the breach is rectified and maintained for three consecutive months
You have given us false information on your application form	12 months
You have refused three offers of housing	6 months

We will consider your circumstances before deciding how long to suspend your application for. We will aim to reduce the need for, and the length of, suspensions. If we suspend your application, we will tell you what you need to do before we will review or remove the suspension.

If you are unhappy with our decision to suspend your application, you should follow the appeals procedure set out in the policy.

## EQUALITY IMPACT ASSESSMENT

***This assessment is consistent with the Equality Act 2010 and takes into account all the protected characteristics defined in the Act.***

<b>Name of Policy</b>
Housing Allocation Policy
<b>Is this a new or revised policy?</b>
Revised Policy. Previous full policy redevelopment took place 2014-15
<b>What are the aims of the policy? What needs and/or duties is it designed to meet</b>

The aims of the policy are to:-

- Provide good quality affordable housing to households who have been assessed as being in need of housing.
- Make best use of the housing which becomes available, including properties that have been adapted or are suitable for someone with mobility needs.
- Give as much choice to applicants as reasonably possible.
- Help create and maintain a balanced and sustainable community in Govanhill and Merrylee.
- Work constructively with Glasgow City Council to prevent and alleviate homelessness.

The policy is also required to meet a number of statutory duties and the legislation that has been taken into account is listed in Appendix 1 of the policy. This includes the Equality Act 2010, Equality Act 2010 (Specific Duties) (Scotland) Regulations 2012, Human Rights Act 1998 and the Children (Scotland) Act 1995 as amended by Children and Young People (Scotland) Act 2014

The policy includes a clear statement that highlights our understanding of and commitment to equalities duties.

#### **Who are your customers?**

The Govanhill housing list is open to all potential applicants over the age of 16. There are no restrictions on the right to apply for a home. Applications are then assessed according to the policy to determine the level of housing need.

#### **Do you have customers from equalities groups? Which groups?**

There are potentially customers from all equalities groups.



**Record of Data/Engagement; Impacts Identified; Potential Actions to Meet Duties**

	Data that you have <sup>1</sup>	Community engagement exercises or mechanisms <sup>2</sup>	Impacts identified (actual and potential) <sup>3</sup>	Actions to mitigate impacts, advance equality of opportunity, eliminate discrimination and foster good relations
Community Cohesion Community cohesion is what must happen in all communities to enable different groups of people to get on well together.	Census Data GCC Ward 8 Southside Central Factsheet GCC Glasgow Indicators Project Housing List data Tenant Profile data	Consultation: Drop –In sessions MERGE Group RTO's Focus Groups (different languages) Website Newsletter	There is a potential impact on small areas with low demand and high levels of PRS stock in mixed tenure blocks	The ability to develop and implement local lettings plans is included in the policy. Discretion can be used in making lets where the stability of a community may be compromised.
Age People of all ages.	Census data GCC Ward 8 Southside Central Factsheet GCC Glasgow Indicators Project Housing List data Tenant Profile data	Consultation: Drop –In sessions MERGE Group RTO Merrylee Focus Groups (different languages) Website Newsletter		The policy aims to put a number of mitigating mechanisms in place such as housing options advice.

<sup>2</sup> Glasgow Council for Independent Living.

<p>Disability</p> <p>A person is disabled if they have a physical or mental impairment which has a substantial and long-term effect on their ability to carry out normal day-to-day activities.</p>	<p>Census data</p> <p>GCC Ward 8</p> <p>Southside Central</p> <p>Factsheet GCC</p> <p>Glasgow</p> <p>Indicators Project</p> <p>Housing List data</p> <p>Tenant Profile data</p>	<p>Consultation:</p> <p>Drop –In sessions</p> <p>MERGE Group</p> <p>RTO Merrylee</p> <p>Focus Groups (different languages)</p> <p>Website</p> <p>Newsletter</p>	<p>The policy takes full account of the impact of, and relationship between disability and ill health on housing need. Priority can be awarded accordingly.</p>	<p>Amenity Housing</p> <p>Best use of stock re ground floor properties</p> <p>Ensuring adapted properties relet to those who need them.</p> <p>Proactive relationship with GCIL<sup>2</sup></p>
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	Data that you have <sup>1</sup>	Community engagement exercises or mechanisms <sup>2</sup>	Impacts identified (actual and potential) <sup>3</sup>	Actions to mitigate impacts, advance equality of opportunity, eliminate discrimination and foster good relations
<p>Gender Reassignment A transsexual person is someone who proposes to, starts, or has completed a process to change his or her gender. A person does <u>not</u> need to be under medical supervision to be protected.</p>		<p>Consultation:</p> <p>Drop –In sessions</p> <p>MERGE Group</p> <p>RTO's</p> <p>Focus Groups (different languages)</p> <p>Website</p> <p>Newsletter</p>	<p>Awareness of issues around harassment and sensitive lettings. Also need to exercise sensitivity when considering ID documentation.</p>	<p>Staff awareness training if required.</p> <p>Equal Opportunities Form currently under review to capture all nine protected characteristics of which this is one</p>
<p>Pregnancy and Maternity Protection is during pregnancy and any statutory maternity leave to which the woman is entitled.</p>	<p>Housing List</p> <p>Transfer List</p>	<p>Consultation:</p> <p>Drop –In sessions</p> <p>MERGE Group</p> <p>RTO's</p> <p>Focus Groups (different languages)</p> <p>Website</p> <p>Newsletter</p>	<p>Policy takes account of allocating suitable housing (size, type etc), as far as is possible, to women who are pregnant and/or within the statutory maternity leave period.</p>	

