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1. Our Mission and Values

Building better lives.

We exist to meet the greatest need in society through building better lives. We do this both as an actively developing and tenant-focused landlord and as a major provider of care, support and a range of local initiatives to address social injustice and inequality.

We empower people through tenant-led, co-operative and mutual housing – creating diverse neighbourhoods where each individual, family and community has the best opportunities to live independently. Through development we create quality new homes and sustainable communities where people can enjoy happiness, health and prosperity – the vital foundations for successful and fulfilling lives.

Where other services can no longer deliver, when opportunities dry up, when funding is unavailable, we remain the organisation that can and will help the people in the greatest need.

2. Overview

It is important that we publish clear and accessible policies, which outline our approach to allocations and lettings so that our customers and future customers know what to expect.

This policy explains how we allocate and let our Social and Affordable rented properties.

This policy has been prepared and will continue to be monitored in line with allocations and lettings policies published by relevant local authorities and with the Tenancy Standard as published by the Regulator of Social Housing (RSH)

3. Aims and Objectives

3.1 For our customers and future customers, we will:

- ◆ Let our homes in a fair, accessible, efficient and transparent way.
- ◆ Produce a customer summary of this policy
- ◆ Work with applicants to offer choice where possible and to minimise potential financial hardship. This will also apply to applicants who have limited housing options due to

relationship breakdown, domestic abuse, homelessness or other reasons

- ◆ Do all we can to sustain a tenancy. This will include working with internal departments, external agencies and our customers
- ◆ Work to support all customers according to their needs, making specific provision for customers with vulnerabilities
- ◆ Make available options for transfer and exchange

3.2 For our communities, we will:

- Make the best use of our stock and build balanced and sustainable communities.
- Provide tenancies and terms of occupation which are compatible with the purpose of our housing stock, the needs of the individual, the sustainability of the community and the efficient use of our homes

3.3 For our colleagues and stakeholders, we will:

- ◆ Meet the requirements set out by our regulator.
- ◆ Work with Local Authority and other partners to help meet local housing need
- ◆ Participate in Choice Based Lettings (CBL) and nominations agreements

4. Impact Assessments and Key Considerations

1. Customers

- a. We aim to increase our customer satisfaction levels by having an accessible and efficient allocations and lettings process and offering good quality homes
- b. This policy takes account of the diversity of our residents in offering a range of properties to suit different customer needs and changing circumstances as well as providing mechanisms to support vulnerable customers
- c. Across GreenSquareAccord, we work in partnership to maximise opportunities in order to achieve value for money and choice of property for customers. Customers' options are often limited by affordability so we offer a range of homes to help us make most efficient use of our housing stock whilst giving customers options which suit their circumstances
- d. We will ensure that no person or group of persons will be treated less favourably than another person or group of persons on account of any diversity strand or protected characteristics.
- e. We will also ensure our customers have fair access to our homes and will provide translation services when required.

2. Communities

- a. Tenancy sustainment lies at the heart of our approach to allocations and lettings, ensuring we take account of individual and local circumstances when allocating and letting properties.
- b. We will participate in local lettings schemes where these are appropriate and approved. Although we generally offer lifetime tenancies, our approach allows for periodic reviews at tenancy start up and during the tenancy, to ensure that other housing options are made available to customers to release rented accommodation for those in greatest need

- c. We are committed to working with local community organisations and representatives to ensure that housing is allocated and support services are managed in ways that meet the needs of the community and help sustain tenancies. Emphasis will be placed on working with applicants prior to becoming our customers in terms of tenancy sustainability, to ensure the right people are housed in the right properties

3. Planet

- a. To support our move to carbon neutrality and to be as responsive to customers' needs as possible we aim to collect the email addresses and mobile phone numbers of our customers so we can communicate effectively and with reduced printed paperwork. Our commitment to locality working means we will seek to reduce travel wherever possible
- b. We will also aim, wherever possible, to ensure our properties either meet current environmental standards, inside and out, or are included on improvement plans, to minimise impact on the environment but also to reduce fuel poverty
- c. We will work to use paper-free allocations and lettings processes where possible and practical

