



ALLOCATIONS POLICY

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Where this policy affects	General needs		X	Supported		X	Office / staff base	

1. Introduction

1.1 The aim of this policy is:

- to provide a fair and accessible system of allocating good quality rented housing for people in housing need
- to contribute to providing balanced and sustainable balanced communities, defined as:

“A mix of individuals and family groups of all ages with a range of different life experiences including employment, unemployment, good health or disability, who will together form a wide and balanced community living in properties of different types and tenure, and representative of society in general.”

1.2 This policy sets out the standards and general guidance Almond Housing Association Limited (AHA Ltd.) will follow to ensure that:

- our properties are allocated in a fair and reasonable way to those most in need;
- at the same time we make the best use of our housing stock.

1.3 This policy complies with current legislation and is supported by a range of detailed procedures covering the initial assessment and lettings process and subsequent activities such as assignation, succession, exchanges and transfers etc.

2. Common Housing Register (CHR)

2.1 In partnership with Link Group Association and West Lothian Council, AHA Ltd. operates a common register of applicants, the West Lothian Housing Register (WLHR). This simplifies the application process for those seeking social housing in West Lothian.

2.2 In the event AHA Ltd develops or adds housing stock outwith West Lothian we will investigate joining that local authority Common Housing Register if one is in place.

2.3 With our partners, AHA Ltd. will seek to make the CHR application form as clear, ‘jargon free’ and straightforward to complete as possible. The form will ask only for the information that we require in order to assess the need for housing.

3. Information and Advice

3.1 AHA Ltd. will seek to ensure that all the information, advice and communications about our application and lettings arrangements, whether given verbally or in writing, is in plain, easily understood language.

3.2 A copy of the full policy will be made available to anyone who asks for it.

3.3 AHA Ltd. will provide information on alternative sources of housing or housing advice, following the ‘Housing Options’ guidance from West Lothian Council.

- 3.4 AHA Ltd. will provide clear advice on:
- how to complete the application form;
 - any additional information applicants are expected to provide;
 - what will happen following receipt of the application;
 - how and when we will respond to an application.

4. Joining the Common Housing Register

- 4.1 AHA Ltd. will operate an open housing register, will accept applications at any time and will actively promote access to application forms:
- By directing customers via our website how to make an online application
 - By advising customers who cannot get online how they can seek assistance to do so
- 4.2 Applicants must let us know of any changes to their circumstances that may affect the assessment of their application and their priority. Failure to do so could affect their opportunity to be housed by AHA Ltd. Changes of circumstances may be advised at the offices of any of the partners to the West Lothian Housing Register.
- 4.3 Applicants must be aged 16 or over.

5. Supported Housing and Community Care

- 5.1 AHA Ltd. will assist West Lothian Council to achieve their Care in the Community objectives by entering into arrangements or agreements with voluntary or statutory organisations, through which we will provide housing and the organisations will provide a variety of support arrangements to meet the particular needs of tenants, including support for young people who may be taking up a tenancy for the first time.

Although AHA Ltd. is a general needs provider we will where possible provide specially designed housing for applicants with particular needs.

6. Transfers and exchanges

- 6.1 AHA Ltd. will accept applications from our own tenants who wish to transfer to another of our properties, and from tenants who wish to exchange their home either with another of our tenants or a tenant of another landlord.

7. Board of Management & employees

- 7.1 Current or former members of AHA Ltd.'s Board of Management and current or former employees, or their close relatives, may apply for housing. Apart from the requirement to

include information on their link to Almond on the form, the application will be assessed in exactly the same way as all other applications.

AHA Ltd. will comply with the requirements to record any resulting allocation of housing to someone in these categories according to current legislation and guidance from the Scottish Housing Regulator. For further details see the Payments, Entitlements & Benefits policy.

8. Reviewing the register

- 8.1 The WLHR Central Administration Team (CAT) will periodically send each applicant a questionnaire asking if their circumstances are the same as stated on their application, and if they wish to remain on the register. This is generally done each year.
- 8.2 If the applicant does not return the questionnaire within the specified time-scale the CAT will advise them in writing that they have been excluded from the register.
- 8.3 If an excluded applicant applies for re-instatement within 3 months of the notification, they will normally be added back onto the register without any further action. If an applicant applies for re-instatement after 3 months the CAT will re-assess their housing needs and only re-instate them if the reason for non-response was clearly outwith their control.

