

HOUSING ALLOCATION POLICY

A joint approach to housing in Argyll involving:



This policy is available in a range of languages and formats. Please contact any of the partner housing associations and we will be happy to assist.

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यह दस्तावेज़ यदि आपको किसी अन्य भाषा या अन्य रूप में चाहिये, या आपको आनुवाद-सेवाओं की आवश्यकता हो तो हमसे संपर्क करें

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یہ دستاویز اگر آپ کو کسی دیگر زبان یا دیگر شکل میں درکار ہو، یا اگر آپ کو ترجمان کی خدمات چاہئیں تو براۓ مہربانی ہم سے رابطہ کیجئے۔

Section One: Introduction

- 1.1 What is HOME Argyll?
- 1.2 About the HOME Argyll Partners
- 1.3 Compliance with legislative and regulatory framework

Section Two: Key Principles & Objectives

- 2.1 Partnership Working
- 2.2 Equality of Opportunity
- 2.3 Consistency
- 2.4 Openness and Accountability
- 2.5 Consultation
- 2.6 Confidentiality and Use of Information
- 2.7 Key Objectives

Section Three: Applying For Housing

- 3.1 Meeting Housing Need
 - 3.1.1 Equal Points
- 3.2 Reasonable Preference
- 3.3 Factors Not Taken Into Account
- 3.4 How To Apply
- 3.5 Provision of Information by Applicant
- 3.6 Verifying Applicants Circumstances
- 3.7 Tenancy References
- 3.8 Referrals
- 3.9 Local Connection
- 3.10 Health and Housing Needs Assessment
- 3.11 Employees and Committee Members
- 3.12 Removal and Suspension from the List
 - 3.12.1 Removal
 - 3.12.2 Suspension
- 3.13 Review of Waiting List

Section Four: Sustainable Communities

- 4.1 Use of Quota System
- 4.2 Location and Types of Housing
- 4.3 Accountable Discretion and Sensitive Lettings
- 4.4 House Size Eligibility
- 4.5 Choice and Offers of Accommodation
- 4.6 Mobility
 - 4.6.1 Internal Transfers
 - 4.6.2 Mutual Exchanges
 - 4.6.3 Management Transfers/Discretionary Priority
 - 4.6.4 Homeswapper

Section Five: Supporting Households in Urgent Need of Accommodation

- 5.1 Homeless/Potentially Homeless Applicants
 - 5.1.1 Section 5 of Housing (Scotland) Act 2001
 - 5.1.2 Homeless Allocation Quotas
 - 5.1.3 Homeless Applicants – with Support Needs
 - 5.1.4 Local Connection
- 5.2 Domestic Abuse and Harassment
 - 5.2.1 Domestic Violence
 - 5.2.2 Harassment
 - 5.2.3 Homeless Status
- 5.3 Relationship Breakdown

Section Six: Supporting Independent Living

- 6.1 Gathering Information on Support Needs
- 6.2 Receiving Referrals From Other Agencies
- 6.3 Recording Decisions About Housing Support
- 6.4 Throughcare/Aftercare
- 6.5 Extra Care Housing (inc Jura Care Centre)
- 6.6 Move On Accommodation

Section Seven: Customer Service

- 7.1 Information and Advice
- 7.2 Training
- 7.3 Performance Monitoring
- 7.4 Promoting HOME Argyll
- 7.5 Appeals and Complaints

Appendix 1: Points Categories

Appendix 2: Common Assessment of Need

1 Introduction

1.1 What is HOME Argyll?

HOME (Housing Options Made easy) Argyll is a partnership approach to housing in Argyll involving:

- Argyll Community Housing Association
- Dunbritton Housing Association
- Fyne Homes
- West Highland Housing Association
- Argyll and Bute Council – Homeless Department

It is a way of making it easier for people to find housing in Argyll and Bute and focuses on providing better housing information and advice to all. Applicants seeking social rented housing in Argyll and Bute can apply to the housing associations using a single application form, and will be prioritised according to our shared allocation policy. Co-ordinated information and advice about housing options is available from each partner and on our website www.homeargyll.co.uk

The central aim of each housing association is to provide and maintain affordable rented and low cost ownership housing options for people in housing need.

1.2 About the HOME Argyll partners

All the partners operate in Argyll and Bute.

Argyll Community Housing Association: is the largest Housing Association in Argyll and Bute and has accommodation across the whole local authority area. Most properties are general needs homes, but the Association also has sheltered housing for older people and some amenity housing.

Dunbritton Housing Association: has properties in the Helensburgh and Lomond area. Again most are general needs homes, but there are also a small number of amenity and wheelchair accessible properties. The Association has one office, located in Dumbarton. Dunbritton HA also has properties available in West Dunbartonshire. Please contact the association directly for more information on these properties.

Fyne Homes: is the second largest Housing Association in Argyll and Bute. It has properties in Mid Argyll, the Cowal and Kintyre Peninsulas and on the Isle of Bute, The Association has four offices located in Rothesay, Lochgilphead, Dunoon and Campbeltown.

West Highland Housing Association: the Association has properties in the northern areas of Argyll and Bute and many in the Argyllshire islands. The majority of properties are in Oban and the Isle of Mull. A small number of properties are located in rural settlements in Lorn, Islay, Jura and Colonsay. Most of the stock is for general needs with only a very small number of amenity properties.

July 2009 consultation draft

For detailed information on the type and location of housing which we have please refer to the 'Applicant Information Booklet' which is available from any of our offices. Information is also available online on our website: www.homeargyll.co.uk

Argyll and Bute Council: the Council no longer holds housing stock for rent, but retains the responsibility to assess applications from households who are homeless or threatened with homelessness. **PLEASE NOTE** that the current legislation relating to applicants applying as homeless differs from that relating to mainstream housing applications.

Argyll and Bute Council continue to exercise the power to investigate local connection to the Argyll and Bute area and have a duty to secure permanent accommodation for those households who are assessed as unintentionally homeless, in priority need and with a relevant local connection to this area.

Area Homeless Teams in Bute, Cowal, Kintyre, Mid Argyll, Lomond and Lorn are able to provide information and advice on all housing options for homeless applicants and those threatened with homelessness.

Associate Members

Cairn Housing Association: is a national registered social landlord and manages over 3000 properties across Scotland. The Association has a sheltered complex in Campbeltown which provides housing support to an elderly client group.

1.3 Compliance with legislative and regulatory framework

The four landlord partners are all registered as Registered Social Landlords (RSLs) with The Scottish Government, which regulates and monitors the activities of all RSLs. This policy complies with best practice produced by The Scottish Housing Regulator, the Scottish Federation of Housing Associations and the Chartered Institute of Housing.