4. Governance

- a. Board approval is required for this Allocations and Lettings Policy
- b. We will review this Policy in line with any changes to the Tenancy Standard as published by the RSH and in line with prevailing good practice
- c. As part of our commitment to deliver an economical, efficient and effective service, we will use external benchmarking services and best practice groups to monitor our costs and service outcomes.
- d. We will ensure that in handling the personal data of our customers and applicants we will abide by the UK GDPR and Data Protection rules

5. Partners

- a. Across GreenSquareAccord, we will work in partnership to maximise the opportunities for our customers to access good quality homes. Where appropriate to do so we will participate in Choice-Based Lettings (CBL) and nomination arrangements with local authorities in the areas where we operate and we will make available opportunities for transfers and exchanges through our membership of HomeSwapper UK (or alternatives) and in partnership with other registered providers.
- b. We may also make use of external agencies to provide information, advice and guidance to our customers
- c. We are committed to working to prevent discrimination and to proactively assist all those who may find it difficult to obtain good quality housing. In particular, we will work with representative organisations to assist them to meet the housing needs of the groups they represent.
- d. We will assist local authorities and other partners to prevent and reduce homelessness

6. People

- a. We will make sure our people are appropriately trained and understand how to implement this policy

5. Definitions

ASB	Anti-social behaviour.
CBL	Choice based lettings – the system by which most Local Authorities make nominations to properties.
Housing First	An initiative where a homeless individual is provided with a home and support to sustain a tenancy
RSH	Regulator of Social Housing
Section 106	A planning obligation under Section 106 of the Town and Country Planning Act 1990 (as amended). The common uses of planning obligations are to secure affordable housing, and to specify the type, timing and restrictions of this; and to secure financial contributions to provide infrastructure or affordable housing.
General Needs	Homes which are let to individuals or household with no additional needs
Sheltered housing	Housing for older people where some level of additional support and staffing is provided and where there is usually communal space
55+	Housing for older people where no additional support is given
Social Rent Tenancies	This is a tenancy where the rent is set at up to 80% of the gross market rent (including service charges)
Affordable Rent Tenancies	This is a tenancy where the rent is set according to the Rent Standard of the RSH and where service charges can be set separately
Fixed Term Tenancies	Tenancies which are granted for a fixed term of at least 6 months
Lifetime Tenancies	Tenancies which are granted for an indefinite period
Intermediate Rented homes	A tenancy let at a subsidised rent (usually 80% of the market rent) to allow the occupant to save for a deposit to buy the home
Starter Tenancy	This is fixed term tenancy – usually for 12 months – to trial whether the tenancy can be sustained in the longer-term
Co-operatives	Homes which are managed by and for their members
Right to Rent	The Right to Rent scheme requires landlords to check that all tenants who occupy their properties have legal status to live in the UK.

6. Our Policy

6.1 Policy Statement

One of the principal purposes of GreenSquareAccord is to provide housing for people in housing need and to create communities where people want to live. An effective and fair allocations policy is essential to the creation of a stable and sustainable community. GreenSquareAccord is committed to this ideal. By allocating housing that is appropriate and fit for the needs of customers, people will be encouraged to stay in their properties, which will enable sustainable communities to develop

Through development and the management of our existing stock we create quality new homes and sustainable communities where people can enjoy happiness, health and prosperity – the vital foundations for successful and fulfilling lives.

6.2 Policy Outline

- ◆ This policy sets out how we allocate and let our properties, providing options for customers to transfer, exchange or access other moves. It also sets out circumstances where we will consider not offering a property to an applicant

- ◆ Due to the varied nature and availability of social housing and the different approaches of local authority partners, it is important that we can adopt different procedures when allocating our own stock. This policy supports such an approach and identifies the various ways in which homes are allocated.

