



Allocations Policy

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1. POLICY SUMMARY

This policy describes how people can apply for housing with us and how we allocate our accommodation.

2. APPLICABILITY

The Policy applies to

- All Staff
- Stakeholders
- Tenants
- Applicants

3. INTRODUCTION

- 3.1 Our Allocations Policy is underpinned by our organisational vision which is “To be a good landlord helping to develop vibrant communities in the areas of our homes.” We want to develop a long-term positive relationship with our new customers, so it is vitally important that we provide a housing solution that is appropriate to their needs.
- 3.2 We will work alongside other partner agencies and organisations as appropriate to help us achieve this ambition. We recognise that we have a role to play in assisting our Local Authority partners in meeting homelessness and wider duties to those in housing need. We will fully participate in the nomination’s agreement (where in place) between our respective organisations.

4. CONTEXT

Our Allocations Policy is set within the current political and regulatory context.

- 4.1 Allocation of Accommodation: Guidance for Local Housing Authorities in England.
- 4.1.1 The statutory guidance emboldens authorities to make use of the existing flexibilities within the allocation legislation to ensure that social homes go to people with the greatest housing need. The guidance suggests that authorities should consider serving/former members of the Armed Forces, households in work or seeking work, carers and prospective adopters and foster carers when setting their allocation schemes.
- 4.1.2 We will keep up to date with statutory guidance and are committed to working closely with our key local authority partners to ensure that we can work together to meet the housing needs in the areas in which we operate.
- 4.2 The Regulatory Framework for Social Housing in England
- 4.2.1 The current Tenancy Standard contains specific requirements around allocations and mutual exchange. Our Assignment, Mutual Exchange & Succession Policy contains more detail in this area. The Standard states that “Registered providers shall let their homes in a fair, transparent, and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants.” There are further specific requirements around tackling overcrowding/under-occupation, providing opportunities for transfers and working with local authorities to meet local housing priorities.

5. AIMS AND OBJECTIVES

5.1 We aim to:

- 5.1.1 Match applicants for housing to suitable homes that we have available for letting in a timely, open, and transparent way.
- 5.1.2 Create a balanced and sustainable community across our stock base.
- 5.1.3 Create sustainable lettings in homes that meet applicants' needs.
- 5.1.4 Ensure that we have in place appropriate checks to prevent fraud, ensure housing is allocated to people in housing need and balance the needs of applicants alongside the right of the existing community to quiet enjoyment of their homes.
- 5.1.5 Work closely with local authorities in the areas in which we operate to meet local-housing priorities.
- 5.1.6 Be accountable to applicants by providing clear information about our decisions.
- 5.1.7 Make best use of our housing stock.

6. STATEMENT OF INTENT

6.1 Strategic Management of our Waiting List.

6.2 To provide the best possible service to our customers and to efficiently administer the allocations process, we strategically manage access to our waiting list. In practice this means:

- 6.2.1 Applicants who have submitted the required documentation are assessed and placed on a Register of Interest in date order if satisfactory.
- 6.2.2 We will set aside 50% of our vacant properties for nominations from Stoke-on-Trent City Council. Acceptance onto the waiting list, reasonable preference waiting time and property eligibility will apply as normal to applicants seeking housing via nomination.

7. ALLOCATIONS

7.1 Transfers

- 7.1.1 Our existing Assured tenants may request a transfer to another one of our properties; we do not allow transfer from like-to-like properties without an urgent need or because of special circumstances, and an exception to this policy has been formally agreed by a member of the Executive Team. In addition, we do not allow transfers for Assured Shorthold tenancies unless there are special circumstances and an exception to this policy has been formally agreed by a member of the Executive Team. Any transfer requests outside of the above criteria can only be approved via an exception to policy request being submitted and approved.
- 7.1.2 Tenants requesting a transfer must:
 - 7.1.2.1 have a clear rent account;
 - 7.1.2.2 not to be in breach of tenancy; and
 - 7.1.2.3 their existing home has been kept in a satisfactory condition.