The relevant Performance Standards are:

GS2.1	<i>Equal Opportunitites</i>
AS1.1	<i>Access to Housing</i>
AS1.2	<i>Lettings</i>
AS1.4	<i>Housing Support</i>
AS4.7	<i>Appeals</i>
AS4.10	<i>Accommodation Provision</i>

This policy also adheres to the legal requirements contained within:

- The Housing (Scotland) Act 2001, including the National Standards for Information and Advice
- The Housing (Scotland) Act 1987
- The Homelessness (Scotland) Act 2003
- The Matrimonial Homes (Family Protection) (Scotland) Act 1981
- The Race Relations Act 1976

July 2009 consultation draft

- The Race Relations (Amendment) Act 2000
- The Disability Discrimination Act 1995
- The Sex Discrimination Act 1975
- The Data Protection Act 1998
- The Access to Personal Information (Housing) (Scotland) Regulations 1993
- The Human Rights Act 1998

And each of the partners Internal Management Plans and Risk Assessment Policies.

2 Key Principles

2.1 Partnership Working

This policy has been developed by the five partners with the central aim of working together to simplify and maximise access to housing in Argyll and Bute. This has been achieved via the implementation of a single application form and common allocation policy. We continue to work together and with other organisations to identify and alleviate housing need in Argyll and Bute.

2.2 Equality of Opportunity

All partners are committed to equality of opportunity, and will ensure that in implementing this policy we will not unfairly discriminate against any individual, household or group on grounds of race, gender, sex, marital status, sexual or political orientation, religious belief, language, social origin, disability, age or other personal attribute. We will ensure that this policy is made available in alternative formats on request such as large print, tape, Braille or community languages and that we have access to interpretation services on request.

2.3 Consistency

We will apply this policy in a consistent manner across our area of operation so all applicants are treated in a similar way.

2.4 Openness and Accountability

This policy will be a published document, available for public use and, when requested, will be made available in other languages, in Braille, in large print or on audiocassette. We will also offer all applicants the opportunity to discuss their application and the allocations process where necessary. They will also be informed of the appeals and complaints processes. In order to facilitate the above, we will maintain clear audit trails which will allow us to demonstrate how and why any given allocation was made to a particular household, with due regard to data protection legislation.

2.5 Consultation

Consultation and discussion is invaluable in allowing us to achieve a policy and working procedures that will deliver, as far as possible, what our service users want

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and need. We will therefore consult with service users on all reviews of this policy in accordance with the Housing (Scotland) Act 2001.

2.6 Confidentiality and Use of Information

The confidentiality of information gathered as part of the allocations process is recognised, and all applicants will be informed clearly of the way in which the information provided will be used and of their right to inspect any record kept by the HOME Argyll partners in relation to their application. There may be a small administration charge levied for obtaining this information.

Applicant information may be shared between HOME Argyll partner organisations and other agencies (such as the police or social work service) and all applicants will be made aware of this at the point of application and asked to sign their consent to this.

2.7 Key Objectives

All partners have agreed that there are several overarching objectives that we are trying to achieve with HOME Argyll and our common allocation policy, these being:

- *To provide quality, affordable housing for those in housing need.*
- *To create and maintain sustainable communities where people want to live.*
- *To offer a range of mobility options to social rented tenants to suit their changing needs.*
- *To ensure that all those who are in urgent need of rehousing receive fair and open access to our housing and that their needs are met as quickly and as appropriately as possible.*
- *To provide accommodation which enables independent living and the integration of those with support needs into our communities.*
- *To ensure that all applicants receive co-ordinated high quality information and advice which enables them to make informed choices about their housing options*
- *To ensure that all our staff are continuously trained on all aspects of this policy and related legislation*
- *To ensure that we have a robust system in place for monitoring our performance against the objectives and targets set in this policy*
- *To have a clear strategy for publicising HOME Argyll*
- *To ensure we have a robust system in place for customers who are unhappy with the service they receive to either appeal a decision or make a complaint as appropriate.*

July 2009 consultation draft

3.0 Applying For Housing

3.1 Meeting Housing Need

Our principal aim is to provide affordable, good, quality accommodation for people in housing need. This policy therefore focuses on prioritising allocations to people with high levels of identified housing requirements. The needs are split into seven categories which attract different points depending on the priority given to the category. Each application is assessed and allocated the relevant points as per their circumstances. The categories we are currently using and their respective points are attached as part of **appendix 1** to this policy.

Anyone aged 16 or over can apply directly to any of the partner landlords for accommodation and has the right to have their needs assessed. The common application form means that applicants only need to complete one form to apply to any or all of the four partner landlords. There are a number of other options for existing tenants in terms of their changing needs and these are discussed further in **section 4.6** below.

3.1.1 Equal Points

Where applicants have equal points, priority will firstly be determined based on the criteria set out in **section 4.3** below.

Where applicants continue to demonstrate equal priority, priority will then be given to any applicant demonstrating that they require to live in the area because they, or a household member:

- is employed or has been offered employment in the area
- wishes to live in the area to seek employment
- wishes to live in the area to be near a relative or carer
- has special social or medical reasons for needing to be housed within the area
- wishes to move to the area because of harassment
- wishes to move to the area because of domestic violence

No account will be taken of whether an applicant is resident in the area.

Where applicants continue to demonstrate equal priority, a decision will be made based on time in housing need.

3.2 Reasonable Preference

We must give reasonable preference to applicants who are:

- homeless or threatened with homelessness;
- living in housing below the tolerable standard;
- living in overcrowded houses or in large families;
- living in unsatisfactory housing conditions.

July 2009 consultation draft

See **Appendix 2** for further details of the needs categories and how we assess them. For further information on Homelessness assessments please see section 5 below.

3.3 Factors Not Taken Into Account

We must ignore the following matters when allocating houses:

- Length of time applicants have resided in our area of operation (unless applying under the terms of the current Homelessness legislation)
- any non housing debts e.g. Council Tax
- tenancy related debts – rent or service arrears, rechargeable repairs – which are less than 1/12th of annual amount payable, or which are no longer outstanding, or where a repayment plan has been arranged and kept by the applicant for at least three months
- household debts for which the applicant/s are not liable
- the income of the applicant and their family (including welfare benefits). The only exception to this is where we receive an application for a shared ownership or a shared equity property
- the value of any property or properties owned by the applicant or applicant's family. Again, the exception being an application for a Homestake property
- the age of the applicant, except in the allocation of houses which have been designed or substantially adapted for occupation by persons of a particular age group e.g. sheltered housing

3.4 How to Apply

All applicants should complete the common application form, which can be obtained from any of the partner associations' offices. This application form gathers information on personal and housing circumstances, as well as preferences for area and type of accommodation required by the applicant. Where required, RSL staff will assist applicants in completing the application form. Forms can be provided on request in different languages and formats to meet individual needs.

All applications received will be held in the HOME Argyll common database.

Where a joint application comes from households, or individuals, currently living at different addresses and who wish to be rehoused together there will be one application held and the points awarded will be based on the household which attracts the higher number of points.