7. Scope of Policy Exclusions

This policy applies to customers in the following categories: general needs, sheltered, over 55's housing and intermediate rent. It does not apply to any housing for sale, shared ownership or housing with care and/or support managed by our Care and Support Directorate, the exceptions being "Housing First" lettings and lettings to supported housing customers who wish to live in a general needs properties

For tenants and applicants to fully mutual co-operatives, individual allocations and lettings policies apply.

For details of the types of tenure and tenancies available, please refer to the Tenancy Policy.

GreenSquareAccord allocates its general needs stock in one of the following ways:

- ◆ Choice Based Letting schemes (CBLs)
- ◆ Nominations
- ◆ Direct Waiting List
- ◆ Transfers, Mutual Exchanges and Management moves
- ◆ Referrals and Move-Ons
- ◆ Local Lettings Plans

In some areas, stock may be allocated in only one or two of these ways. For example, in areas where we have limited numbers of properties, allocations will be made exclusively via the nominations procedure or CBL.

We generally let properties through Local Authority CBL schemes or via Local Authority nomination agreements

We make best use of our stock in some Local Authority areas by re-letting via a 'management move' or a 'direct let' outside of Local Authority allocations schemes.

We may also let homes outside of a Local Authority's policy where there is a need for a local lettings plan or sensitive let. These will be agreed with the appropriate local authority to create sustainable communities.

For existing secure and assured tenants, we will promote, and offer advice to assist with mutual exchanges as outlined in the Tenancy agreement and our Tenancy Policy and Mutual Exchange Procedure.

7.1 Applicant Eligibility

- (i) Any person can apply for a GreenSquareAccord property although there are circumstances where we may refuse to consider an applicant. We will undertake a comprehensive single assessment of a prospective tenant's status including their ability to afford the property on offer and this will take account of all household finances, not just the housing costs in isolation, in order to assess if a person is in housing need. Where appropriate this may include the requirement to submit to a direct benefit assessment (either on-line or otherwise). As the assessment process is comprehensive, we will make only one offer of suitable accommodation.

If this assessment shows that the prospective tenant is not in a position to afford and sustain the tenancy, they will not be offered the property in question. Instead, they will be advised about more affordable options suitable to their needs. Alternatively, if a prospective tenant has sufficient equity and/or income to purchase their own home or secure private accommodation, they will not be eligible for one of our affordable or social rent properties but may be considered for an intermediate rental home

(ii) Applicants must usually have no housing related debt, which could include rent or mortgage arrears, both current and former, from a previous landlord even if the arrears are due to a shortfall in benefits due to under occupation or non-dependant charges. If an applicant presents with debt, then a risk assessment will be undertaken and an application to our own or a local authority hardship fund may be made and an tenancy offer made only if appropriate to do so, based on evidence of the following circumstances:

- Tenants have made an arrangement to pay which they can demonstrate they have adhered to for at least 6 months
- Arrears were accrued as a result of a lack of tenancy support and they were a sole tenant.
- Applicants are identified as at risk of suffering financial hardship if they remain in their current home and the applicant can demonstrate the affordability of all their existing financial commitments in addition to all costs relating to the property they have applied for and they have made an Arrangement to clear any debts with their former landlord, even if this payment arrangement is less than 6 months old.
- There is an overriding need, such as a high medical need, which has resulted in a home becoming unsafe for a resident or impossible for them to enter or exit safely.
- The debt has accrued as a result of fleeing Domestic Abuse and this is supported by a relevant supporting agency, statutory or otherwise.
- Where residents require smaller accommodation, we will offer advice on how to facilitate this. If there are rent arrears or other debts owed to us, the application must be referred to the Income Manager/Locality Manager.

(iii) As a rule, allocations will only be made to applicants 18 years. Applications from people aged between 16 and 18 years will of age and over will be considered in exceptional circumstances and in such cases, a guarantor will be required.