- 7.1.3 To help our tenants who need, or who are willing to downsize from a house thereby freeing up family accommodation, a specifically adapted property, or a bungalow, we will grant a priority preference to transfer applicants under-occupying their home.
- 7.1.4 Where a property is in poor condition or tenancy breaches (including rent arrears) exist, permission may be given to transfer by an exception report to the Director of Housing Management.
- 7.1.5 All existing tenants who wish to move will be required to undergo a pre-transfer inspection to ensure that their home has been maintained to an acceptable standard with no damage present. Where properties are found to be below the minimum standard, their offer of a move to other accommodation will be refused.
- 7.1.6 Where an existing customer needs to transfer to a ground-floor accommodation because of a health or mobility issue, reasonable preference will be given to their application on receipt of proof of their circumstances.
- 7.1.7 There may be exceptional cases where there is an overriding housing need for urgently allocating a home to an existing customer, for example, victims of domestic abuse or racial harassment and where there is evidenced threat to life or serious risk of harm. Such arrangements shall need to be carefully considered on a case-by-case basis and will require approval by the Housing Manager. These allocations will be outside our normal allocation routes and may need agreement with a local authority.
- 7.1.8 We will also consider a management move:
 - 7.1.8.1 where a move is required on substantiated medical or welfare grounds;
 - 7.1.8.2 in cases of overcrowding or under-occupation; or
 - 7.1.8.3 because of affordability where there are difficulties meeting bill payments (including rent), and the existing tenant would benefit from a transfer to a smaller and/or cheaper property.
- 7.1.9 If a tenant is approved for a management move, they will receive up to two reasonable offers and the management move request will remain valid for a period up to three months. All moves are at our discretion and can be withdrawn at any time.
- 7.2 Temporary Moves
 - 7.2.1 There may be circumstances where a tenant is required to vacate their property for a period.
 - 7.2.2 Where major works to a property are required which cannot be carried out with the tenant in occupation, this is only a temporary move, and the existing tenant will be expected to return to the original property once the work has been completed.
 - 7.2.3 Emergencies – Defined as fire, significant flood etc., where the tenant would be endangered if they were to remain in the property because it is unsafe.
 - 7.2.4 For temporary moves, tenants will be expected to accept the first reasonable offer of a property that meets their needs.

7.3 Managing Low Demand

- 7.3.1 We will regularly review demand and, where necessary, we will use a variety of methods to ensure that we market our properties successfully.
- 7.3.2 Advertising properties online and letting properties on a first-come, first-served basis subject to our normal allocation checks.
- 7.3.3 Proactive contact of potentially eligible applicants on our register of interest to secure a successful letting.
- 7.3.4 Holding open-property events and letting properties to applicants ready to move within our preferred property-letting timeframe.
- 7.3.5 When either our own internal waiting list, or the nominations process (including local lettings arrangements), is unable to identify an applicant for a property, we will consider contacting other agencies or using direct marketing to find a tenant such as advertising properties through commercial online lettings agencies. We will also advertise such properties through our website and through social media.
- 7.3.6 In these circumstances, consideration will also be given to applicants who would, in other circumstances, not be eligible for the property in question due to existing occupancy criteria. This consideration would have due regard to the sustainability of the tenancy and the circumstances of the applicant and of existing residents in neighbouring properties.

8. ELIGIBILITY

8.1 Charitable Status

8.2 We have charitable status and let properties according to the objectives of the association. A charitable beneficiary is someone in receipt of welfare benefits or on a low income, older people, people with disabilities, those who have a long-term physical or mental illness or people in other recognised charitable need.

8.3 Our charitable objectives mean that we must give priority to housing people on low incomes who would otherwise struggle to obtain affordable accommodation within the private housing sector. Low income means that an applicant's income is no more than 90% of the West Midlands average.

8.4 Local Lettings Plans, Planning Conditions and Section 106 Agreements

8.4.1 We are committed to working in partnership with local authorities to develop local lettings plans where needed, and to improve or maintain the sustainability of the communities in which we operate. Plans are unique to the circumstances of the individual area and are reviewed on an ongoing basis.

8.4.2 We will establish local lettings plans if and when appropriate, and ensure that they do not result in customers being adversely affected by them by monitoring them where they exist on an annual basis or sooner if required.