3.5 Provision of information by Applicant

The provision of accurate, up to date information on the applicant's circumstances is vital to the housing need assessment and allocation procedure. Where applicants fail to provide this information they may be suspended or removed from the common housing list as detailed in **section 3.12**. We will not ask an applicant to provide information to us, which has significant financial implications for the applicant.

Applicants must advise one of the partner RSLs of any change in circumstances relating to their housing application, or if they wish to change their areas or house type

July 2009 consultation draft

previously selected. Changes in circumstances may have an impact on the number of points received, and any change in points awarded will take effect from the date that we are informed of these changes. This will ensure the applicants are appropriately placed on the waiting list.

If we believe that an applicant has intentionally changed their circumstances in order to secure a higher position on the waiting list, we may assess this application as if this change in circumstances had not occurred.

3.6 Verifying Applicant's Circumstances

To ensure that we accurately assess the housing needs of applicants, we generally need applicants in the following circumstances to provide some verification, as outlined below:

Circumstance	Proof Required
All applicants	<i>Proof of identity – verification required prior to allocation</i>
All Household members	<i>Proof of Residency – verification is required prior to allocation</i>
Homeless or threatened with homelessness	<i>Assessment undertaken by homelessness advisor (Argyll and Bute Council)</i>
Asked to leave current accommodation	<i>Copy of valid Notice to Quit</i>
Moving to be near essential education	<i>Letter from educational establishment</i>
Moving to be near employment/ incoming worker	<i>Letter from employer/ future employer</i>
Moving to provide/ receive support	<i>Letter from person receiving/ providing support</i>
In need of rehousing as health affected by current housing circumstances	<i>Health and housing assessment undertaken</i>
Access arrangements	<i>Letter from child's other parent, or Letter from a lawyer</i>
Foster Carers	<i>Letter verifying status from Social Work Dept.</i>
Household member temporarily living away from home	<i>Letter from this individual confirming they wish to be considered part of the household</i>
Domestic Abuse	<i>Position of belief</i>
Experiencing harassment	<i>Would look for corroborating evidence e.g. police, social work reports etc</i>
Pregnancy	<i>Mat V1 form or similar</i>

We recognise that in some cases the information required may be sensitive and of a personal nature. In such circumstances, we will adopt a position of belief and trust. With regard to general proof of identity required the applicant should give one of the partner landlords' sight of an appropriate document such as a utilities bill, prior to allocation.

All applicants will also be asked to provide their National Insurance number. This will be used as a unique identifier for each applicant – enabling us to identify any duplicate applications and quickly identify individual applications. Applicants will be asked to provide their NI number when contacting any of the associations for information about their application by phone, to ensure security of individual information. As not everyone

July 2009 consultation draft

will have an NI number, providing this information will not be a requirement of making an application, and another identifier will be used for these applicants.

3.7 Tenancy references

We will require contact details for previous landlords (if appropriate) in the past five years. Landlords will be contacted and asked to complete a tenancy reference form. If this reference identifies rent arrears, anti-social behaviour or breach of tenancy agreement, applicants may be suspended according to this policy.

3.8 Referrals

In some cases, partner landlords have arrangements with other local organisations to take referrals. These can apply to a particular development designed for people with support needs, or to the allocation of mainstream housing. Further information is available on our website: www.homeargyll.org or from any of the partners.

3.9 Local Connection

Applications from those living outwith the Argyll area will be assessed using the normal assessment procedure set out in this policy, and points allocated accordingly.

Connection with the local area (as defined in the Housing [Scotland] Act 2001) will only be considered as a factor where applicants have equal priority for housing. In determining local connection, no account will be taken of whether an applicant is resident in the area. ***See section 3.1.1.***

3.10 Health and housing need assessment

In cases where an applicant's health is affected by their current housing circumstances, they will be asked to complete a 'Health and Housing Need' form which will be assessed by one of the partner landlords. Our target for assessing Health and Housing Need will be 20 working days. We will not normally ask an applicant to provide additional information from a medical specialist if any charges apply.

It is important to note that priority will not be given based on the medical condition of the applicant and their household, but based on whether a move could alleviate the health problems experienced.

Where a household has more than one person with health issues, points will be awarded on the basis of the applicant with the highest need.

3.11 Employees and committee members

We do not exclude any employee, former employee, committee member, close relatives of employees or committee members or former staff or committee members from applying for a tenancy, transfer of tenancy or mutual exchange. These individuals must apply through the normal application process, will be subject to the same assessment procedure and will be allocated housing based on their housing need as assessed through the allocation policy. The individual concerned or any close relative will have no

July 2009 consultation draft

involvement in or influence over the process by which the association concerned allocates the tenancy, transfer or exchange. The allocation of a tenancy must be carried out according to the individual RSL's procedures for dealing with Schedule 7 of the Housing (Scotland) Act 2001.

3.12 Removal and suspension of applications from the housing list

We aim to minimise suspension and removal of applications from the housing list. However, there are some circumstances where it is necessary to remove applications from the list, either temporarily or permanently.

3.12.1 Removal

There are only three ways in which an application can be removed from the Association's housing list:

- **where the applicant has died or**
- **has requested removal (in writing) from the list or**
- **fails to respond to a periodic review of the housing list e.g. legitimate mail returned and no further contact details available**

Applications which are cancelled due to a waiting list review can be reinstated as at the original application date if the applicant successfully appeals the cancellation within one month. Otherwise, a new HOME Argyll form would have to be completed.

3.12.2 Suspension

Suspension from the common waiting list can only occur in certain circumstances, and means that the applicant will not be offered accommodation while suspended, even if they demonstrate housing need. The circumstances, which can result in an application being suspended, are:

- **where there are significant, outstanding and unresolved rent arrears until such arrears are either resolved or an agreement has been set up and adhered to for a period of at least three months**
- **where there is evidence of previous serious anti social behaviour or harassment being perpetrated – each case will be treated individually and account will be taken of the severity of the behaviour, when it happened, any mitigating factors – there will not be a set time limit for suspensions under this category and applicants will be notified individually of time scales**
- **provision of false or misleading information – suspension for 6 months**
- **asylum seekers** (whilst still subject to immigration control can't be offered permanent accommodation)
- **any violence or aggression towards staff will be dealt with according to the policies of the individual RSL's**
- **deliberately worsening housing conditions – suspensions in this case will be for 6 months unless the applicants circumstances change in the meantime when their application will be reassessed**
- **support not in place – the application will be suspended until such times as the support is in place**

July 2009 consultation draft

- **property condition breaching tenancy agreement** – suspension will be until the breach has been remedied
- **High Risk Offenders will be dealt with in line with the MAPP (Multi Agency Public Protection Arrangements) Protocol**
- **When an applicant refuses two reasonable offers of housing within 1 year – suspension will be for 6 months in this case. NB. If applicants housing circumstances worsen during the suspension period, then the application will be reassessed.**

Applications may also be suspended from the list voluntarily, if applicants wish to defer their application until such a time as they require rehousing. This will be particularly relevant for those living in tied accommodation and in the HM Forces. This will generally need to be expressed in writing to clarify the intentions of the applicant.