(iv) GreenSquareAccord wishes to optimise the best use of its stock and offer homes of a suitable size to meet housing need and the needs of individual applicants.

We will consider allowing a property to be under-occupied where the individual circumstances of the applicant requires it, and the applicant is aware of the need and is prepared to pay the additional rent not covered by the housing costs element of Universal Credit (or equivalent benefit), where relevant

(v) Intermediate Rent Tenancies – Applicant eligibility

- a) The objective of intermediate rent accommodation is to provide homes for local workers on limited incomes who aspire to become homeowners in the future but who may be facing difficulty raising mortgage finance.
- b) Applicants for intermediate rent properties are subject to the Intermediate Rent Eligibility Criteria and applications should be made through a designated "Help to Buy Agent".

- c) Applicants must have a clear rent account or maintained a payment agreement for 13 consecutive weeks where the initial arrears were £999 or below or 26 consecutive weeks where the initial arrears were £1,000 or more. A financial assessment will be carried out and applicants will not be offered accommodation where they are unable to afford a property.
- d) order to ensure fairness in allocation, applicants are assessed against the criteria outlined below. All applications will be logged and kept in date order. When a suitable property becomes available, applicants who fulfil at least one of the criteria in each section may be offered a property (subject to satisfactory references, financial assessment and interview):

Personal Circumstances

- ◆ currently living with family
- ◆ need to move following a relationship breakdown and have a housing need
- ◆ currently living in rented accommodation (subject to satisfactory references from former landlord)

Employment

- ◆ work within the Local Authority where the scheme they want to live is situated
- ◆ work within an adjoining Local Authority area close to where the scheme they want to live is situated
- ◆ due to commence work in Local Authority area where the scheme they want to live in is situated

Residency

- ◆ live within the Local Authority where the particular scheme they want to live is situated
- ◆ live within a bordering Local Authority area
- ◆ need to move to give or receive support

Financial Circumstances*

- ◆ a satisfactory credit report
- ◆ earnings from employment (no state benefits allowed) which covers all household expenditure and leaves a disposable sum of approximately £200 per month
- ◆ joint annual household income of up to approximately £60,000

(vi) Rehousing of colleagues, board members and their relatives

Any application made by employees and/ or their close relatives, contractors, board members and their close relatives are permissible so long as the decision is made fairly and in strict accordance with this policy. To ensure fairness, any offers of accommodation will require internal sign off by the relevant Executive Director

(vii) Applicants Ineligible for Social Housing

We reserve the right to let to applicants who ordinarily would not be eligible for social housing but who fulfil the aims of our charitable status. This could be in the following circumstances:

- ◆ Where we have hard to let properties and are unable to let via the Local Authorities CBL system.
- ◆ This is a requirement of the S106 or local lettings plan.
- ◆ A varied tenure mix is required to create a balanced or sustainable community.

Hard to let properties will be let on this basis and advertised via our website, the local press or property websites such as Rightmove. Our usual pre tenancy checks and Tenancy Policy will apply.

(viii) Right to Rent

We will only house applicants who have permanent or limited leave to remain in the UK in order to meet legal requirements under the Immigration Act 2014 (as amended by the Immigration Act 2016). The following documents must be seen prior to offering a tenancy:

- ◆ A copy of the passport.
- ◆ A copy of the documents included in an application to renew leave to remain; and
- ◆ Immigration Status document provided with asylum decision; or
- ◆ Letter from the Home Office or UKBA confirming eligibility.

If the applicant has limited leave to remain, any offer of accommodation will be regarded by us as non-secure and cannot be used as permanent accommodation or permanent status for benefit entitlement, for example. In these situations, a temporary, non-secure Tenancy will be granted (please see Tenancy Policy).

