



West Granton

Housing Co-op

sustaining and championing the co-operative way

ALLOCATION POLICY

This policy was approved by the Committee of Management on 21st April 2021. It should be reviewed again no later than 2024.

The policy has been assessed through the organisational impact assessment process.

We can, if requested, produce this document in different formats such as larger print or audio-format. We can also translate the document into various languages, as appropriate.

SCOTTISH HOUSING REGULATOR STANDARDS

STANDARD 1:

The governing body leads and directs the RSL to achieve good outcomes for its tenants and other service users.

STANDARD 2:

The RSL is open about and accountable for what it does. It understands and takes account of the needs and priorities of its tenants, service users and stakeholders. Its primary focus is the sustainable achievement of these priorities.

STANDARD 4:

The governing body bases its decisions on good quality information and advice and identifies and mitigates risks to the organisation's purpose.

STANDARD 5:

The RSL conducts its affairs with honesty and integrity.

STANDARD 6:

The governing body and senior officers have the skills and knowledge they need to be effective.

WEST GRANTON HOUSING CO-OPERATIVE LIMITED
26 Granton Mill Crescent Edinburgh EH4 4UT
Tel: 0131 551 5035 Email: mail@westgrantonhc.co.uk



West Granton Housing Co-operative Limited is a fully mutual housing co-operative registered as a social landlord with the Scottish Housing Regulator (HAC 225); and is a registered society under the Co-operative and Community Benefit Societies Act 2014 (2357 RS).



Contents

1.0	Allocation policy: strategic aims	5
1.1	Summary	5
2.0	Key allocation policy objectives	5
2.1	Summary	6
3.0	Law, regulation and guidance: a summary	6
3.1	Relevant Law covering allocations.....	6
3.2	What the law says: Access to the common housing register	6
3.3	What the law says: Allocation policy consultation.....	7
3.4	What the law says: Groups given reasonable preference when allocating houses.....	8
3.5	What the law says: Factors we need not take into account when allocating houses....	8
3.6	What the law says: Rent arrears	8
3.7	What the law says: Home ownership.....	9
3.8	What the law says: Residency	9
3.9	What the law says: Other restrictions.....	9
3.10	What the law says: Allocation information and publicity.....	9
3.11	What the law says: Entitlement to access information	9
3.12	What the law says: Suspending offers of housing	10
3.13	Regulatory standards.....	10
3.14	Summary.....	10
4.0	Allocation: our system.....	10
4.1	Our internal transfer Group system.....	11
4.2	Our housing groups.....	11
4.2.1	<i>Edinburgh Council referrals</i>	11
4.2.2	<i>Other agency referrals (partnerships with other housing providers and non-housing agencies)</i>	12
4.2.3	<i>Other lets</i>	12
4.2.4	<i>Internal transfers (existing tenants)</i>	12
4.2.5	<i>Management transfer moves (existing tenants) / Exceptional decisions</i>	12
4.3	Edindex common housing register and choice-based lettings	12
4.3.1	<i>Starters are homes for people who are:</i>	13
4.3.2	<i>Movers are homes for people who are:</i>	13
4.3.3	<i>Urgent Gold Priority</i>	13
4.3.4	<i>Gold Priority</i>	13
4.3.5	<i>Silver Priority – Homelessness</i>	13
4.3.6	<i>Silver Priority – Overcrowding</i>	13
4.3.7	<i>Silver Priority – Under occupancy</i>	14
4.4	How to Bid	14
4.5	Our suspension policy	14
4.5.1	<i>Offers to transfer applicants</i>	14
4.5.2	<i>Applicants and breaches of tenancy</i>	15
4.5.3	<i>Suspension of Edindex applicants</i>	16