Suspended applicants will receive a letter setting out the reason for their suspension, the length of the suspension, action they can take to resolve this and their right to appeal. Suspensions will be reviewed on a regular basis.

Each partner association will monitor the number of suspensions made from the housing list, and the impact of these, on an ongoing basis. This information will be used to assess the effectiveness of this aspect of the allocation policy.

3.13 Review of Waiting List

The common waiting list will be reviewed on an annual rolling basis, with all applicants asked to confirm that the information held by HOME Argyll is up to date and accurate.

The aim of this review is to ensure a response from as many applicants as possible, and as such, applicants will be offered a range of ways in which to provide up to date information e.g. telephone, letter, email, website etc. The review will also be used as an opportunity to update applicants on their current position regarding housing allocation, and to inform them of their housing prospects with each partner RSL.

Where applicants fail to respond to this review, they will be removed from the common housing list. All applicants will be informed of the implications of failing to respond to the review, and will receive confirmation of their removal from the list in writing. Circumstances in which an application can be removed from Home Argyll are discussed in **section 3.12.1** above.

4.0 Sustainable Communities

One of the main aims of introducing the Argyll & Bute Common Housing Register was to help make best use of our collective stock, which is a limited resource, through making it much easier for applicants to access different types of housing without having to fill in multiple forms and be on several different waiting lists.

Having only one common database for everyone who wants to be housed in Argyll & Bute makes it much easier to match applicants to the social rented housing available at any given time. This means that applicants have a much better chance of being offered the type of accommodation that suits their particular needs.

July 2009 consultation draft

This is a key objective for us as experience shows quite clearly that when people are living in properties that suit their needs, in an area they want to live in, they are far more likely to stay there and this in turn helps to keep that community viable for both current and future generations.

4.1 Sustainable communities and use of a quota system

This policy is designed to give priority to those applicants in the greatest housing need. However, in order to ensure that we are working towards sustaining communities by giving households the chance to move either within their own or to another community, we use three broad groupings of applicants and allocate houses amongst these groups on a quota basis to ensure a level of mobility for each group.

The current groups and quotas are:

Grouping	Quota
Homeless applicants (eligible for permanent housing)	50 % of all allocations where possible
Transfer applicants	Up to 25% of all allocations
General waiting list applicants	Approximately 25% of all allocations

These quotas have been introduced to ensure that the needs of statutorily homeless applicants are met, and have been developed in conjunction with Argyll and Bute Council Homeless Service. The quotas will be monitored on a regular basis and reviewed accordingly.

4.2 Location and types of housing

Normally, there is no restriction on the location or type of accommodation for which an applicant may apply. However, some types of housing are designed for a particular client group – e.g. sheltered/amenity housing for older people – and it would only be that group of people who could apply for that particular housing.

Furthermore, some applicants may attract points for one or more of the priority categories but these might not apply to every property e.g. if someone was awarded medical points because they could not manage stairs, these points would only apply if they were to be moved to a ground floor property. If they decided to accept a higher level of property, the medical points would not count towards this.

Applicants will receive information and advice to allow them to make informed choices relating to housing type and location.

In some cases, applicants may seek housing in an area where there is currently no social rented housing or a very limited number of houses. We would encourage individuals to make an application specifying this in order to help with future planning of new developments. All partners aim to build new housing which is appropriate to the needs expressed by applicants, as well as being developed in consultation with local communities.

July 2009 consultation draft

4.3 Accountable discretion and sensitive lettings

In the interest of achieving balanced and sustainable communities and making most effective use of housing stock, the process of matching applicants to properties will require a level of discretion in order to:

- **match people with appropriate properties** – for example to ensure that physical mobility needs are met and adapted properties allocated appropriately
- **house people in appropriate locations** - for example to ensure that older people or households with young children are close to transport links and/or schools
- **avoid potential clashes of lifestyle** - based on analysis of the circumstances of individual applicants rather than generalisations
- **avoiding over concentrations of household type** – for example avoiding high levels of child density or unduly high proportion of vulnerable people in one area, estate, street or close
- **Ensure the quotas are being achieved between the three lists** – for example, discretion has to be exercised in deciding which list to allocate a vacancy from.

To ensure a clear and accountable audit trail in allocations each partner association must ensure that every provisional offer and allocation made is countersigned by two members of staff.

4.4 House size eligibility

We aim to make best use of our housing stock, and applicants will be eligible for a particular size of house based on the size of their household. The basic guidelines for this are:

- One bedroom for each single parent or couple
- One bedroom for each further adult aged 16 or over
- One bedroom for every two children of the same sex aged under 16
- One bedroom for every two children of different sex aged over 8
- Children of the same sex aged under 16 but with more than six years age difference will not be expected to share a room.
- Expectant mothers may be eligible for one extra bedroom depending on the number and ages of children already in their household.

We realise that applicants' circumstances can vary and that some households may require a larger property than they are eligible for, for various reasons. We will therefore assess each application individually to ensure that households are being considered for a property that suits their needs. Examples of when we may consider allocating a larger property are:

- **Where there is a medical reason for requiring a separate or additional bedroom** – this will be considered on an individual basis through our joint health and housing need assessment procedures.
- **Where a separated spouse has access rights to a child/children** – then we would normally allow the applicant one additional bedroom to be used by the child/children during access. Individual circumstances can be taken into account. Any specific requirements should be discussed with one of the partner RSLs.

July 2009 consultation draft

- **Where there is no stock of a suitable size** – in some areas, where landlords do not own properties of a smaller size, smaller households may be entitled to be considered for a larger property.
- **Where applicants request an extra bedroom** – applicants may request a property one size larger than they are eligible for. This will result in lower priority for this house size, with those who *need* this size of property being considered before those who *choose* to request an extra bedroom but don't actually need it. Applicants will be advised that they are less likely to be offered accommodation if they request a larger size than they are entitled to under our policy.

In exceptional circumstances, we may consider offering a household a property which is smaller than they are entitled to – this would only occur if there were no or only a very limited stock of properties of a suitable size in the area they wished to live and also only if the move would improve the situation they were currently living in.

4.5 Choice and offers of accommodation

In the past we have deliberately not put a limit on the number of offers an applicant can receive unless they are priority homeless (where they have two reasonable offers), as we wanted to give as much choice and flexibility as possible.

