

Housing Allocation Policy

HOUSING ALLOCATION POLICY	
Purpose	The Housing Allocations Policy sets out Harrison Housing's general approach to the allocation of housing for new applicants.
Applies to	New applicants for housing at Harrison Housing owned schemes, and taken into consideration at the managed schemes.
Date first implemented	December 2024
Author	Housing Manager
Date first approved by Leadership Team	December 2024
Date first approved by Board of Trustees	December 2024
Review Frequency	Every 3 years or in event of legislative change
Service Area	Housing Management
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CONSEQUENTIAL AMENDMENTS (made prior to full policy revision)		
Amendment Date	Nature of Amendment	Revised by

VERSION HISTORY			
Revision Date	Version No.	Revised by	Approved by

CURRENT POLICY REVISION	
Date revised	August 2024
Revised by	Housing Manager
LT approval date	September 2024
Board of Trustees Approval date	December 2024
Next revision due	December 2027

1. Policy Statement

- 1.1. Harrison Housing is an almshouse charity, providing accommodation for older people of limited financial means, who are in housing need and unable to secure accommodation from other sources.
- 1.2. This policy applies to new applicants seeking accommodation with Harrison Housing. Existing residents wishing to transfer to alternative accommodation will be considered in accordance with the Transfer Policy.
- 1.3. Harrison Housing strives to operate a fair and transparent housing allocation policy for all applicants. This policy will operate with full regard to the Equality Act 2010.
- 1.4. We take direct referrals as well as referrals from other almshouses, local authorities and other housing support agencies.
- 1.5. Harrison Housing works with local authorities and other housing support agencies to assist them in meeting local housing need. Applicants are also encouraged to register with the local authority in order that they can maximise their chances of being rehoused.

2. Policy Principles

- 2.1 Whilst Harrison Housing does not have a statutory duty under the Housing Act 1996 (parts 6 and 7) it does aim to work in co-operation with the local housing authorities where its Almshouses are situated.
- 2.2 Harrison Housing will, where possible, co-operate with the relevant local authorities in fulfilling their duties to meet identified local housing need. This includes assistance with local authorities' homelessness duties, and through meeting obligations under any current or future nominations agreements.
- 2.3 As a Registered Provider of Social Housing, Harrison Housing will seek to allocate homes designed or adapted to meet a specific need in a way which is compatible with the purpose of that housing.
- 2.4 We will be fair and reasonable in the way which we allocate our housing stock, and we will have a simple and accessible appeals process for allocation decisions.

3. Implementation

- 3.1 All staff will be made aware of this policy through Harrison Housing's internal communication channels, including email.
- 3.2 Changes to this policy and its associated procedure, if applicable, will be communicated to all staff.
- 3.3 All housing management staff will be required to read this policy, and to confirm that they have read and understood it.
- 3.4 This policy will be published to residents and applicants through our website, and to potential applicants via our referral agencies.

4. Legislative Framework

- 4.1 The following legislation and regulation is relevant to this policy (not exhaustive):
 - Equality Act 2010.
 - Landlord's Guide to right to rent checks (Home Office 8 February 2024).
 - Tenancy Standard Consumer Standards (April 2024) Allocations and Lettings.
 - The Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006.
 - The Allocation of Housing and Homelessness (Eligibility) (England) and Persons subject to Immigration Control (Housing Authority Accommodation and Homelessness) (Amendment) Regulations 2021.

5. Responsibility

- 5.1 The responsibility for processing applications, interviewing applicants and allocating properties is primarily a Housing Management function. This process is conducted by the Housing Manager, with support from scheme managers.
- 5.2 The Chief Executive and one other member of the Leadership Team will consider any request for a review of allocations decisions (stage 1 appeal). That review may be requested by the applicant, their advocate or a scheme manager. A panel of two Trustees will be responsible for hearing second stage appeals on allocations decisions.
- 5.3 A summary report of allocations decisions will be made to each Trustee meeting as a part of the Housing Management Report, and will be done on an anonymized basis by the Housing Manager.

- 5.4 There will be an annual review of the effectiveness of the allocations policy.