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

4.6	Withdrawing, bypassing or not proceeding with the application process.....	16
4.7	Other relevant policies.....	17
4.8	Summary	17
5.0	Allocation procedures and Rules.....	17
5.1	Housing need	18
5.2	Admission to our internal transfer list.....	18
5.3	Prioritisation of transfer applications	18
5.4	Other groups.....	20
5.5	Verification of application details (pre-offer stage).....	20
5.6	Allocation stage	21
5.7	Other specific rules applied to both Internal and Edindex Applicants	21
5.7.1.	<i>Accessible housing.....</i>	<i>21</i>
5.7.2.	<i>Access and fostering.....</i>	<i>21</i>
5.7.3.	<i>Antisocial Behaviour Order (ASBO)</i>	<i>21</i>
5.7.4	<i>Priority and date of application - EdIndex.....</i>	<i>21</i>
5.7.5	<i>Priority and date of application – WGHC internal transfer.....</i>	<i>22</i>
5.7.6.	<i>Rehousing registered sex offenders.....</i>	<i>22</i>
5.7.7	<i>Occupancy standard</i>	<i>22</i>
5.7.8	<i>Under occupation</i>	<i>24</i>
5.7.9	<i>Taking future household needs into account.....</i>	<i>24</i>
5.7.10	<i>Downsizing and number of bedrooms.....</i>	<i>24</i>
5.7.11	<i>Pets</i>	<i>24</i>
5.7.12	<i>Quality control through audits.....</i>	<i>24</i>
5.7.13	<i>Refusal of offers.....</i>	<i>25</i>
5.7.14	<i>Reviews and cancellations</i>	<i>25</i>
5.7.15	<i>Summary</i>	<i>25</i>
6.0	Staff training.....	26
7.0	Allocations and social justice.....	26
7.1	General practices to promote social justice	26
7.2	Specific practices to promote social justice.....	26
7.3	Summary	26
8.0	Performance management	26
8.2.	Summary	27
9.0	Appeals or complaints.....	27
9.1	Complaints.....	27
10.0	Consultation and review of policy.....	28
10.1	Review of allocation policy.....	28
10.2	Summary.....	28
11.0	Appendices	28
11.1	Appendix 1:	29

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.2	Appendix 2: Legal and guidance framework.....	33
11.3	Appendix 3: Other relevant information.....	34
11.3.1	<i>Our housing stock profile.....</i>	<i>34</i>
11.3.2	<i>our lettings plan;</i>	<i>35</i>
11.4	APPENDIX 4: Lettings Restrictions Criteria	38
11.5	APPENDIX 5: The Scottish Social Housing Charter.....	39

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

1.0 Allocation policy: strategic aims

This Allocation policy is implemented through our housing management service but is a policy with objectives that are linked to our organisational governance. This is explained by reference to four factors:

- Firstly, we promote equality and social inclusion objectives through our allocation policy by addressing any form of discrimination. This is explained in detail in Section 7.
- Secondly, we promote sustainable tenancies and the prevention of homelessness through working with a range of housing partner organisations. A list of our partner organisations and information about the common housing register, EdIndex, is provided in Appendix 1.
- Thirdly, income through rents is an essential part of our financial governance framework. We allocate our houses quickly in line with targets, therefore, in order to maximise income.
- Finally, our allocation policy is linked to our strategic governance objective of meeting housing law and relevant quality standards. For instance, we provide quality housing by ensuring that our houses meet the Scottish Housing Quality Standard. Again, the allocation policy is based on housing law and relevant guidance (see Section 3).

Note: West Granton Housing Co-operative is referred to generally as “we” or “WGHC” throughout this policy.

1.1 Summary

We implement our allocation policy through our housing management service, but its scope is strategic in nature. Strategic governance objectives promoted by allocations include social justice, sustainability and quality housing standards.

2.0 Key allocation policy objectives

This section covers our 12 key allocation policy objectives which are comprehensive and holistic in nature as they cover a range of organisational activities.

WGHC:

- meet relevant legal and regulatory standards, including promoting allocation guidance;
- include equality issues throughout allocation services, a process generally referred to as “mainstreaming of equality;”
- offer housing applicants advice and information about their housing prospects and options, upon request from/by them;
- develop an area in which people want to live and work (“sustainable community”);
- define housing need and address various types of housing needs, including applicants’ choices and aspirations;
- let houses against quality housing standards (“our letting standard”) and in line with targets to maximise income;

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

- make best use of the housing stock, including reducing under-occupation and recognising housing need and aspirations, as appropriate;
- work with a range of housing partners through the common housing register to promote sustainable communities in West Granton;
- manage allocation performance through a range of performance indicators;
- provide staff training to promote effective implementation of the allocation policy;
- offer housing applicants advice and information about our internal appeal system or complaint system; and
- review our allocation policy every four years or sooner, as required, for example, because of legal changes or new guidance.

2.1 Summary

Section 2 explains our allocation objectives and is, therefore, the essential part of this document. Our objectives are the basis upon which we develop our allocation service.

3.0 Law, regulation and guidance: a summary

This section summarises key sections of allocation law and refers to regulatory standards and allocation guidance. It is emphasised that this section is for the guidance of readers only and is not intended as a precise statement of law.

Appendix 2 provides information about sources of allocation law and allocation guidance. It also provides information about other laws that are relevant to allocation practice.

3.1 Relevant Law covering allocations

Allocation law covers a range of issues, including suspensions. This is explained separately given its complexity.