We have found however, that because of the small turnover of our stock compared to the numbers of people waiting for suitable accommodation in Argyll & Bute, this system is no longer practical for us to operate. Even more important though is that fact that one of the key principles underlying this policy is to ensure everyone has equal opportunity to our houses. As we currently restrict homeless applicants to two offers we feel that it is unfair to potentially disadvantage them over other applicants who are currently able to receive multiple offers.

We have agreed therefore that from the date this policy is approved, we will limit all applicants to two reasonable offers of housing within 1 year. *NB: An offer will normally be considered reasonable if it is situated in an acceptable area as specified by the applicant and otherwise meets the applicants stated housing need as detailed on the application form.*

In the interests of being open and accountable we will ensure that all current applicants are advised of this change and we will give extra assistance, either by phone or by post, to those who have chosen several areas, to narrow down their choice based on information and advice tailored for their personal circumstances. This will help our applicants make more informed choices about where they want to live and in turn should decrease our instances of rejected offers. To ensure that future applicants also benefit from this, we are preparing a comprehensive information leaflet to supplement our application packs. These will give much more information about the areas we operate in so that they can make more informed choices.

Furthermore, if an applicant refuses a reasonable offer of accommodation, they will be invited to attend a meeting with one of the partner organisations to make sure that all the information we hold on their area choices etc is correct so we can refine their choices. If a subsequent reasonable offer is refused, the applicant will be suspended from the list for a period of 6 months. If their housing circumstances worsen during this time, we will reassess their application.

July 2009 consultation draft

For the avoidance of doubt, all applicants will be treated as if their next offer after the date this policy is adopted is their first.

4.6 Mobility

Whilst every attempt is made to ensure that the accommodation we provide is suited to each applicant's needs, we realise that over time these needs might change. This policy therefore is designed to offer a range of options to assist tenants already in social rented accommodation – either in Argyll and Bute or elsewhere – to move home as their household needs change.

4.6.1 Internal Transfers

Tenants of one of the HOME Argyll partners can apply to transfer to another property which better meets their needs. Tenants can transfer to a property owned by their existing landlord or they can request a move to another property owned by one of the partner landlords. Transfer applicants need to also complete the common application form. There is no qualifying time period attached to this. However, a transfer would not be considered to a property that would not improve the applicants housing situation as per this policy.

In order to ensure mobility and best use of housing stock, we each aim to make a number of our empty properties available to transfer applicants. The number of properties that are made available for transfer may change over time and differ between the Associations. The current quotas are detailed in **section 4.1** above.

For the avoidance of doubt, any existing HOME Argyll tenant who does not have a full Scottish Secure Tenancy (SST) will be considered under the direct waiting list rather than the transfer list.

4.6.2 Mutual exchanges

Another option for existing tenants who need to move because their needs have changed is to request a Mutual Exchange. This is when two tenants, with the approval of their landlords, agree to swap houses. The exchange can be with another tenant of the same landlord or with a tenant of one of the partner landlords, other RSLs both locally and nationally, and local authority tenants throughout the UK.

All partners in HOME Argyll will do their best to comply with such requests unless there are reasonable grounds to refuse (as per the Housing (Scotland) Act 2001), such as:

- the property is subject to proceedings for recovery of possession
- the exchange would mean that a property designed or adapted for occupation by someone with special needs was no longer occupied by a person with these needs
- the exchange would lead to either overcrowding or one household living in a property substantially larger than required
- the exchange would result in tenants being accommodated in a property which is not suitable to their needs

July 2009 consultation draft

A tenant wishing to apply for a mutual exchange can do so using the common application form.

4.6.3 Management Transfers/Discretionary Priority

This policy has been developed with the aim of enabling accurate assessment of the housing needs of the vast majority of applicants. However, we recognise that there may be specific, individual circumstances where applicants have a clear and/or urgent housing need but this is not accounted for within the usual assessment of need as set out in this policy. As such, there is provision within this policy for 'discretionary priority' to be given to such applicants so that they may be considered for an internal management transfer to another property within the partner landlords'.

Cases of discretionary priority will be initially approved by a senior member of staff within the partner association concerned, and then by the association's Committee or a relevant sub Committee (retrospective approval). Decisions on discretionary allocations will be fully recorded and monitored. Where more than one similar circumstance arises which requires discretionary priority to apply, we will review the allocation policy and adapt the points system accordingly.

4.6.4 Homeswapper

Homeswapper is the largest national mutual exchange facility that can be accessed by individuals who are looking to move to another area. Any social tenant can register with Homeswapper and there is a membership fee of £6.75 (current at March 2009) for three months registration. Homeswapper automatically searches daily for potential swaps and sends out alerts twice a week to tenant members. Contact any HOMEArgyll partner for further information.

5.0 Supporting households in urgent need of accommodation

We recognise that there will be times when households may require to be housed as a matter of urgency. Our points schedule is therefore designed to ensure that these situations, as far as we can manage, are dealt with as priority cases. Details are given below of the circumstances which qualify for urgent rehousing and how we will approach them.

5.1 Homeless/Potentially Homeless Applicants

All households identified as homeless or who are under threat of homelessness should apply to the partner landlords using the common application form. They will be offered an interview with Argyll and Bute Council Homeless Service who will assess their circumstances and they will be informed of the outcome of their application in writing.

Argyll and Bute Council will determine whether the applicant/household is:

- Homeless, as defined by legislation and
- has a *priority need* for assistance
- has become homeless intentionally

July 2009 consultation draft

- has a relevant local connection to Argyll and Bute

HOMEArgyll partner landlords will also be informed of the outcome of the assessment (including the decision on intentionality and local connection) in order that the relevant points may be awarded.

Applicants who are assessed as unintentionally homeless AND with a priority need, AND local connection will be entitled to permanent accommodation within Argyll and Bute, and will attract 200 points under Category One in this policy (see appendix 1).

NB: Anyone attracting points from Category One will not be entitled to points from the other categories and will be awarded 200 points only.

Applicants who are assessed as intentionally homeless OR who have no priority need will attract points under category 7. These applicants may attract points from other categories also.

Please see **appendix 1** for a full list of categories and points.

Applicants who are assessed as

- NOT homeless, or
- unintentionally homeless with a priority need, BUT with no relevant local connection to Argyll and Bute

will not be awarded any extra points as a result of their homeless application, but may still apply direct to HOMEArgyll and will be awarded points according to their circumstances

In certain circumstances – for example where an applicant is experiencing domestic abuse – priority is offered within our allocation policy without requiring the applicant to undergo a homelessness assessment.

5.1.1 Section 5 of the Housing (Scotland) Act 2001

Section 5 of the Housing (Scotland) Act 2001 gives Argyll and Bute Council the power to make Section 5 homeless referrals to RSL's and RSL partners have a duty to comply with these referrals where they are made.

However, as HOME Argyll gives statutorily homeless applicants Category 1 points which gives them reasonable preference within the policy and ensures that they are treated the same as all other applicants, this means that we can reduce the number of Section 5 homeless referrals required.