7.2 Choice-based Lettings (CBL)

- (i) In most local authority areas we let our homes via CBL. Applicants are entitled to bid for properties advertised and we will offer accommodation in accordance with the allocation process of the particular CBL. Applicants are entitled to apply for properties via a CBL whilst also being on a direct waiting list.
- (ii) The same eligibility rules for all applicants will apply, including a comprehensive single assessment to ensure that the offer of accommodation is right first time. Where there is debt or former tenant arrears, or other tenancy breaches in a previous or current tenancy, we may refuse to accept the bid. We will only refuse bids in exceptional circumstances.

7.3 Nominations

- (i) Section 167 of the Housing Act 1996 (the Act) requires local authorities to have a scheme in place for determining the priority and procedure for allocating housing.

Section 170 of the Act 1996 requires registered providers to co-operate to such an extent as is reasonable in the circumstances in offering accommodation to people with priority on the local authority's housing register. The RSH requires registered providers to make available at least 50% of their properties of publicly-funded stock to nominees of the local authority.

- (ii) GreensSquareAccord accepts nominations from a number of local authorities to discharge its duties and we have entered into nomination agreements with the local authorities in which our stock is situated. When allocating homes to nominees, we will adhere to the appropriate nomination agreement and will work with relevant local authorities, other registered providers, or supported housing agents to agree appropriate nominations agreements for priority applicants.
- (iii) All new build properties will be let via the Local Authority CBL schemes unless they are unable to provide a nomination, in which case we may make a direct let.
- (iv) The same eligibility rules for direct waiting list applicants will apply, as above. Where there is debt or former tenant arrears, or other tenancy breaches in a previous or current tenancy, we may refuse to accept the nomination. We will only refuse nominations in exceptional circumstances.
- (v) A Local Authority may also nominate an applicant outside of their CBL system. This is explained in the Management transfer, direct let and direct nomination procedure. This is usually when the property is or can be adapted for the applicant's specific needs.

7.4 Direct Waiting List

- (i) In certain areas where we have properties that we consider Hard to Let and in local authority areas where 100% nomination rights do not apply, GreenSquareAccord operate waiting lists, where applicants can apply; schemes and communities with high demand will be closed periodically.
- (ii) When allocating properties to people on its waiting list, our aim is to house people in housing need whilst ensuring tenancies will be sustainable in the long term and contribute to settled communities.
- (iii) Lettings Officers may also consider a direct let where this will make best use of our stock, create sustainable communities, maximise income or reduce cost to the business.

Advertisement of these properties may be via our website, local newspapers, Local Authority 'Open Market' Registers and property websites e.g., Rightmove.

7.5 Transfers, Mutual Exchanges and Management Moves

(i) Transfers

Existing customers of GreenSquareAccord are entitled to apply for a transfer to another property within our stock. Further details can be found in our Mutual Exchange and Transfers policy.

(ii) Mutual Exchanges

We provide a free subscription for all GreenSquareAccord customers to an online national home swap service provider (Homeswapper).

(iii) Management Moves

Housing Officers may make a request for an urgent move of an existing customer where qualifying criteria are met

7.6 Referrals and Move-ons

GreenSquareAccord accepts referrals from organisations working with special needs groups, as well as on an intra-group basis from our health, social care and supported housing services. Referrals will be accepted on behalf of the applicants through the direct waiting list and due regard will be given to the priority of such applicants.

The same eligibility rules for direct waiting list applicants will apply, including a comprehensive single assessment to ensure that the offer of accommodation is right first time. This is especially important for referrals and move on as we have a commitment to ensure our customers make a move to appropriate independent housing when they are ready to do so. It is important to us that any risk assessment is used in a positive way to ensure that we support our customers to move to independent living and not as a barrier.

7.7 Local Lettings Plans

- (i) We will work with Local Authorities to develop our local lettings plans, to help create balanced and sustainable communities. This includes homes which are subject to a S106 agreements as well as those that are not. This may apply to both new and existing communities.
- (ii) The purpose of a local lettings plan will be to ensure sustainable lettings in a clear and transparent way. The Plan will require the approval of the Local Authority and a Head of Service.