Section 3 covers the following issues:

- access to the common housing register (EdIndex);
- allocation policy consultation;
- groups to be given reasonable preference when allocating houses;
- factors we must not take into account when allocating houses;
- rent arrears;
- home ownership;
- residency;
- other restrictions;
- allocation information and publicity; and
- entitlement to access housing application information.

3.2 What the law says: Access to the common housing register

Any housing applicant who is **sixteen** years or over may register on our common housing register. UK legislation sets out eligibility for persons who are not UK citizens and this can depend upon various factors such as:

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

- Nationality (including that of family members);
- Economic activity of the applicant and that of family members;
- Immigration status and rules around asylum / immigration; and,
- Entitlement to public funds

All requests to register from persons who are not UK citizens will be assessed in accordance with current legislation and guidance.

The right to be admitted to the register differs from the right to be allocated a property. Therefore, being registered does not give applicants an automatic entitlement to receive offers of housing.

3.3 What the law says: Allocation policy consultation

As well as being required to make and publish an allocation policy, we have specific duties relating to consultation.

Before making material changes to this policy, we must consult with the following persons, as appropriate:

- housing applicants for our area;
- our tenants;
- any registered tenant organisations; and
- any other organisations / persons that we believe we should consult with.

We must also consult with housing applicants in our area and other organisations about:

- our priority groups when letting houses; and
- our policies on transfers and exchanges.

After the formal consultation is ended, we must prepare and publish a report. This report must cover specific matters, including the method of consultation and the issues we consulted on. In developing our consultation process, we take account of the accessibility requirements of persons with whom we consult.

For instance, we make reasonable adjustments when providing information to disabled applicants so that this information is linked, as appropriate, to their specific needs. This approach, it is noted in passing, promotes the Scottish Housing Regulatory Standard concerning equality and diversity.

Note: We may consider the following documents when revising our allocation policy:

- Edinburgh City Council housing strategy; and
- any other allocation guidance produced by the Scottish Government.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

3.4 What the law says: Groups given reasonable preference when allocating houses

Allocation law does not identify specific groups that must be offered housing. But it specifies groups of applicants to whom we must give reasonable preference when allocating houses. This section explains what these groups are.

Note: The word “allocation” is itself jargon and includes house letting. The words “allocation” and “house letting” are both used in this policy.

When selecting tenants, we must give reasonable preference to three main groups as follows:

- homeless people and those threatened with homelessness with unmet needs (see note);
- people living in unsatisfactory housing conditions with unmet needs; and
- Scottish secure tenants who wish to move to other housing because their existing home is under-occupied.

Note: The legal term “unmet housing needs” means housing applicants whose needs cannot be met through other housing options.

3.5 What the law says: Factors we need not take into account when allocating houses

When allocating houses, we **don't** take any of the following issues into account:

- the amount of time that housing applicants have lived in our area;
- housing debt if this is/was not owed by a housing applicant,
- *for example: rent arrears owed by the housing applicant's husband or wife who was the previously named tenant;*
- non-housing debt, *for example, council tax;*
- the housing applicant's age except for housing that has been designed or specifically adapted for people of a certain age (or people who are to receive housing support services); and
- the housing applicant's income, including income of any other household member.

3.6 What the law says: Rent arrears

We cannot refuse an offer of housing in light of rent arrears if the arrears are **less than one month's rent value / cost**.

If rent arrears are more than one month's rent, WGHC are not required to make offers until the following arrangement is in place.

- an arrangement to repay the rent arrears is agreed;
- this arrangement is maintained for at least **three** months; and
- payments are continuing.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

3.7 What the law says: Home ownership

We cannot take home ownership into account when selecting tenants if these conditions apply:

- the property is let but the owner cannot enter the property, for example, it is not safe because of structural repairs;
- it is probable that occupying the property will result in abuse from someone living there;
- it is probable that occupying the property will result in abuse from someone who previously lived with the applicant (whether in that property or elsewhere); and
- occupying the house could endanger the health of any occupants and the applicant cannot take any reasonable measures to prevent that danger.

Note: It is our policy to apply these conditions when they exist.

3.8 What the law says: Residency

The law prohibits taking any local residency factors of a housing applicant unless certain conditions apply. We have not listed the conditions as it is WGHC policy not to take residency into account.

3.9 What the law says: Other restrictions

Other factors that prohibit WGHC from taking into account are:

- that an application for housing is in force for a minimum period;
- that a housing applicant obtains a divorce or judicial separation order;
- that a housing applicant obtains a dissolution of a civil partnership, or a decree of separation of civil partners; and/or
- that applicants should no longer be living with someone else.