9. Exclusion and suspension

- 9.1 In accordance with the Housing (Scotland) Act 2001 AHA Ltd. will only exclude or remove applicants from the housing register in the following circumstances:
 - a) where the applicant has requested in writing that they be removed;
 - b) following the death of the applicant;
 - c) where the applicant fails to respond to a review of the register (see above).
- 9.2 As required, AHA Ltd. will suspend an applicant from receiving offers of housing, in accordance with the Suspending Applicants on the Housing Register policy.

10. Assessing Applications

- 10.1 The CAT will assess every application from the information provided using a 'group plus points system' (see Appendix 2). The points system will be publicised in the information available to all applicants and details are also available in the AHA Ltd. office.
- 10.2 The number and type of groups, and the points system, will be reviewed annually by the Director of Housing Management, and any amendments will be submitted to the Board of Management for approval.

- 10.3 Each applicant will be allocated to the group that represents their greatest housing need. Their placing in that group will depend on the total points they are entitled to.
- 10.4 The groups and points systems have been designed to comply with the current Housing the Housing (Scotland) Act 2014 (with effect to ensure that we give ‘reasonable preference’ to the specified categories of applicants, as follows:

2014 Act: ‘Reasonable preference’ to be given to applicants who are:

- homeless or threatened with homelessness, and who have unmet housing needs, or
- living in unsatisfactory housing conditions and who have unmet housing needs, or
- existing tenants, who are considered to be under-occupying their property.

11. Allocation of Housing

- 11.1 A vacant property will normally be offered to the applicant who has the highest priority in a particular group.

To determine the group from which the next allocation should be made AHA Ltd. will refer to the current quotas allocated to each group (see Appendix 2). The quotas will be reviewed annually by the Director of Housing Management, and any amendments will be submitted to the Board for approval.

- 11.2 New build properties will no longer only be offered to existing AHA Ltd. tenants who are on our transfer list for the type/size of property available. The Director of Housing Management, in consultation with the Allocations Sub Committee can determine grouping based upon the circumstances of that development.

- 11.3 AHA Ltd. will take into account the need to maintain a balanced community defined as:

A mix of individuals and family groups of all ages with a range of different life experiences including employment, unemployment, good health or disability, who will together form a wide and balanced community living in properties of different types and tenure, and representative of society in general

- 11.4 AHA Ltd. will consider special lettings initiatives, or local lettings plans, where this will help to:

- achieve a balanced community;
- achieve a sustainable community, i.e. “one where people want to continue to live in the same community, in sufficient numbers that the housing is effectively fully occupied”;
- achieve the occupancy of properties that have become difficult to let

- 11.5 A lettings initiative or lettings plan:

- will normally be for a specified period, **or**

- will be used in cases of particular low demand (difficult to let) properties, **and**
 - where specific funding is needed, will have to be approved by the Board of Management.
- 11.6 Where an individual property has been refused on several occasions, the Director of Housing Management will have delegated authority to initiate alternative letting arrangements with the approval of the Allocations Sub Committee.
- 11.7 We will consider cases with exceptional circumstances that fall outside the scope of the policy. These cases are required to be referred to the Director of Housing Management by the for consideration and then presented to the Allocation Sub Committee of the Board of Management for decision. The Board of Management will be made aware of any special case allocations.

12. Use of properties

- 12.1 To make the best use of AHA Ltd.'s stock, allocations will take account of the following:
- 12.2 Flats will be offered to those who wish this type of accommodation. Single persons will normally be offered flats unless there is a medical reason not to do so.

Where an applicant has one or more children under 12 years old, or they have informed us they are expecting a child, the applicant may be offered a flat. Normally this will be a flat with its own direct entrance and an exclusive garden area - i.e. either a 'main door' ground floor flat or an upper villa flat. However, to ensure that we are giving applicants the maximum choice to enable them to meet their housing needs, we may also offer a ground floor flat with indirect access to an exclusive garden, i.e. via the common passageway within the common entrance area.

[Note: Refusal of an offer of a ground floor flat with indirect access will not be counted as a refusal under our Suspensions of Applicants policy.]

Where all children are at least 12 years old a flat without direct access to a garden may be offered.