Furthermore, as at least 50% of all HOME Argyll's lets must be to homeless applicants (see section 3.4.3 below), then Argyll & Bute Council should only have to make a Section 5 homeless referral where it is not able to discharge its duty in terms of the Homelessness (Scotland) Act 2003.

Argyll and Bute Council does however reserve the right to make Section 5 homeless referrals as appropriate, meaning that Section 5 homeless referrals can act as a last resort to ensure that statutorily homeless applicants do receive at least one reasonable offer of accommodation. We recognise that in some situations, Section 5 homeless

July 2009 consultation draft

referrals can be used even if we have met our quota of 50 per cent of allocations going to statutorily homeless households.

If a homeless or potentially homeless applicant refuses a reasonable offer of accommodation, they will be asked to meet with the Homelessness Service to discuss their housing options. This discussion could act as a trigger for a Section 5 homeless referral if appropriate. If the applicant then refuses their offer of accommodation through the Section 5 homeless process, they will be re-assessed by the partner landlords according to this allocations policy, but without homeless priority.

5.1.2 Homeless Allocation Quotas

All applicants assessed as homeless and who meet the unintentionality, priority need and local connection criteria, will be held on a separate housing list, and 50 per cent of all HOME Argyll allocations will go to homeless households. This quota has been agreed based on assessment of the historical number of homeless households requiring permanent accommodation, and has been agreed jointly between the RSLs and Argyll and Bute Council Homelessness Service.

5.1.3 Homeless applicants (awarded Category One points) with support needs

All partners will work jointly with Argyll and Bute Council to ensure that the support needs of homeless applicants are identified and arranged. Part of the local authority homelessness assessment procedure involves the consideration of support requirements, and making arrangements for the necessary support to be put in place. We will work with the Council to ensure that accommodation provided fits appropriately with the support needs of the applicant. The Homeless Service is committed to ensuring that homeless applicants identified as being in need of support are not referred to landlords unless appropriate support is in place.

5.1.4 Local Connection

The local connection criteria for Homeless applications is defined by legislation. Local authorities have a power, but not a duty, to investigate local connection. Due to the high demand for social housing in this area, Argyll and Bute Council continues to exercise the power to investigate local connection and will consider this in their assessment of homeless applications.

5.2 Domestic Abuse and Harassment

We believe that all individuals have a right to a life free from harassment, violence and abuse, and are committed to enabling those experiencing this type of difficulty to address this through suitable housing. We know that there are many forms of harassment and abuse and we will approach each situation from a position of belief, and will adopt sensitivity in dealing with applicants.

July 2009 consultation draft

In recognition that the victim of abuse should not be penalised because of harassment, all applicants experiencing harassment, violence or abuse will be made aware of their right to either stay in their own home safely or to seek alternative accommodation. Where applicants elect to stay in their own homes, they will be referred (with consent) to the relevant organisation for assistance and support.

5.2.1 Domestic violence

Where people are experiencing violence (whether they are female or male) within the home we recognise that this presents an immediate housing need and as such will award all applicants who are victims of domestic violence the same level of priority as that of homeless applicants. Applicants affected by domestic violence will be advised that they may seek assistance from Argyll & Bute Council's Homelessness Service. The safety of the applicant will be the first priority, with confidentiality of information provided being particularly important in these cases.

Applicants who are victims of domestic violence will in no way be penalised for any repeat applications for housing, as we recognise the difficulty involved in leaving the home in many cases. Applicants will be signposted to other sources of support such as Women's Aid and other relevant organisations which are able to provide assistance and support.

5.2.2 Harassment

Harassment at or near the home is a serious problem and includes not only physical attacks and damage to property, but also verbal abuse and other behaviour which deprives people of the enjoyment of their homes on the grounds of a personal attribute such as gender, racial origin, sexuality, age, disability or other factor. We aim to counter all such harassment, and in addition to attempting to re-house victims where this is their wish, victims of harassment will also be signposted to other relevant sources of support and advice who may be able to assist, such as the local authority, the police and voluntary and community organisations.

All applicants whose household is specifically affected by harassment will be assessed on an individual basis, and every attempt will be made to take effective action to prevent any harm occurring to the applicant and his or her household. Victims of harassment are offered a significant degree of priority within our allocations policy.

5.2.3 Homeless status

All applicants experiencing harassment, violence or abuse will be given the opportunity to meet with local authority homelessness staff for a homelessness assessment. Applicants will not, however, be required to undergo an assessment in order to receive priority for re-housing.

5.3 Relationship breakdown

If a relationship breakdown has occurred in a tenancy, we would firstly advise both parties to seek legal advice on the entitlement to the tenancy. Either partner would then be able to apply separately and be considered as a waiting list applicant. For the avoidance of doubt, any such application would be admitted to the direct waiting list.

6.0 Supporting Independent Living

We are committed to providing accommodation which enables independent living and the integration of people with support needs into the community. This could include people with learning difficulties, physical disabilities, mental health issues, dependency (i.e. drug and or alcohol) issues and vulnerable young or older people. In all cases we will work jointly with appropriate agencies and organisations to ensure that applicants receive appropriate support to sustain their tenancy.

All landlords have a range of properties designed for people with particular needs. This includes:

- Amenity housing
- Sheltered housing
- Housing for people with physical disabilities
- Housing with aids or adaptations
- Designated special needs housing

Applicants apply for all types of housing using the common application form and are prioritised according to this allocation policy.

6.1 Gathering Information on Support Needs

If the applicant indicates that accommodation with assistance is required, we will work with each individual to determine the availability of this support. This may also involve liaison with other agencies as appropriate. In particular, close working with the Argyll and Bute Council's Social Work Service will be critical to establishing need for and availability of support.

All applicants will also be advised of their right to receive a Single Shared Assessment free of charge from Argyll and Bute Council Social Work Teams.

6.2 Receiving referrals from other agencies

All partners work with a number of public and voluntary agencies to provide accommodation to households in need of support. The Homelessness Service is committed to ensuring that applicants with support needs are not referred to partner RSLs until a support package is in place.

In most cases, accommodation will only be offered where it is clear that support needs will be met – through confirmation in writing from a relevant organisation such as Social Work, the Homelessness Service or the support provider. Although every effort will be made to work with other agencies to ensure that support is in place, applicants assessed as in need of support but without a support package may be suspended until such a time as the support is available. This will be used as a last resort, with all efforts made to work with the applicant to ensure that adequate support is available.

6.3 Recording decisions about housing support

July 2009 consultation draft

The separation between housing and support provision can cause difficulties, and in some cases it may be difficult for us to be confident that adequate support is available to create a sustainable tenancy. In many cases, decisions about whether to allocate properties without support being available will be based on judgements made by staff about apparent support needs, and efforts made to ascertain whether that support can be provided locally. As a result, we will ensure that all decisions which are taken regarding allocation of property to applicants with support needs are approved by senior staff and clearly recorded.