9. CONNECTION TO EPIC

9.1 We will not offer any unfair advantage to applicants who are employed by EPIC, their relatives, members of the Management Board, their relatives and anyone who has been employed or on the Board in the previous 12 months. We will do this by enforcing Section 122 of the Housing and Regeneration Act 2008 which restricts the making of gifts, and the payment of dividends and bonuses, by a non-profit registered provider to:

- 9.1.1 a member or former member of the registered provider
- 9.1.2 a member of the family of a member or former member
- 9.1.3 a company which has as a director a person within paragraph (a) or (b)

9.2 For correctness and probity, we will obtain Executive Team approval prior to any granting of a tenancy to any person in the above categories, and such approval will be noted in our records.

10. ACCESS TO THE REGISTER AND ONLINE APPLICATION

10.1 All Applicants will be directed to apply online via our Online Application Form. Our website will detail where we have properties located. Where an applicant has specific difficulty accessing the online process, we will provide support to complete a paper-based form.

10.2 An assessment of the application will take place; we can only accept fully completed applications. Applicants will be asked provide Landlord references for all tenancies held by the applicant for the previous five years.

10.3 We will carry out an annual review of our waiting list.

11. IDENTITY CHECKS

11.1 Applicants will be advised to submit proof of identity along with the application form. An applicant that refuses to provide any relevant checks and/or provides false information will have their application refused. Applications will not be accepted where information is missing.

11.2 We ask each applicant and member of the household aged 18 or over to provide the following documentary evidence. Copies should be attached to the online application form and will be verified before any tenancy sign-up.

11.3 For properties that we let directly (not via a nomination), we need to verify each adult's identity in conjunction with the government's [Right to Rent Scheme](#). If you are not a British or Irish citizen, you can usually get a share code to prove your right to rent. We can use this share code to check if you can rent and how long for. If we need a share code, we will ask you to provide one. To view and prove your immigration status you can get a share code by visiting [View and prove immigration status](#) by visiting the GOV.UK website.

We will therefore require:

- 11.3.1 Two proofs of current address dated within the last 3 months.
- 11.3.2 A joint applicant living at the same address only needs to provide one additional proof of address.
- 11.3.3 The proofs of address should be for where an applicant is living for most of the time. A care-of address which is different to the address that an applicant is living at can only be accepted by exception from a member of the Executive Team, due to the

potential for fraud. Where an applicant has no permanent address, further checks must be undertaken.

- 11.3.4 One proof of identity for nominees from the Council. Wherever possible photographic identify should be provided (e.g., Passport, Driving Licence, Work Identity Card, Proof of Age Card, National Identity Card).
 - 11.3.5 Where photographic identity is not available, a birth certificate, bank statement or old-style paper driving licence is acceptable, however, a photograph of the applicant(s) is required for fraud prevention purposes where photographic identity is unavailable.
 - 11.3.6 For direct applicants, without a passport or identity card, two proofs of identity are required in accordance with the Right to Rent checklist published by the government.
- 11.4 Further guidance is contained within the Right to Rent process.
- 11.4.1 Proof of National Insurance Number.
 - 11.4.2 Proof of income or benefit entitlement.
 - 11.4.3 Proof of residency and/or right to remain in the UK where applicable.
 - 11.4.4 Proof of pregnancy (if applicable).
 - 11.4.5 Children's birth certificates or proof of Child Benefit entitlement
 - 11.4.6 Details of all landlords over a five-year period.
 - 11.4.7 Any other information relevant to processing an individual's application for housing, including details of any illnesses.
 - 11.4.8 Proof of landlord details for applicants who are privately renting (copy of tenancy agreement, rent book or similar).

12. RENT IN ADVANCE AND AFFORDABILITY

- 12.1 Throughout the application and allocations process, the applicant will be reminded for the required payment of one month's rent in advance on signing the tenancy agreement.
- 12.2 The applicant will also be asked to pay their rent via Standing Order.
- 12.3 Tenants will be required to sign a disclaimer form if accepting a tenancy that is not covered by the Local Housing Allowance or relevant Benefit Entitlement. An example of this is where a tenancy is subject to under-occupancy charges for Council Tax purposes.

13. PROPERTY ELIGIBILITY

- 13.1 Applicants who applied for housing under Version 1 of this Allocations Policy will have their confirmed property eligibility upheld until a later review of this Policy under Version 3.