3.10 What the law says: Allocation information and publicity

We are required to make and publish an allocation policy. We will make our Allocations Policy available to the public (also published on our website). This is provided free of charge. We must describe how we prioritise our applicant groups. This is explained in Sections 4 and 5. If we alter our allocation policy, we must publish any alterations within six months of the changes.

3.11 What the law says: Entitlement to access information

Each housing applicant is entitled to access information or personal data that relates to them and their application. This will be free from any charges.

Note: An applicant may apply to access any of their personal information under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. We may refuse such requests only if permitted and/or required by law.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

3.12 What the law says: Suspending offers of housing

This section explains, in plain language, the legal rules that apply to suspending offers to applicants at the point of application. Our own policy on internal transfer applicant suspensions is explained in Section 5.

Summary of statutory grounds (for information)

In law, we may withhold offers of housing if an applicant, at the point of application:

- has acted in an antisocial manner;
- has been convicted of certain offences, for example, allowing the house to be used for immoral or illegal purposes such as dealing in unlawful drugs;
- has a court order granted against her/him ending their tenancy;
- has abandoned their home and the tenancy has been ended using abandonment procedures;
- a court order to repossess a property is in force due to the tenant's failure to maintain their house and common parts, as appropriate;
- has outstanding housing debts, for example, if rent arrears are more than one month but no suitable repayment arrangement is in place;
- has made a false statement, knowingly or recklessly, in an application to a housing list; and/or
- has refused one or more previous offers.

3.13 Regulatory standards

The Scottish Housing Regulator has published regulatory standards in the Scottish Social Housing Charter. These standards cover all housing services, including allocation of housing. These are summarised in [Appendix 5](#).

3.14 Summary

Section 3 has described, in plain language, the main elements of allocation law. As allocation law is the basis for this policy, it is important to understand this law as this regulates the policy rules that are now explained below.

4.0 Allocation: our system

Section 4 explains our allocation system by reference to:

- Our own internal transfer group system;
- our housing groups;
- common housing register (EdIndex) and choice-based lettings;
- our suspension policy; and
- other relevant policies.

Note: Specific procedural rules of importance relating to this allocation policy are explained in Section 5.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

4.1 Our internal transfer Group system

We operate a group system of allocations. Priority within each group is determined by the banding awarded (based on housing need or aspiration).

Generally, WGHC will allocate empty properties in the following manner:

- Best use
- Level of priority – taking into account any current medical priority and the impact of current housing on the health condition and how the health condition of the applicant will be improved as a result of the allocation of a property
- Date of priority
- Date of registration

These groups consist of housing applicants with a diverse range of housing needs, including the reasonable preference groups covered in law. Our policy also ensures that preferences of housing applicants are taken into account when making offers; and this approach helps to promote sustainable housing.

However, WGHC reserves the right to make management transfers or decisions in exceptional circumstances which do not follow the general rules of allocation. Such instances are detailed in Section 4.2 below.

4.2 Our housing groups

Our groups are as follows:

- Edinburgh Council referrals;
- other agency referrals (partnerships with other housing providers and non-housing agencies);
- other lets;
- internal transfers (existing tenants); and
- Management Transfer Moves / Exceptional Decisions

Each group is now described briefly below with particular emphasis on how this approach promotes our policy objectives:

4.2.1 Edinburgh Council referrals

This group consists of referrals from Edinburgh City Council and covers people who are homeless or threatened with homelessness. We must accept such referrals unless a relevant exemption applies. These are known in law as section 5 referrals (see the Housing (Scotland) Act 2001).

Note: While we subscribe to the Edindex housing register, it is currently Edinburgh City Council policy **not** to make Section 5 referrals.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

4.2.2 Other agency referrals (partnerships with other housing providers and non-housing agencies)

WGHC will consider referrals from other local authority departments or external agencies for applicants in housing need.

4.2.3 Other lets

WGHC will consider requests for housing from other sources. Examples of other lets might include:

- requests from qualifying occupiers living in a WGHC property,
- requests from applicants where exceptional circumstances apply which may include moving to care for family member.

In such cases there must be a significant need and a significant benefit must arise from the allocation. Such cases will be exceptional and will require the consent of the CEO. Allocations from the Other lets category will be subject to internal audit and review.

4.2.4 Internal transfers (existing tenants)

This group enables us to meet a diverse range of housing needs and aspirations for existing tenants of WGHC. For example, this includes tenants who might be living in unsatisfactory housing, with unmet housing needs and/or be in housing that is under-occupied. Finally, by promoting internal transfers, we are also making best use of our housing stock and releasing properties for letting to the other groups.