6.4 Throughcare/Aftercare

As aforementioned, we are committed to providing accommodation which enables independent living. This includes vulnerable young people particularly those who are leaving care. We want to ensure that Looked After and Accommodated Children (LAAC) subject of the Children (Scotland) Act 1995 are given the best possible opportunity to make the transition from a care setting to their own tenancy.

As such we have taken this opportunity to make a commitment to this group of applicants to make the whole process easier for them by creating a specific heading under category 1 which means that they will automatically be awarded 200 points and put on the waiting list as soon as they turn 16.

6.5 Extra Care Housing (Including Jura Care Centre)

Applicants for the above

- must be 65 or over with some level of mobility problems/poor fitness OR have a high level of physical disability or mobility problems
- AND must have a relevant local connection

Applicants who wish to be considered for Extra Care Housing should submit a HOME Argyll application form indicating their interest therein. In addition, applicants will also be required to complete a Health and Housing Needs Assessment Form.

Applicants will be prioritised on the basis of housing need in accordance with the HOME Argyll allocations policy and in conjunction with Argyll and Bute Social Work, in terms of care and support needs on the basis of the Indicator of Relative Need (IORN), determined through a Single Shared Assessment. Providing the eligibility criteria is met, these will form the base for the selection of applicants.

6.6 Move on Accommodation

Within Argyll there are projects that provide “move on” accommodation for identified client groups, such as the Rooftops Project run by Quarriers in Oban. This provides accommodation to young people up to the age of 25. In order to ensure that tenants are moving regularly (subject to the necessary support requirements) and to conform with the ethos of these projects, such applicants will be awarded Category 2 points (equivalent to Notice to Quit points) from the date of their application.

July 2009 consultation draft

7.0 Customer Service

7.1 Information and Advice

We aim to ensure that all applicants and existing tenants receive high quality information and advice which enables them to make informed choices about their housing. This approach is in line with Argyll and Bute Council's Housing Information and Advice Strategy and partners staff will all be trained to comply with relevant National Standards. We will give advice to applicants on issues such as:

- how to apply for housing and how the application will be dealt with
- timescales for processing and assessing applications
- the role of applicant and what information they are expected to provide
- applicants' realistic chances of obtaining a tenancy from their chosen RSL(s)
- each partner's housing stock
- Other housing options

All potential applicants will be informed of their right to be admitted to the housing list of all partner RSLs, and have their housing needs fully assessed as a result of this application. No applicant will be discouraged from making an application to any RSL.

All information and advice will be provided in an accessible format which meets the needs of individuals. All written information will be simple, easily understood and in plain English. Information and advice will also be available on request in a range of other languages and formats to meet the needs of individuals.

7.2 Training

HOME Argyll recognises and values the contribution of staff involved in the Common Housing Register. We are committed to providing appropriate levels of ongoing support and training to all those staff concerned with providing advice, information and assistance to both applicants and existing tenants. This will allow individuals to give an efficient, effective service that meets regulatory requirements and provide staff with the opportunity for personal development. To facilitate this we will:

- Formulate a joint annual training and development plan for staff involved in HOME Argyll
- Ensure that there are enough resources set aside to deliver the above plan
- Ensure staff are working towards nationally recognised standards for housing information and advice
- Hold an annual staff review day to look at how the policy is operating
- Carry out evaluation of any training undertaken

7.3 Performance Monitoring

We aim to ensure that the allocations policy meets the needs of those seeking housing, and that all applicants are satisfied with the quality of service they receive throughout the application and allocation process.

July 2009 consultation draft

In order to ensure this, HOME Argyll will formulate joint monitoring and evaluation systems which assess performance and satisfaction with the service provided. Furthermore regular reports on performance are provided to each partner RSL's Committee. These reports include information on: numbers of applicants, timescales for assessing applications, timescales for rehousing etc'

7.4 Promoting HOME Argyll

We will ensure that this allocation policy is promoted effectively to the communities in which we operate through a number of mechanisms. A summary of the policy will be made available to all applicants at the point of application, and applicants will be informed of how to access a full copy. Both the summary and full copy will be made available online as part of the new 'Housing Information and Advice' website (www.homeargyll.co.uk) created to provide comprehensive advice on housing options in Argyll and Bute.

We will work with other agencies operating in Argyll and Bute – particularly housing information and advice providers – to raise awareness of HOME Argyll as a whole. Promotion of HOME Argyll and this allocation policy will be primarily undertaken through the Housing Information and Advice Group which was established as part of the Argyll Advice Network to take forward the Housing Information and Advice Strategy.

We will make this policy available in other formats on request, and advise applicants of this service. We will ensure that promotion of HOME Argyll and the allocation policy involves awareness raising with vulnerable and minority groups, such as minority ethnic communities, people with disabilities, young people and older people.

7.5 Appeals and Complaints

While we aim to provide the best possible service to our tenants and all other individuals or organisations that come into contact with the partner associations, we recognise that there will be occasions when we fall short of the standards we have set ourselves, and that improvements come from recognising and addressing these.

As such, we have developed a joint complaints and appeals procedure which means that you can complain about any element of our service during the application or allocation process to any of the partner landlords. For example, applicants may wish to appeal about the way in which priority for housing was assessed or their suspension or removal from the housing list.

A full copy of the joint complaints procedure is available on request from all of the partner associations.

Applicants will be reminded of the opportunity to complain or appeal at key stages in the application and assessment process. We aim to ensure that complaints and appeals are minimised through the provision of high quality information and advice throughout the application and assessment process.

July 2009 consultation draft

Appendix 1: Points Categories

Category 1	Points
Eligible priority homeless	200*
Experiencing domestic abuse/ severe harassment	200
Management needs (RSL demolition area)	200
Health & Housing Need – Danger to occupy home	200
Leaving Care/Throughcare	200
Category 2	Points
Health & Housing Need – urgent	50
Lacking amenities/ poor property condition - severe	50
Issued Notice to Quit	50
Move on Accommodation	50
Category 3	Points
Overcrowding	30 if lacking one room (20 points for each additional bedroom required)
Health & Housing Need - Serious	30
Category 4	Points
Tenant without lease (not paying rent)	25
Living in temporary accommodation/ hotel/ B&B	25
Significant harassment	25
Incoming worker	25
Category 5	Points
Sharing facilities (with children/ access to children)	20
Category 6	Points
Lacking amenities/ poor property condition – significant	15
Short assured tenancy	15
Category 7	Points
Health & Housing Need - Significant	10
Sharing facilities – adults no children	10
Assured tenancy	10
Non priority homeless	10
Intentionally homeless	10
Underoccupation	10

- ***Applicants receiving priority as statutorily homeless will be allocated 200 points only. Homeless applicants will be entered onto a separate list, and 50 per cent of all allocations made will go to this group.***
- ***Any other applicant attracting points from Category 1 will not be entitled to points from the other categories as 200 is the maximum award.***