<p><b>Race</b> This includes ethnic or national origins, colour or nationality, including refugees and migrants; and gypsies and travellers.</p>	<p>Census data GCC Ward 8 Southside Central Factsheet GCC Glasgow Indicators Project Housing List data Tenant Profile data</p>	<p>Consultation: Drop –In sessions MERGE Group RTO's Focus Groups (different languages) Website Newsletter</p>	<p>Awareness of issues around harassment, hate crime and sensitive lettings. Policy prioritises rehousing on the grounds of harassment.</p>	<p>Staff awareness training if required. Equal Opportunities Form currently under review to capture all nine protected characteristics of which this is one</p>
<p><b>Religion or Belief</b> Religion includes religion with a clear structure and belief system. Belief means any religious or philosophical belief.</p>	<p>Census data GCC Ward 8 Southside Central Factsheet</p>	<p>Consultation: Drop –In sessions MERGE Group RTO's</p>	<p>Awareness of issues around harassment, hate crime and sensitive lettings.</p>	<p>Staff awareness training if required. Equal Opportunities Form currently under review to capture all nine protected</p>
<p>The Act also covers lack of religion.</p>	<p>GCC Glasgow Indicators Project</p>	<p>Focus Groups (different languages) Website Newsletter</p>	<p>Policy prioritises rehousing on the grounds of harassment.</p>	<p>characteristics of which this is one</p>

	Data that you have <sup>1</sup>	Community engagement exercises or mechanisms <sup>2</sup>	Impacts identified (actual and potential) <sup>3</sup>	Actions to mitigate impacts, advance equality of opportunity, eliminate discrimination and foster good relations
<p><b>Sex</b> Both men and women are covered under the Act</p>	<p>Census data GCC Ward 8 Southside Central Factsheet GCC Glasgow Indicators Project Housing List data Tenant Profile data</p>	<p>Consultation: Drop –In sessions MERGE Group RTO's Focus Groups (different languages) Website Newsletter</p>	<p>There is no evidence that the policy discriminates, directly or indirectly, on the basis of sex, particularly around access to children.</p>	

<p>Sexual Orientation</p> <p>The Act protects bisexual, gay, heterosexual and lesbian people</p>		<p>Consultation:</p> <p>Drop –In sessions</p> <p>MERGE Group</p> <p>RTO's</p> <p>Focus Groups (different languages)</p> <p>Website</p> <p>Newsletter</p>	<p>Need to be aware of harassment at a previous property, conflicts between young people and parents/family over sexuality, potential lifestyle conflicts when allocating a home.</p>	<p>Staff awareness training if required.</p> <p>Equal Opportunities Form currently under review to capture all nine protected characteristics of which this is one</p>
<p>Marriage and Civil Partnership</p> <p>Only in relation to due regard to the need to eliminate discrimination</p>		<p>Consultation:</p> <p>Drop –In sessions</p> <p>MERGE Group</p> <p>RTO's</p> <p>Focus Groups (different languages)</p> <p>Website</p> <p>Newsletter</p>	<p>No restrictions on household compositions when applying for housing, giving joint tenancies.</p>	<p>Equal Opportunities Form currently under review to capture all nine protected characteristics of which this is one.</p>
<p>Other Relevant Groups</p> <p>This could include carers, people experiencing domestic abuse, substance misusers, homeless people, looked after children etc.</p>	<p>Glasgow City Council</p> <p>Homelessness data</p> <p>Other relevant local authority data</p>	<p>Consultation:</p> <p>Drop –In sessions</p> <p>MERGE Group</p> <p>RTO's</p> <p>Focus Groups (different languages)</p> <p>Website</p> <p>Newsletter</p>		<p>Proportion of lets assigned to GCC referrals.</p>

<sup>1</sup> Data may be monitoring, customer feedback, equalities monitoring, survey responses, demographic/census data etc.

<sup>2</sup> These may be ongoing links you have with community and voluntary groups, service user groups, or one off engagement sessions you may have run.

<sup>3</sup> If data or engagement are missing and you cannot define impacts then your action may be to take steps to collect the missing information.