- 12.3 Houses will be offered to applicants according to their housing need and the availability of housing stock.
- 12.4 Bungalows. Due to the small number of this property type, in particular one-bedroom bungalows, they will normally be allocated only to applicants whose medical condition requires this type of accommodation. This means in practice that when they become available, they will be matched to the medical group ahead of other groups.
- 12.5 Specially adapted properties, e.g. wheelchair bungalows, will only be offered to applicants where either the applicant or a member of the household is a wheelchair user.

Applicants offered this type of accommodation will have to accept that should the tenant who needed the special adaptation user no longer reside at the property the remaining members of the household will have to vacate the property. However, they will be offered alternative accommodation to meet their needs according to this policy.

13. Occupancy levels

13.1 To maximise the occupancy level of AHA Ltd.'s properties, and due to the high number of 2- and 3-bedroom flats in our housing stock, space standards will be relaxed for 1 and 2 person households.

13.2 In much of Almonds stock areas there are only a small number of 2-bedroom houses and applicants can therefore be listed for both 2-bedroom and 3-bedroom houses. Where we only have 3-bedroom flats, none with direct access to a garden, single applicants will be considered for any vacancies that occur.

13.4 The type and sizes of properties that will be offered, subject to availability, are as follows:

1 and 2-person households	1 or 2-bedroom property
Households with 1 child	2-bedroom property
Households with 2 children	2 or 3-bedroom property*
Households with more than 3 children	3 or 4-bedroom property,

*subject to availability

13.5 In establishing housing need points, a family with 1 child will require 2 bedrooms, a family with 2 children will require 2 or 3 bedrooms, and a family with 3 children or more will be given points on the basis of requiring 3 or 4 bedrooms*.

[* In the case of applicants in receipt of housing benefit or Universal Credit, subject to the applicant's circumstances and views on whether they are willing to pay the additional rent for any bedroom they are deemed to be 'under-occupying']

14. Equality, Diversity & Inclusion

14.1 Almond aims to ensure that equality, fairness, dignity and respect are central to the way we work and how we treat our customers. We support diversity and uphold equal opportunities in all areas of our work as an employer and service provider.

14.2 Almond will not discriminate against tenants, staff, visitors, suppliers or others based on their age, sex, sexual orientation, race, disability, religion or belief, marital status, pregnancy and maternity or gender reassignment (collectively referred to as 'protected characteristics' in the Equality Act 2010).

15. Data Protection

15.1 Our policies and procedures foster an approach of 'data protection by design and by default'.

What this means in practice is that:

- Policies and procedures consider data protection issues, ie how to protect the data subject served by the policy or procedure;

- New systems, services, products and business practices involving personal data are designed and implemented to ensure personal data is protected by default;
- That the Data protection principles and safeguarding of individuals' rights (such as data minimisation, pseudo anonymisation, and purpose limitation) are clear in the policy or procedure;
- And that if the policy or procedure aims to provide service to vulnerable groups (e.g. children) that the personal data is treated with extra protection.

What this requires users of this policy to do is:

- Make sure that staff understand why data protection is important for the implementation of this policy, for instance via training or by reading the data protection policies;
- If we are undertaking a review of the policy, change to process or change to system, that we must consider doing a Data Protection Impact assessment, if the change is likely to result in a high risk to individuals.
- It is also good practice to do a DPIA for any other major project which requires the processing of personal data.

We will consult our data protection officer, if there is doubt over these requirements.

16. Policy Review

16.1 This policy will be reviewed every 5 years or as required due to legislative or regulatory change. The review will be completed by the Director of Housing Management and circulated to the Board of Management for approval.

17. Associated Policies & Guidance

17.1 This Policy takes account of the following documents:

- Rules of Almond Housing Association
- Equality & Diversity Policy
- Openness & Confidentiality Policy

It also considered documents whose principles are embedded into allocation policy and practice such as:

- the Scottish Social Housing Charter standards
- the Scottish Government guidance on allocations.

18. Responsibilities Chart

18.1 The chart below illustrates the responsibilities of all staff in relation to this policy.

	Board	CEO	Director of Housing Management	Housing Manager & Customer Care Manager	Front Line staff
Policy Review			✓		
Ensure policy reviewed and approved	✓	✓			
To oversee the policy, work with CHR partners, advising the Board, other Directors of Section and all employees as required on specific matters.			✓		
Appeals process			✓		
To manage the implementation of the policy and procedures on a day-to-day basis				✓	
To understand and implement policy					✓

Policy Assessment Checklist

Health & Safety Assessment

Does this policy have the potential to affect:

	Yes	No
Lone Working	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Safety and/or wellbeing of customers	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Safety and/or wellbeing of staff	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Equality Impact Assessment

Does this policy have the potential to affect:

	Yes	No
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Pregnancy and Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Religion or belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Sexual orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>

If you have answered 'Yes' to any of these points, please complete a full Equality Impact Assessment. If you have answered 'No', you need take no further action in completing an Equality Impact Assessment.