6. Eligibility Criteria

- 6.1 A table of specific Eligibility Criteria for each almshouse that we manage is set out at Appendix 1. This will take into account the legacy criteria for almshouses previously taken into direct ownership by Harrison Housing, and the current criteria set by the almshouses which we manage on behalf of other almshouse charities.
- 6.2 Any changes to legislation which could lead to criteria being considered discriminatory, unfair or unworkable, will be taken up directly with the Trustees of the relevant charity.
- 6.3 Age criteria apply to most properties owned by Harrison Housing, and these are stated on the application form and table of eligibility criteria.
- 6.4 Currently two schemes owned and managed by Harrison Housing are single-sex schemes. For the avoidance of doubt single sex schemes are open to applicants who have the protected characteristic of gender reassignment and who now identify as having the same sex as that required in the criteria. There is no legal requirement to hold a Gender Recognition Certificate to be protected under the Equality Act 2010. Personal data connected with Gender Reassignment should be treated as special category data and treated in the utmost confidence.
- 6.5 Other than the above age and sex criteria, all allocation decisions will be made with full regard for the protected characteristics set out in the Equality Act 2010.
- 6.6 In line with the Harrison Housing Articles in order to be considered applicants must be of limited financial means, in housing need and unable to meet this need due to low income or savings.
- 6.7 Applicants who have sufficient financial resources to resolve their own housing need cannot be considered for Harrison Housing accommodation. The annual household income of applicants, their savings, and any financial interest they may have in other property will be considered when assessing their financial resources.
- 6.8 The Eligibility Criteria at Appendix 1 will be reviewed annually by the Housing Manager to update these financial criteria. Objective criteria such as the “benefit cap” for working age applicants, Local Housing Allowance rates, Pension Credit Guarantee and the London Living Wage will be used to update these criteria. The Housing Manager will report the outcome of this annual review to Trustees as part of the Housing Management Report in Quarter 1.

- 6.9 Applicants are required to be capable of living independently, or with minimal support. They should be capable to self-evacuating the building in the event of a fire alarm, as many of our buildings have a self-evacuation policy rather than “stay put”.
- 6.10 Allocation decisions for applicants to specific schemes will need to consider the layout of the building, the mobility of the applicant, and any reasonable adjustments which can be made to the accommodation and access routes. Harrison Housing owns and manages buildings which predate legislation on accessibility and it is not always possible to make adjustments due to the building types. Where possible we will seek to accommodate mobility needs and other disabilities, but this will be within the limitations presented by these older buildings with limited external access routes.
- 6.11 Applicants will be invited to demonstrate a reason for wishing to live in a particular location, such as needing to live near relatives who can offer support, or where they have lived in the area previously. Proximity to GP facilities or the applicant’s religious community, and involvement in the local community, will also be considered.
- 6.12 Local eligibility criteria may also apply to certain almshouse accommodation where the trust deed or governing document specifies the client group that may be housed in that accommodation. Details of eligibility criteria along with the application form are available at Appendix 1.
- 6.13 Applications for properties classed as sheltered housing will be accepted from those who are in need of the support offered by the sheltered housing service, namely the Scheme Manager and community alarm system.
- 6.14 Applicants who are not UK citizens but who have settled status, indefinite leave to remain or exceptional permission to stay in the UK granted by the Home Office will be considered on an equal basis with other applicants.
- 6.15 Harrison Housing may in exceptional circumstances exercise discretion in housing applicants who do not meet all the eligibility criteria. This will be presented to the Trustee(s), who have been designated as responsible for allocations, based on an anonymised report.

7. Application and Waiting List Procedure

- 7.1 Harrison Housing will seek to maintain a combined waiting list for all the schemes which it owns and manages. This list will be capable of filtering by scheme preference to identify applicants interested in a particular almshouse where a vacancy has arisen.
- 7.2 We will seek direct applications from individuals seeking housing, and will also invite local authorities, primary care providers and voluntary organisations to make referrals.

- 7.3 A standard application form is available on our website, and can be sent electronically or in hard copy when requested from us by email, via webform, in person or by telephone.
- 7.4 Completed application forms should be posted to our main office address, handed to a scheme manager, or emailed to info@harrisonhousing.org.uk.
- 7.5 The Housing Manager will review all application forms received and if these meet the eligibility criteria of schemes selected on the form, the summary details will be logged on the Waiting List by the Housing Manager. The Housing Manager will write to the applicant, with 10 working days, to let them know that their application has been accepted in principle, and that they will be contacted when a suitable vacancy arises. If relevant, the applicant will be advised if they are eligible for some schemes selected but not others, with a reason given. The acknowledgement letter will include information about local support services to approach if the housing need escalates in the meantime.
- 7.6 If an application is received which is ineligible for all schemes we will set out in writing why we believe they are not eligible and providing details of other useful support services.
- 7.7 Applicants accepted onto the housing list will be contacted annually and asked to provide updated information relating to their current circumstances and housing requirements.
- 7.8 Applicants who do not respond to the housing list review letter within the stated timescale will be removed from the list.
- 7.9 We will usually make a maximum of two reasonable offers of accommodation. After one offer is refused, we will inform the applicant that they will only be made one more offer. If this provision is exhausted the applicant will be informed that they are being removed from our waiting list. Our appeals procedure can be used to challenge this decision if the applicant believes the offer or offers of accommodation were unreasonable and they will need to provide evidence to support this appeal.