July 2009 consultation draft

Appendix 2: Common Assessment of Need

CATEGORY 1– 200 Points

Housing Need	Assessment Criteria	Verification Criteria
Eligible homeless	<ul style="list-style-type: none"> ○ Assessment by ABC Homelessness Service 	<ul style="list-style-type: none"> ○ Determination letter provided by ABC Homelessness Service (not from applicant)
Experiencing domestic abuse or severe harassment	<ul style="list-style-type: none"> ○ Agreed common definition of violence/ harassment – general guidelines preventing from living in home 	<ul style="list-style-type: none"> ○ As appropriate and sensitive to case – make use of Homelessness procedures ○ Refer to homelessness as appropriate following initial RSL assessment of need
Management needs	<ul style="list-style-type: none"> ○ Property in RSL demolition area ○ Property no longer available for occupation 	<ul style="list-style-type: none"> ○ Confirmation from RSL ○ Points only awarded to relevant RSL
Health & housing need – danger to occupy home	<ul style="list-style-type: none"> ○ Unable to return home and/or environment, or ○ Unable to continue living in own home ○ Not practical to adapt current home 	<ul style="list-style-type: none"> ○ Health and housing need assessment ○ Award checked by partner RSL
Leaving Care/Throughcare	<ul style="list-style-type: none"> ○ Applicant has valid Pathway Plan 	<ul style="list-style-type: none"> ○ ABC will assist with Pathway plan, once in place applicant added to list at aged 16 with 200 points

July 2009 consultation draft

CATEGORY 2 – 50 Points

Housing Need	Assessment Criteria	Verification Criteria
Lacking amenities/ poor property condition – severe	<ul style="list-style-type: none"> ○ No fixed bath, shower or wash hand basin ○ No inside WC ○ No piped water ○ No mains electricity ○ Structural instability ○ Dampness or water penetration - severe 	<ul style="list-style-type: none"> ○ Self assessment – verification at allocation
Issued a valid Notice to Quit (including leaving tied accomm/ HM Forces/ asked to leave family home/ leaving prison/ leaving care/ closing order...)	<ul style="list-style-type: none"> ○ Valid NtQ 	<ul style="list-style-type: none"> ○ Assess validity of NtQ according to tenancy type ○ Provide advice/ refer to advice agencies if NtQ not valid
Move on Accommodation	<ul style="list-style-type: none"> ○ Applicant will be living in an identified project 	<ul style="list-style-type: none"> ○ Clarification from project of applicants circs.
Household in urgent need of rehousing due to health & housing need	<ul style="list-style-type: none"> ○ Unable to access to essential facilities unaided and/or, ○ Would be housebound without support, or ○ Condition restricts ability to live in home and/or environment ○ Not practical to adapt current home 	<ul style="list-style-type: none"> ○ Health and housing need assessment

CATEGORY 3 – 30 Points

Housing Need	Assessment Criteria	Verification Criteria
Overcrowding	<ul style="list-style-type: none"> ○ Common definition of overcrowding 	<ul style="list-style-type: none"> ○ Self assessment – verification at home visit
Household in serious need of rehousing due to health & housing need	<ul style="list-style-type: none"> ○ Becoming less able to access essential facilities unaided and/or ○ Less able to get out of house unaided, or ○ Becoming less able to cope in current house/environment ○ Not practical to adapt current house 	<ul style="list-style-type: none"> ○ Health and housing need assessment

July 2009 consultation draft

CATEGORY 4 – 25 Points

Housing Need	Assessment Criteria	Verification Criteria
Tenant without lease	<ul style="list-style-type: none"> ○ Adopt position of belief 	<ul style="list-style-type: none"> ○ Discuss with applicant ○ Tenancy reference if available ○ Links to Homelessness Service as appropriate
Living in temporary accommodation (hostel, B&B, hotel, etc)	<ul style="list-style-type: none"> ○ Adopt position of belief 	<ul style="list-style-type: none"> ○ Discuss with applicant ○ Tenancy reference if available ○ Links to Homelessness Service as appropriate
Experiencing significant harassment	<ul style="list-style-type: none"> ○ Agreed common definition of significant harassment – general guidelines nuisance behaviour 	<ul style="list-style-type: none"> ○ As appropriate to case ○ Generally police report/ neighbour evidence/ Social Work report
Incoming worker	<ul style="list-style-type: none"> ○ Assessed on individual circumstances based on need to move to area ○ Guidance issued to staff on assessing status 	<ul style="list-style-type: none"> ○ Confirmation from employer

CATEGORY 5 – 20 Points

Housing Need	Assessment Criteria	Verification Criteria
Sharing facilities (family with children)	<ul style="list-style-type: none"> ○ With dependent children/ access to children and sharing kitchen, bathroom and/ or living room with anyone other than household 	<ul style="list-style-type: none"> ○ Self assessment – verification at allocation

CATEGORY 6 – 15 Points

Housing Need	Assessment Criteria	Verification Criteria
Lacking amenities/ poor property condition – significant	<ul style="list-style-type: none"> ○ No hot water ○ No proper cooking facilities ○ No central heating ○ Poor ventilation ○ Dampness or water penetration - moderate 	<ul style="list-style-type: none"> ○ Self assessment – verification at allocation
Short assured tenancy	<ul style="list-style-type: none"> ○ Has short assured tenancy agreement 	<ul style="list-style-type: none"> ○ Sight of tenancy agreement

July 2009 consultation draft

CATEGORY 7 – 10 Points

Housing Need	Assessment Criteria	Verification Criteria
Household in significant need of rehousing due to health & housing need	<ul style="list-style-type: none"> ○ Living at home and facilities do not meet current health needs 	<ul style="list-style-type: none"> ○ Health and housing need assessment
Sharing facilities (adults with no children)	<ul style="list-style-type: none"> ○ Adult(s) sharing kitchen, bathroom and/or living room with anyone other than household 	<ul style="list-style-type: none"> ○ Self assessment – verification at allocation
Assured tenancy	<ul style="list-style-type: none"> ○ Has assured tenancy agreement 	<ul style="list-style-type: none"> ○ Sight of tenancy agreement
Non priority homeless	<ul style="list-style-type: none"> ○ Assessment by ABC Homelessness Service 	<ul style="list-style-type: none"> ○ Determination letter provided by ABC Homelessness Service (not from applicant)
Intentionally homeless	<ul style="list-style-type: none"> ○ Assessment by ABC Homelessness Service 	<ul style="list-style-type: none"> ○ Determination letter provided by ABC Homelessness Service (not from applicant)
Underoccupancy	<ul style="list-style-type: none"> ○ Common definition of underoccupancy 	<ul style="list-style-type: none"> ○ Self assessment – verification at home visit