(iii) The Local Lettings Plan will include the following:

- ◆ why a plan is needed
- ◆ the aim of the plan
- ◆ who has been consulted about the plan
- ◆ the make-up of the scheme and locality
- ◆ transport links, shops & facilities, health services and alternative housing options
- ◆ the profile of the locality

Scheme specific lettings' criteria will be included to ensure that the aim of the plan(s) is achieved. This may mean that our priorities for rehousing may differ from this policy and we reserve the right to do this in these circumstances. Outcomes of the plan(s) will be measured periodically by the Head of Service or equivalent Senior Manager to see if it has achieved its ambitions and to review its role going forwards.

A copy of any local lettings plan will be available for staff, Local Authorities, prospective and current customers on request.

7.8 Refusals and Suspensions

(i) Only in exceptional circumstances will we refuse applications for housing. Grounds for refusal may include:

- ◆ where an individual does not have the Right To Rent, unless they meet the criteria of the habitual residence test as defined in s.161 of the Housing Act 1996 and the Allocations of Housing Regulations 1996 (s1 1996 no:2753) as amended by the Homelessness Act 2002
- individuals or households who have been served with a Notice of Seeking Possession by their current or previous landlord for anti-social behaviour related issues in the 2 years or who have a current Anti-Social Behaviour Order (or the prevailing equivalent) or an Injunction, or have been the subject of one in the 2 years prior to the application date and where, after the single assessment, they are not able to demonstrate an ability to conduct themselves properly
- ◆ where a single assessment shows a person is likely to pose a risk to their household, neighbours and/or wider community and this has been confirmed by an 'authoritative source' such as the Police or agencies such as Probation, Social Care Services or Education Welfare
- ◆ where an applicant(s) has (have) sufficient income and/or free equity from a property currently owned or sold to secure accommodation in the private rented sector or maintain mortgage repayments. Under these circumstances, the applicant(s) can be considered for intermediate rent.
- ◆ For the purposes of this policy, applicants will only be eligible if the household income is below average for the area where the property is located or on benefits. Any free equity is a matter that will be taken into account on a case by case basis.
- ◆ Local discretion will be applied based on a full affordability assessment, taking into account the cost and availability of other housing options.

(ii) Applicants can also be suspended or removed from the waiting list for the following reasons:-

- ◆ Providing false information – it is a criminal offence for a person to withhold information or provide false information in relation to any application to be housed

- ◆ If the individual's circumstances have changed since applying for accommodation and they are no longer in housing need
- ◆ If they refuse a reasonable suitable offer of housing

(iii) The suspension period will be for no more than two years. Where the application is suspended, it will be reviewed periodically but the onus is on the individual to reapply.

Where we do not accept an application or where the applicant is suspended, we will inform them in writing setting out:

- ◆ our reasons
- ◆ duration of any suspension
- ◆ what needs to happen for them to be able to have a home from us
- ◆ provide customers with other agency and local authority information
- ◆ tell them they have the right to appeal

(v) It is highly unlikely we would house an applicant who owns or has a legal interest in a property. In individual exceptional circumstances we may consider applicants who own a property. These include:

- ◆ The property has been or is about to be repossessed and there are insufficient funds to rent on the open market.
- ◆ The homeowner has fled a property due to domestic abuse and are found by the local authority to be eligible for housing. In cases such as these we may consider granting a Fixed Term Tenancy.
- ◆ The property has become unsuitable due to disability, the homeowner is unable to make the required adaptations and is unable to secure DFG (Disabled Facilities Grant) from the Local Authority to carry out the necessary works.
- ◆ The applicant has left the property because of a relationship breakdown and they can demonstrate they have insufficient funds to rent or buy on the open market.
- ◆ The property in question is a mobile home / caravan

7.9 Appeals Process

GreenSquareAccord will ensure that housing applicants have the right to appeal against decisions at every stage of the process. Appeals will be dealt with through the designated Service Manager.