## Prioritised Actions

Action	Target Date	Lead Officer	Evidence of Progress	Success Measure
Review Equal Opportunities Form that forms part of the housing application pack	October 2019 Housing Service Sub - Committee	DHM		

#### Data, Engagement or Other Evidence Attached as Appendices

Title of Evidence	Date	Main Findings	Gaps in Data	Contact
<a href="https://www.understandingglasgow.com/indicators/population/overview">https://www.understandingglasgow.com/indicators/population/overview</a>		Consulted but data not relevant at this time		
<a href="https://www.glasgow.gov.uk/article/18820/Local-Ward-Factsheets">https://www.glasgow.gov.uk/article/18820/Local-Ward-Factsheets</a>		Consulted but data not relevant at this time		
<a href="https://www.scotlandscensus.gov.uk/ods-web/area.html">https://www.scotlandscensus.gov.uk/ods-web/area.html</a>		Consulted but data not relevant at this time		
Housing List & Transfer List data – in house as required		Consulted but data not relevant at this time		
Allocations Consultation	Various <sup>3</sup>	Contained in Appendix 1	N/A	Craigforth Consultants

<sup>3</sup> Noted within the Allocations Policy covering report

Signing of EQIA

*For Govanhill Housing Association:*

*Date:*

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## APPENDIX 3

A focus group-based approach was taken, with participants recruited by the Housing Association and reflecting the communities living in Govanhill. The participants were primarily current tenants, including some who had become tenants recently and some on the transfer list. There were also a small number of applicants at the groups.

Each group lasted between 45-90 minutes, with the key themes discussed reflecting the issues already identified by staff through their own allocation policy-related discussion.

### ***Theme 1: People with highest priority***

*Issue: We give a small number of people our highest number of points. This is because they have a very serious housing problem (such as very serious harassment or their property being unsafe because repairs are needed) and we want to make them an offer as quickly as possible.*

*Do you think we should limit the number of offers we make to people with this very high priority? For example, we might reduce their priority if we have offered them two different properties but they have turned them down.*

**Participant views:** There was a clear consensus across all the focus groups that the number of offers made should be limited. Key reasons given were that:

- If you are awarded such a high level of priority, your situation must be very serious, and you need a new home as quickly as possible. Under those circumstances, you would probably accept the first offer made.
- If people do not accept the first offer made, it might be useful to discuss why – for example they may not have understood the system or chosen the areas they meant to. After that, it would be reasonable to expect people to think very seriously about the next offer.
- There are lots of other people waiting for a new home. It is not fair for some people to ‘slow up’ the system, especially if their need is urgent. Is it really that serious if they are turning down multiple offers?

**Feed through to policy:** Number of offers section added to policy

## **Theme 2: Number of offers we make**

*We don't limit the number of offers we make people at the moment. This means that someone might be offered and turn down a number of properties.*

*Do you think we should limit the number of offers we make to the same person? For example, we might say that if someone has turned down two offers we wouldn't make them another offer for three months.*

**Participant views:** Again, there was a clear consensus across all the focus groups that the number of offers made should be limited, with very similar reasons given to those for the highest priority group.

Although everyone felt the number of offers should be limited, there was a range of views as to the right number of offers;

- A small number felt that only one offer is appropriate and that people turning down offers is a symptom of their either being too choosy or of expecting a better offer (in terms of area or condition of property) to come along. Some people felt that this is not realistic and, as with people with the highest property, suggests their housing need is not that great.
- Others favoured 2 or 3 offers. This was sometimes because of either the size of properties (in relation primarily to bedroom size) or the condition of properties. It was also noted that people could potentially be in very difficult situations or be very vulnerable at the point they are looking for a home, and that they should be given some choice/leeway at a difficult time.
- Overall, the balance between favouring 2 or 3 offers was relatively even tending slightly to two offers.

**Feed through to policy:** As per, highest property, number of offers section added to policy with appropriate feed through to suspensions section.

After discussion with staff, an approach based on 3 offers proposed.

### **Theme 3: People with very serious health or disability housing needs**

#### **People with very serious health or disability housing needs**

*There may be times when someone needs to move home very quickly because of health or disability needs. For example, they might only be able to leave hospital if they can move to somewhere without stairs.*

*Do you think we should make this group of people a very high priority? This would mean increasing the number of points we give them.*

**Participants views:** Everyone spoken to agreed that the Housing Association should prioritise meeting the needs of people with very serious health or disability housing needs. This was not only seen as fair and reasonable, but participants sometimes noted that making sure someone has a home that meets their needs will help other under pressure services, and in particular the NHS. Participants were happy to increase priority for this group if necessary.

**Feed through to policy:** After a further discussion with staff, it was felt that any issues may be operational rather than policy related and no specific change has been made.

However, a small change (allowing the points total to exceed 200 under exceptional circumstances, would allow the Housing Association to put in place a 'by exception' a response to any particular issues/challenges to emerge.

#### **Other issues:**

Participants also discussed the possibility of introducing a 'time served' approach for anyone who takes an offer of a bedsit property or a property with a very small (effectively a single) bedroom).

There was a broad consensus that this was a fair approach and that, if someone needs somewhere to live, they should accept a smaller property. However, participants did feel that giving people an option/hop of being able to move on was also fair and reasonable.

**Feed through to policy:** Move on from bedsit /single bedroom property award introduced