8. Interview and Selection Procedure

- 8.1 When a vacancy arises at a scheme, the Housing Manager will review all available applications, and filter the waiting list to select those who have selected the relevant scheme. The waiting list is maintained in date order of receipt of the application, and will contain information about the age, last known address, scheme preference and current housing situation of the applicant. The potential applicants for the vacancy will be prioritised for contact as follows:

Housing need:

- Immediate Housing need (currently roofless, fleeing harassment or domestic abuse, squatting or using night shelters).
- Insecurely accommodated (e.g. staying with friends or family on a temporary basis, living in insanitary or overcrowded conditions, sofa surfing).
- At risk of becoming homeless in near future (e.g. eviction date, possession date, Notices served, accommodation being sold).

Local connections and needs:

- Currently lives in the borough or previous long-term connection to the area.
- Medical and other support services in the area.
- Working or volunteering in the borough.
- Access to sources of support for cultural or religious needs.
- Close family or friends in the area.

Ability to live independently and sustainably in the accommodation:

- See above concerning accessibility needs and scope to make reasonable adjustments to older buildings not constructed to 21st Century standards.
- Ability self-evacuate from accommodation offered, in the event of a fire alarm.
- Ability to afford the accommodation offered (within the financial criteria limits set for this almshouse accommodation) and to manage the other regular outgoings.

- 8.2 The Housing Manager will provide the Scheme Manager with a list of at least three applicants, in priority order, to be invited for interview at the scheme. The applicant will be invited to make an appointment with the scheme manager within one week of being contacted (this may be extended in exceptional circumstances).
- 8.3 At interview the Scheme Manager will show the applicant the property, subject to any safety needs if work is being carried out, and will also show the applicant the communal facilities. This visit to the scheme will give the applicant opportunity to consider the location of the scheme and the nature of the accommodation being provided.
- 8.4 The applicant will be asked to bring with them, proof of identity (preferably photo ID), proof of current address, proof of income/benefits/savings, and proof of right to rent/remain in the UK. Copies will be taken by the Scheme Manager.

- 8.5 The Scheme Manager will use the completed application form as a framework for the interview, to ensure any missing information or existing information is up to date. In particular the Scheme Manager will ask for up to date information about income, savings and any other properties the applicant has an interest in. The applicant should be asked to explain how their current housing situation has arisen and their reason for wanting to live at this particular scheme.
- 8.6 The Scheme Manager will provide a report to the Housing Manager, with a recommendation as to the suitability of the applicant, accompanied by the copies of proofs described above. If any information appears to be missing or incomplete the Housing Manager will ask the Scheme Manager to follow this up. The Housing Manager will make a decision about the appropriateness of the accommodation for the applicant usually within 5 working days of having received a complete report.
- 8.7 If the applicant is successful, they will be contacted by the Scheme Manager to arrange a date to sign their licence agreement, subject to all repairs having been completed at the property. Any individual conditions set will be explained at this point.
- 8.8 If the applicant is unsuccessful the Housing Manager will write to them with an explanation, setting out rights to appeal. They will be advised if they are still eligible to remain on our waiting list.
- 8.9 If the original shortlist is then exhausted, the Housing Manager will go back to the waiting list to identify the 3 next most suitable applicants and the process will continue until a suitable applicant is offered and accepts the accommodation.
- 8.10 When a suitable applicant has accepted in principle, an offer letter will be sent, detailing the proposed charges, and start date for the licence agreement. This will include an appointment date and time to attend to sign the licence agreement and details of any additional documentation which may need to be seen.
- 8.11 The Housing Manager will collate all safety related certificates needed in time for the start of the Licence Agreement including where applicable (but not limited to) Landlord Gas Safety Certificate, Water Cylinder Inspection Certificate, Electrical Installation Certificate and Energy Performance Certificate.
- 8.12 The Housing Manager will prepare the sign-up paperwork, including licence agreement, resident details form and standing order form. The Housing Manager will check with the Finance Team what part month payment is due in advance before a standing order can be set up. It is our usual expectation that a new resident will pay one month's charges in advance to ensure that

the account remains in credit pending any benefits application or the setting up of a regular monthly standing order.