8. Roles, Responsibilities and Duties

8.1 Executive

The Executive Director of Communities is responsible for:

- ◆ the regular review, implementation and monitoring of this policy and for reporting to boards and committees as required.
- ◆ negotiating strategic partnerships with local authorities and other partners
- ◆ oversight on internal and external audit reports and for providing board assurance in relation to regulatory compliance
- ◆ Approving reports for staff and or board member rehousing

8.2 Head of Service

Heads of Service are responsible for:

- ◆ liaison with local authority and other RPs in relation to CBL, nomination agreements and allocations and lettings strategies
- ◆ seeking agreement from local authorities for the use of Local Lettings Plans

- ◆ overseeing any Appeals
- ◆ agreeing discretion in relation to reasons for accepting, refusing or suspending applicants
- ◆ participating in external benchmarking
- ◆ providing local reporting -eg to co-op partnership boards
- ◆ ensuring that team responsibilities are reflected in meetings and performance reviews, and appropriately covered within departmental business plans, standard operating procedures, contingency plans and strategies.

8.3 Departmental Managers

Departmental Managers are responsible for:

- ◆ approving single needs assessments
- ◆ investigating any Appeals
- ◆ approving offers management moves, transfers and move-ons
- ◆ preparing reports for staff and or board member rehousing
- ◆ ensuring staff are well-trained and supported to deliver
- ◆ preparing information for reporting and monitoring purposes
- ◆ monitoring that standards are complied with
- ◆ take action where data standards fall below those expected

8.4 Operational Staff

Operational staff are responsible for:

- ◆ Liaising with local authority and partner staff regarding nominations and CBL applications
- ◆ Preparing adverts and updating CBL and other websites
- ◆ Supporting applicants to apply for housing
- ◆ Processing applications and managing any direct writing lists
- ◆ Contacting applicants to arrange assessments and property viewings
- ◆ Undertaking tenancy checks and housing options interviews with customers
- ◆ Approving mutual exchanges
- ◆ Investigating instances of tenancy fraud
- ◆ Supporting customers and / or signposting in relation to tenancy sustainment

8.5 Working Groups

Working Groups will be set up as and when to consider improvements and changes to this policy and other associated policies and procedures

8.6 All Staff

Every member of staff is responsible for:

- ◆ delivering a customer-led service and for suggesting ways to improve and enhance the customer experience;
- ◆ preventing and / or responding effectively to complaints and concerns
- ◆ Recording information in a timely and accurate way having regard to UK GDPR, Data Protection rules and the Data Quality policy
- ◆ Staff must ensure that they comply with the requirements of this and other policies and procedures relating to their role

9. Monitoring and Reporting

9.1 Data Recording

The fundamental principle of data quality and recording is that data should be right first time, which means that the responsibility is held at the point at which it is collected and recorded, whether the person recording the information is clinical, technical or clerical.

All staff are responsible and accountable for the quality of data they collate and record.

Staff must ensure that they complete the appropriate continuous recording of lettings and sales in social housing in England (referred to as CORE) reporting returns. This collection provides all of the statistical information that the Ministry of Housing, Communities and Local Government produces on social housing lettings and includes:

- ◆ trends in social housing lettings over time
- ◆ characteristics of tenants with new social housing lettings
- ◆ types of tenancy agreements

Annually the NROSH+ return will be completed and submitted. NROSH+ is the data collection website of the Regulator for Social Housing (RSH) in England, through which it collects regulatory data and information from registered providers of social housing.