13.2 Version 1 States

We will consider household size, economic status and the number of bedrooms required by customers when offering properties. Maximum Property Size		
Number of People	Employed/Pension Credit Age	Unemployed
Single	2-bed flat *	1-bed flat
Couple	2-bed flat *	1-bed flat
2 adults not living together as a couple	2-bed flat	2-bed flat
Family (1- or 2-parent) with 1 child	2-bedroom flat or 2- or 3-bedroom house *	2-bedroom flat or house
Family (1- or 2-parent) with 2 children under 10 years of age	3-bedroom house *	2-bedroom flat or house
Family (1- or 2-parent) with 2 children aged 10 to 15 of the same gender	3-bedroom house *	2-bedroom flat or house
Family (1- or 2-parent) with 2 children aged 10 to 15 of different gender	3-bedroom house	3-bedroom house
Family (1- or 2-parent) with 3 or more children	3-bedroom house	3-bedroom house

13.3 Applicants joining the waiting list from 1 October 2023 will only be considered for properties that meet their housing need. Where there is no demand for a vacant property due to size, the property will be managed under 7.3 of this policy (Managing Low Demand). Applicants will not be allocated accommodation larger than that required to meet their needs where there is the potential for affordability and tenancy sustainment issues.

Number of People	Bedroom Entitlement
Single	1
Couple	1
2 adults not living together as a couple	2
Family (1- or 2-parent) with 1 child	2
Family (1- or 2-parent) with 2 children under 10 years of age	2
Family (1- or 2-parent) with 2 children aged 10 to 15 of the same gender	2
Family (1- or 2-parent) with 2 children aged 10 to 15 of different gender	3
Family (1- or 2-parent) with 3 or more children	3 or 4*

*Subject to availability

NB: An extra bedroom is required for each person aged 16 or over unless they are living together as partners.

- 13.4 We will consider the following special circumstances when determining the number of bedrooms required, subject to suitable proof from the applicant:
- 13.4.1 Pregnancy – Where the applicant, or a person who would be expected to reside with the applicant, is 3 months or more pregnant, the household will be treated as if the child is already born.
 - 13.4.2 Access to children – We will require proof of receipt of Child Benefit before a child or children can be taken into account when considering property size.
 - 13.4.3 Foster children – Where the applicant accommodates foster children on a long-term basis (for a period of more than 6 consecutive weeks at a time), we will assess bedroom requirements as if the child or children are living within the household on a permanent basis.
 - 13.4.4 Where an applicant requires regular overnight care and receives one of the following benefits, we will take the requirement for an additional bedroom into account:
 - 13.4.4.1 the care component of disability living allowance at the middle or highest rate;
 - 13.4.4.2 attendance allowance;
 - 13.4.4.3 the daily living component of personal independence payment.

14. EXCLUSIONS

- 14.1 Applicants may be excluded from our waiting list in the following circumstances:
- 14.2 Where the applicant is aged under 18. However, we will consider applicants aged 16 or 17, who are defined as vulnerable, where the local authority has a legal duty to rehouse them and there is a leaving-care package of required support in place. We will undertake an additional assessment to ensure that there is a good prospect of the tenancy being sustained. This could include ensuring that there is appropriate support in place either via statutory, or third-party, agencies. We reserve the right to refuse an applicant if there is inadequate support in place to ensure the tenancy is likely to be sustained.
- 14.3 People who are subject to immigration control and who are not eligible for housing under the Allocation of Housing Regulations 2002, cannot be housed. We will ensure it complies with the requirement of the Immigration Act 2014 for landlords to only allocate a property to those who have a 'right to rent'.
- 14.4 Applicants who are not considered able to conduct a tenancy without appropriate support and where this support is not available, or the applicant is unwilling to accept such support.
- 14.5 Anti-Social Behaviour: If the applicant, or any member of their household, has been evicted for anti-social behaviour or breach of tenancy, has a current harassment or non-molestation order, Injunction Notice of Seeking Possession, or any other Court Order against them, which makes them currently unsuitable to be a tenant, will usually mean that they are ineligible for housing.