- 8.13 The sign up will usually be conducted by the Scheme Manager, and the Housing Manager will counter sign the Licence Agreement. The Scheme Manager will send copies of the completed documents to the Housing Manager for these to be uploaded as part of the process of setting up the new resident on our Housing Management system (SDM). The Housing Manager will set this up on SDM within one week of sign up and notify the Finance Team.

9. Appeals Process

- 9.1 **Stage 1** - Where an applicant is not accepted for the waiting list, or is unsuccessful in interview for a vacant property, they may in the first instance appeal in writing to the Chief Executive of Harrison Housing, setting out their reasons for appeal. The Chief Executive, along with a member of the Leadership Team, but not the Housing Manager, will consider the available evidence. If it is considered that it is a particularly complex case further clarification may be sought from the Housing Manager and/or the Applicant. A written response will be sent to the applicant, usually within 10 working days of receipt of the appeal. This will include detail of how to take the appeal to stage 2.
- 9.2 **Stage 2** – if the applicant remains dissatisfied with the outcome they may appeal to the Trustees of Harrison Housing. The Chair of the Board will nominate two Trustees to review the decision not to offer accommodation. A written response will usually be sent to the applicant within 20 working days of receipt of the stage 2 appeal.
- 9.3 The potential outcome at either stage may include one or more of the following outcomes (list not-exhaustive):
- The decision is upheld in full.
 - The decision is partially upheld, e.g. correct decision but could have been better explained or not made in timely fashion.
 - The decision is not upheld, and the applicant is assured that the next available property at the same scheme will be offered if their circumstances are unchanged.¹
 - The applicant is advised that they are not eligible to be housed at one or more of Harrison Housing's owned or managed schemes.
 - The applicant is advised of suitable alternative housing options.

¹ Due to the timescales involved in the appeals process we may not be able to allocate the property originally offered.

- 9.4 Should the applicant complete both stages and still be dissatisfied, they have the right to contact the Housing Ombudsman. The Ombudsman would normally expect the applicant to have exhausted the Appeals Procedure before they start to investigate the case. Any stage 2 response which does not uphold the appeal will include the following contact details:

Housing Ombudsman Service
Exchange Tower
Harbour Exchange Square
London
E14 9GE
Tel: 0300 111 3000
E-mail: info@housing-ombudsman.org.uk

10. Monitoring and Review

- 10.1 The Housing Manager will include in their Housing Management Report to Trustee meetings, details of any new lettings each quarter, including details of how many applicants were interviewed before the vacancy could be filled. This report will include details of any difficulties experienced in letting the vacant properties.
- 10.2 The Housing Manager will report annually to the Trustee meetings (for both Harrison Housing and managed schemes). This will comprise of an anonymised report of:
- New applications received,
 - Applications accepted to the shortlist,
 - Applicants interviewed,
 - Applicants accepted.
- 10.3 Where possible, with sufficient numbers to avoid identifying individual applicants this information will also break down the equalities information available.
- 10.4 The Trustees will monitor the effectiveness of this policy in light of the above information, on an annual basis and provide feedback to the Leadership Team.
- 10.5 The policy will be comprehensively reviewed on a 3 yearly basis by the Housing Manager and any updated version submitted to the Trustees for approval.

11. Equality, Diversity, and Inclusion

- 11.1 For Harrison Housing, diversity is about respecting people's individual differences and ensuring that all people that come into contact with us have access to the same high standards of behaviour and service.
- 11.2 We are committed to ensuring that no resident or team member will be treated less favourably because of their protected characteristics.
- 11.3 Where necessary reasonable adjustments will be made to our allocation procedures to ensure fair access. This includes, but is not limited to:
- Use of Braille or BSL interpreter
 - Use of a language interpreter
 - Use of adaptive software to communicate
 - Facilitating attendance at the interview by a family member or advocate to support the applicant.
 - Flexibility in arranging an interview in the early morning or early evening to accommodate working commitments for the applicant.