9.2 KPIs

In addition to standard KPI's for re-let times and voids we will monitor:

- ◆ Average length of length of tenancy
- ◆ Customer satisfaction with new lettings: the home and the process
- ◆ Number of properties where get a "fail to nominate"
- ◆ Number of property refusals with reasons

9.3 Monitoring Effectiveness

Regular reviews will be undertaken to assess the use and implementation of this policy and that it is meeting business plan and organisational objectives

We will regularly monitor the effectiveness of nominations and CBL arrangements

9.4 Reporting Fora and Frequency

(i) Internally

- ◆ Monthly performance reports at individual and team level
- ◆ Quarterly Executive team reports at Directorate level
- ◆ Quarterly Committee reports at Directorate level
- ◆ Board reports at Directorate level (frequency to be determined)
- ◆ Reports for Customer Panels (frequency to be determined)

(ii) Externally

- ◆ Local authority nomination and lettings returns as required
- ◆ CORE forms quarterly
- ◆ NROSH+ annually
- ◆ National Tenancy Fraud returns annually

10. Quality Assurance

10.1 Internal Audit

Adherence to this policy will be routinely assessed – on a risk-based basis - by the internal audit function.

In addition, line managers should ensure that regular spot checks are carried out to identify and remedy any issues

10.2 External Audit / Validation

Adherence to this policy may be audited / validated by the following external bodies:

- ◆ Homes England via scheme development reviews
- ◆ RSH via In-Depth Assessment

10.3 Service Standards

Customers will be involved in developing service standards and in monitoring and scrutinising performance

11. Communication, Training and Implementation

- ◆ Line managers will ensure that this policy and any team responsibilities are communicated as appropriate and reflected in meetings and performance reviews, and appropriately covered within departmental business plans, standard operating procedures, contingency plans and strategies. Staff may be asked to confirm they have received and understood the details of this policy
- ◆ Where policy reviews, audits or performance indicate the need for whole-scale change, then a fit-for-purpose implementation project plan will be produced and delivered.
- ◆ All staff will receive adequate training in the use of policies, documentation, systems and records required as part of their role. Induction, supervision and appraisal processes will be used to monitor staff's understanding and compliance with expectations.
- ◆ Where anomalies indicate changes are needed to training programmes, changes will be made to reduce the risk of recurrence and ensure expected standards are clear.

12. Legal and regulatory framework

The RSH states that, Registered providers shall clearly set out, and be able to give reasons for, the criteria they use for excluding actual and potential tenants from consideration for allocations, mobility or mutual exchange schemes.

Registered providers shall also develop and deliver allocations processes in a way which supports their effective use by the full range of actual and potential tenants, including those with support needs, those who do not speak English as a first language and others who have difficulties with written English.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419209/Tenancy_Standard_2015.pdf.

In addition we are guided by the specifics of housing law, including, but not limited to:

- ◆ Housing Act 1988
- ◆ Housing Act 1996
- ◆ Localism Act 2011
- ◆ Homelessness Act 2002
- ◆ Equality Act 2010
- ◆ UK Data Protection Act 2018
- ◆ Human Rights Act 1998
- ◆ The Localism Act 2011
- ◆ The Welfare Reform Act 2012

13. Information Sharing and Confidentiality

- 13.1** Management information produced from tenant/ customer data is essential for the efficient running of GreenSquareAccord and to maximise utilisation of resources for the benefit of tenants, customers and staff. It supports making effective decisions about the deployment of resources, and also in demonstrating the value of the services provided
- 13.2** In addition to its housing services, GreenSquareAccord operates a significant number of care and support services which require high levels of personal and sensitive data being appropriately recorded and managed. High quality information means better care, support and customer safety, and there could be potentially serious consequences if information is not correct and up to date, both for customers and for the organisation as a whole.
- 13.3** GreenSquareAccord is committed to protecting the Confidentiality, Integrity and Availability of all Personal Data that it holds and to complying with all of the necessary Data Protection Laws in line with the highest standards of ethical conduct.
- 13.4** Data must be stored securely and processed in line relevant legislation and Accord procedures in relation to confidentiality. All staff must pay due regard to where they record information, what they record, how they store it and how they share information ensuring that they comply with national and local requirements, policies and procedures.
- 13.5** We will only allow the transfer of Personal Data from, or allow access to, Third Parties when it is assured that the information will be processed legitimately and protected appropriately by the Third Party.