- 14.6 Applicants owing rent arrears with no repayment plan in place, or a repayment plan in place with arrears equivalent to four or more weeks of the amount the tenant is liable to pay directly still outstanding. Any outstanding arrears must be cleared before the applicant is accepted onto the waiting list and eligible for offers of accommodation.
- 14.7 Applicants who have failed to conduct a current or previous tenancy or licence in a satisfactory manner.
- 14.8 Applicants must be able to demonstrate that they will be financially able to meet their commitments. The applicant will be required to go through a series of assessments to determine their financial status. This will include an income and expenditure check, details of any existing debts and loans, arrears owed to a former landlord, any benefit overpayments and current or future restrictions to benefits.
- 14.9 Applicants who knowingly withhold or give false information that we use to process an application or an offer of accommodation.
- 14.10 Anyone who has damaged property from a former tenancy and has not remedied or agreed to remedy the damage, will have their application declined.
- 14.11 Applicants who have savings and/or equity in a property that exceed the level used by the government to exclude a person from any unemployment-related benefit (at the time of writing (Aug 2023) this figure stands at £16,000).
- 14.12 Where the applicant already owns a property elsewhere, either in this country or abroad. We can consider applications where the property is being sold (subject to our savings/equity limits), or where the applicant does not have access to their property because of a relationship breakdown or similar situation.
- 14.13 Where the applicant's household income is above the regional average. The regional average wage can be found by consulting www.nomisweb.co.uk.
- 14.14 Subject to the provisions of the Rehabilitation of Offenders Act 1974, persons convicted of a criminal offence where the nature and circumstances of the crime were such that it is considered that they may not be able to properly conduct a tenancy.
- 14.15 An applicant may be excluded where they have been convicted that is not spent of one or more of the following criminal offences and if the nature and circumstance of the offence indicates a potential risk to the residential community or staff members. This is not an exhaustive list and other related offences may be taken into account.
- Murder or attempted murder.
 - An offence specified within Schedule 1 of the Sexual Offences Act 1997.
 - An offence including damage to property belonging to another person, or arson.
 - Racially motivated or aggravated offences.
 - An offence including burglary, robbery, or aggravated burglary of a dwelling.
 - An offence including an assault resulting in actual bodily harm or grievous bodily harm in connection with residential premises.
 - An offence contrary to protection from harassment.
 - An offence involving firearms.
 - An offence involving the misuse of drugs in connection with residential premises.
 - An offence including the handling of stolen goods or property in connection with residential premises.

- An offence involving domestic violence.

14.16 Individuals who have been violent or aggressive to an employee, another landlord or local authority are likely to have their application refused. This is taken as an actual physical attack: serious verbal abuse or intimidating behaviour which has warranted a referral to the police and/or has required an incident report to be completed.

14.17 The above are not blanket exclusions and we will always consider individual circumstances before making a final decision on whether to accept an application onto the waiting list. We will inform applicants about any decisions that relate to the priority or eligibility of their application. Applicants excluded from our waiting list must wait a minimum of 12 months before they can reapply for housing. The only exception to this is where an applicant was excluded for rent arrears of less than £300 and there is documentary evidence that the arrears have subsequently been cleared in full. In such cases the applicant can reapply immediately for housing.

15. REJECTION APPLICATIONS AND THE RIGHT OF APPEAL

15.1 We are committed to letting our homes in a fair and transparent manner. We will judge each case on an individual basis and make every effort to resolve any possible ineligibility.

15.2 Where we reject an application, this will be explained clearly in writing, including the reasons for the decision. We will also provide details of our appeals process and signpost the applicant to housing advice for further support in relation to their housing situation.

15.3 Where an applicant who has been 'nominated' is refused, we will always update the relevant local authority.

16. REVIEWING AND CANCELLING APPLICATIONS

16.1 An annual review of waiting list applicants will be carried out.

16.2 Applications will only be accepted from applicants who provide all the necessary supporting documentation with their application. We will notify those who have failed who have missing documentation. If there is no response within 7 days their application will be cancelled.

16.3 Applicants who reject 2 offers of accommodation from us will have their application cancelled from the waiting list but are able to re-apply after 6 months if they still wish to be housed by us.