Data Protection Impact Assessment

Carrying out a Data Protection Impact Assessment [DPIA] will be useful to any project – large or small – that:

- Involves personal or sensitive data about individuals
- May affect our customers' reasonable expectations relating to privacy
- Involves information that may be used to identify or target individuals

A Data Protection Impact Assessment [DPIA] must be completed if the policy involves one or more of the following (please tick each that apply to this policy):

Evaluation or scoring	<input checked="" type="checkbox"/>
Automated decision-making with significant effects;	<input type="checkbox"/>
<i>Systematic monitoring</i>	<input type="checkbox"/>
<i>Processing of sensitive data or data of a highly personal nature</i>	<input checked="" type="checkbox"/>
<i>Processing on a large scale</i>	<input type="checkbox"/>
<i>Processing of data concerning vulnerable data subjects</i>	<input checked="" type="checkbox"/>
<i>Innovative technological or organisational solutions</i>	<input type="checkbox"/>
<i>Processing that involves preventing data subjects from exercising a right or using a service or contract</i>	<input type="checkbox"/>

<i>Use systematic and extensive profiling or automated decision-making to make significant decisions about people</i>	<input checked="" type="checkbox"/>
<i>Process special-category data or criminal-offence data on a large scale</i>	<input type="checkbox"/>
<i>Systematically monitor a publicly accessible place on a large scale</i>	<input type="checkbox"/>
<i>Use of new technologies involving significant innovation</i>	<input type="checkbox"/>
<i>Use profiling, automated decision-making or special category data to help Make decisions on someone's access to a service, opportunity or benefit</i>	<input checked="" type="checkbox"/>
<i>Carry out profiling on a large scale</i>	<input type="checkbox"/>
<i>Process biometric or genetic data</i>	<input type="checkbox"/>
<i>Combine, compare or match data from multiple sources</i>	<input type="checkbox"/>
<i>Process personal data without providing a privacy notice directly to the individual</i>	<input type="checkbox"/>
<i>Process personal data in a way that involves tracking individuals' online or offline location or behaviour</i>	<input type="checkbox"/>
<i>Process children's personal data for profiling or automated decision-making or for marketing purposes, or offer online services directly to them</i>	<input type="checkbox"/>
<i>Process personal data that could result in a risk of physical harm in the event of a security breach</i>	<input checked="" type="checkbox"/>
<i>There is a change to the nature, scope, context or purposes of our processing</i>	<input type="checkbox"/>

If a DPIA is not carried out, please summarise the reasons below

Appendix 1 GROUP QUOTA SYSTEM

To achieve and maintain a well-balanced community we will operate a group quota system and allocate properties to applicants from within each of the groups, according to their priority listing in that group. The percentage of quota assigned will take into account local agreements as required by the rapid re-housing transition plan (RRTP).

The groups and quotas are as follows:

Group	Quota (% of annual lets)
1. Statutorily homeless	35-45%
2. Insecure tenancy	10-20%
3. Existing tenants and general list	10-20%
4. Assisted referrals, specialist and medical	10-20%

Due to the uncertainty around which property types will become available, numbers of referrals, circumstances around medical points and other variables each group have a minimum and maximum percentage split.

An applicant will be placed in the most appropriate group using the circumstances most pressing. This means that if they could fall into several groups, they will be placed in the one with most chance of being rehoused. For example, if they have medical and homeless points, they will go into the homeless group.

Appendix 2 POINTS SYSTEM

The points system has been developed to ensure that properties are allocated in a fair and reasonable manner to those in housing need, while making best use of AHA Ltd.'s stock.

Placing an applicant in any of the first four groups will entitle them to a 'basic points' total. Additional points may then be awarded for any other housing need the applicant has at the time of applying.

The breakdown of points for each category is as follows:

Group 1 - Statutorily homeless 250 points

Applicants who have been classed as being 'statutorily homeless' by West Lothian Council or any other Local Authority (Section 5 referrals).