17. FURTHER IDENTITY CHECKS

17.1 If there is any doubt about the applicant's identity or address details arising from the home visit, further checks should be undertaken by staff to check the authenticity of the application. Such checks can include:

17.2 Contacting the local authority to see if the applicant is on the electoral register for their stated address.

17.3 Further checks with their landlord where an applicant is living in rented property.

17.4 Checks with the applicant's employer.

17.5 Where the visiting officer believes that external housing-related support is necessary for the applicant to sustain a tenancy, we require agreement from an appropriate support agency before the application is accepted.

18. OFFERING PROPERTIES

18.1 We want to ensure that applicants have the maximum amount of notice possible of a vacancy. This allows applicants time to plan their move and provides them with an adequate timeframe to provide notice to their current landlord where applicable.

18.2 Properties will be offered in strict date order and can only be overridden in the following circumstances:

18.3 The applicant has one working day to respond to the offer to view a property. If the applicant does not respond within this timescale, it is recorded as a refusal of the offer.

18.4 Applicants have one working day from the time of viewing to make a decision as to whether they wish to sign the tenancy.

18.5 Where adapted housing is provided, and the disabled person moves or dies, and the adapted housing is no longer needed by the remaining household, we will consult with the household to consider alternative housing options. Such allocations will be outside normal allocations routes and will be authorised by a member of the Executive Team. Where suitable alternative accommodation is offered and refused, we may seek to recover possession of the property by using Ground 9 of Schedule 2 of the Housing Act 1988.

18.6 We will ensure at sign-up that applicants are fully aware of their rights and responsibilities under the terms of their tenancy agreement.

19. MUTUAL EXCHANGES

19.1 Assured tenants are eligible to apply for permission to exchange their home for a property occupied by another of our tenants, or by a Local Authority or other registered provider. These will be dealt with under our Assignment, Mutual Exchange & Succession Policy, and Procedure. We will assist our customers to apply for exchanges using approved internet-based mutual exchange services.

19.2 Tenants will not be charged a fee for this service.

20. INFORMATION SHARING

20.1 We will develop information-sharing agreements with other local agencies to assist in joint working and in ensuring effective neighbourhood management. We will obtain applicants' consent before sharing any personal information. For more details on what information we hold and how we ensure it remains confidential, please see our Data Protection Policy.

21. RESPONSIBILITIES

21.1 The roles and responsibilities for key stakeholders across EPIC is detailed below.

21.2 The Executive is responsible for approving this Policy.

21.3 The Director of Housing Management is responsible for ensuring that the policy and procedure is effective and in line with legislation.

21.4 The Housing Manager is responsible for:

- 21.4.1 Developing and implementing operational procedures to deliver the policy objectives.
- 21.4.2 Embedding the policy through staff training, learning and development.
- 21.4.3 Monitoring the overall effectiveness of the policy, cost, quality and time.
- 21.4.4 Reporting to the management team on the operational effectiveness of the policy.
- 21.4.5 Evaluating, amending, and enhancing the delivery of the policy.

22. TRAINING

- 22.1 We will ensure that staff are aware of the contents of this policy and how to apply the policy and accompanying procedures.

23. DATA VALIDATION, REVIEW AND MONITORING

- 23.1 This policy is due for review in January 2024.

24. EQUALITY AND DIVERSITY IMPLICATIONS

- 24.1 We are committed to ensuring and promoting equality of opportunity for all. We are opposed to discrimination on any grounds, including race, religion, gender, marital status, sexual orientation, disability, age, or any unjustifiable criteria. We are committed to developing a culture that values people from all sections of society and the contribution which everyone can make. We will ensure our approach to accessing properties is considerate to people's individual needs. We also adhere to the Equality Act 2010.
- 24.2 EPIC Housing recognises that some people experience disadvantage due to their socio-economic circumstances and will strive to ensure no person or groups of persons is treated with injustice due to their personal circumstances. We will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make sure the central principles of the Human Rights Act (1998) will be adhered to.

25. ASSOCIATED DOCUMENTS/POLICIES

- 25.1 Assignment, Mutual Exchange and Succession Policy
Tenancy Agreement
Rent Arrears Policy
Guarantor Policy

Version Control

Date of Review	Reviewer	Version Number	Changes	Date of Next Review	Approved By
August 2023	Cindy Gleghorn	V2.0	Minor amendments to review of applications changed to annual. Changes to bedroom allocation.	January 2024	

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