Group 2 - Insecure tenancy 250 points

- a) Applicants with no fixed abode or sleeping rough but who are not statutorily homeless in terms of the Housing (Scotland) Act 2001.
- b) Applicants who are threatened with homelessness, defined as:
 - Notice served on another tenancy or a lease not being renewed;
 - House sale pending (with date known);
 - Property being repossessed (with date known).
- c) Applicants living in temporary accommodation, e.g. accommodation for homeless persons, bed & breakfast, who are not statutorily homeless.
- d) Applicants living with relatives, friends or lodgings with no tenancy agreement.

Proof of the applicant's circumstances will be required, where relevant.

Applicants may also be awarded points under one or more of the remaining groups.

Group 3 - Existing tenants and general waiting list

Existing tenants: These are existing Almond tenants who have applied for an internal transfer. Their points total will depend on their individual circumstances and housing need. Any tenants with '0' points will be prioritised according to the length of their tenancy.

General waiting list : All applicants who are not in any other group will be placed in this group. Points will be awarded for:

<u>Overcrowding</u>	Lack of bed space - for every bed space lacking	50 points
	Applicants who occupy a bedsit or one bedroom flat but have a child who lives permanently with them.	150 points
	The living room will not be counted as a bedroom. Points will be given for household members who have to live apart due to overcrowding.	
<u>Self-contained Bed-sit</u>	Applicants living in a bed sit for more than one year	150 points
<u>Under occupation</u>	Points will be awarded to Almond tenants who apply for housing and under occupying the property, as follows:	
	Three or more bedrooms not used	200 points
	Two bedrooms not used	150 points
	One bedroom not used	150 points
	To meet size criteria	150 points
<u>Inappropriate Property</u>	We recognise that common entrance flats are not the best type of property for applicants with children and therefore the following points will be awarded:	
	Ground floor flats without direct, exclusive access to a private garden:	50 points
	First floor flats	100 points
	Other levels	150 points
	Senior Citizens over the age of 70 who reside in a block of flats will be awarded the following points:	
	First floor flat	75 points
	Second floor flat	100 points
<u>Disturbances</u>	Annoyance, intimidation, noise (Officer discretion)	50 points
<u>Family Support</u>	In cases where an applicant requires the support of, or gives support to, family members without which the individual would be unable to sustain their tenancy (normally, but not exclusively, a medical need, proof will be required) the following points will be awarded:	
	Applicants living outwith West Lothian District	100 points

	Applicants living within West Lothian District but not within a two mile radius of the person seeking support	50 points
<u>Lack of or Shared</u>	Where an applicant's present accommodation lacks amenities or they share facilities with anyone other than those included in their application form the following points will be awarded	
	Lack of/ shared inside toilet	50 points
	Lack of/shared bath or shower	50 points
	Lack of adequate hot water supply	50 points
	Lack of/shared kitchen/cooking facilities	50 points
	Lack of adequate heating system (heating in no more than one room)	50 points
<u>Household Condition/ Property Defects</u>	Should an applicant's present accommodation suffer from a severe level of dampness, condensation or water penetration, or it can be demonstrated that there is a risk to their household because of poor sanitation, structural problems or dangerous appliances (heating systems condemned or electric wiring faulty) the following points will be awarded:	
	Dampness/condensation or water penetration	50 points
	Sanitation/structural or dangerous appliance e.g. condemned heating system	50 points
	(Verification will be required in these instance	

4 - Assisted referrals, specialist and medical.

- a) Assisted referrals covers applicants supported by other agencies that meet our operational aims, e.g. Women's Aid, Rock Trust, Veterans Agencies, Open Door. **250 points**

- b) Medical covers applicants with a physical or mental illness or disability. Should an applicant have both a physical or mental condition, only one set of points will be awarded, e.g. if the physical need is 'urgent' and the mental need is 'high', the applicant will be awarded the 250 points for the 'urgent' need. If both needs are assessed at the same level, one set of points only will be awarded.

However if medical points are awarded for a mental health condition that is deemed to be covered by other categories in this policy, then only one set of points will be awarded, e.g. if the applicant is assessed to have an 'urgent' mental condition due to anxiety caused by overcrowding, then they will receive the 250 points for the 'urgent' condition and not the 150

points for overcrowding. If both sets of points are the same, only one set of points will be awarded.

Following assessment of the information provided, points will be allocated as follows:

Urgent	250 points
High	150 points
No priority	0 points

Applicants may also be awarded points listed under the general group.