4.2.5 Management transfer moves (existing tenants) / Exceptional decisions

WGHC reserves the right to make management transfers or decisions in exceptional circumstances which do not follow the general rules of allocation. Such instances could include, but are not limited to:

- Succession – where a person is entitled to a succession of tenancy but wishes to move from their current property. We will consider the request and may identify an alternative property for them
- Serious antisocial behaviour, harassment or domestic abuse – we may prioritise any application where there is significant or imminent personal risk to the applicant or household member if they were to remain in the property
- When there is a serious medical need, WGHC may bypass other applicants who have been placed in a similar banding, irrespective and regardless of date of registration or banding being awarded.

4.3 Edindex common housing register and choice-based lettings

Housing applicants can apply for our housing through the 'Edindex' common housing register and must have a registered application to do so. Under choice based allocations, housing applicants are categorised as follows:

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

4.3.1 Starters are homes for people who are:

- Homeless
- Staying with a friend or relative
- Staying in a hostel
- Staying in supported accommodation
- Renting a house or flat from a private landlord

The waiting time for Starters is worked out from the date the application form is registered. This means a **Starter** registered for one year has 365 waiting days. They will get a further day for every day they are registered.

4.3.2 Movers are homes for people who are:

- A Council tenant
- A Housing Association or Housing Co-operative tenant
- A joint tenant with the Council, Housing Association or Housing Co-operative
- A tenant of tied accommodation that is provided by an employer
- An owner occupier of a home (you may have a mortgage)

The waiting time for **Movers** is worked out from the date moved into your current home. For example, if you have been in your current home for 10 years, you will have 3,650 waiting days. You will build up a further day for every day you stay in your current home.

Priority awards are assessed as follows:

4.3.3 Urgent Gold Priority

Applicants who are currently in hospital and cannot go back to the home they lived in before as it no longer meets their needs.

4.3.4 Gold Priority

Applicants whose current home no longer meets their mobility needs and it cannot be adapted. Gold priority is generally only given to people who have been assessed as requiring a ground floor home.

4.3.5 Silver Priority – Homelessness

Applicants who have been assessed by the Council as statutorily homeless.

4.3.6 Silver Priority – Overcrowding

Applicants who need to move due to the following circumstances:

- you need 2 or more extra bedrooms for the size of your household, or,
- You only have one bedroom and live with one or more children under the age of 16

Note: Each of the 'EdIndex' partner landlords operate their own allocation policy, therefore their bedroom sharing guidelines may be different from that published by WGHC.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Your household circumstances will be fully checked by a housing officer before any offer of housing is made.

4.3.7 Silver Priority – Under occupancy

Applicants who currently live in a Council or Housing Association home with 3 or more bedrooms, no longer need all of them and would like to downsize. Housing applicants can then bid for advertised properties based on other factors such as types of houses available and so on. This is important as some properties are available for letting only to specific applicants such as sheltered housing for people over a certain age.

4.4 How to Bid

Once registered, you will be sent your 'Edindex' reference number. When you log on using your Edindex reference number you will be able to see all available homes.

You can bid for up to 3 homes each week. You must bid by the closing date for your bid to count. You will be contacted by the landlord after the closing date if your bid has been successful. You should carry on bidding until you have been made an offer of housing. Bid online at www.keytochoice.co.uk or phone 0131 529 5080.

Homes are advertised weekly online from 3.30pm on a Friday until the next Friday at 3pm. We provide housing applicants wanting to seek housing through this route with comprehensive information on our website about the Edindex scheme.

4.5 Our suspension policy

Our suspension policy covers two main issues: suspension of offers to our tenants seeking a transfer and to housing applicants registered with Edindex.

4.5.1 Suspended Offers to transfer applicants

Only a senior staff member can decide if offers to an applicant can be suspended. Each case is assessed on merit and the applicant is notified of our decision, including the reason for the suspension in writing. An applicant has the right to appeal this decision.

If an applicant is suspended from receiving offers, she/he must be advised in writing that the suspension will be for a maximum period of six months.

After the suspension period has ended, the case will be reviewed. This may result in a further suspension period being applied. The applicant must be informed in writing the outcome of the review. We record all suspensions, including reasons, and report on this to our committee for monitoring and review purposes.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

4.5.2 Applicants and breaches of tenancy

There are five instances in which we may suspend an internal transfer applicant from receiving offers of housing:

1) rent arrears

An applicant may be suspended from receiving housing offers if they have rent arrears which amounts to more than one month's rent and have not had a repayment agreement in place for at least three months; or have failed to adhere to a repayment agreement which has been in place three months or longer. In making this decision, we may also take into account personal circumstances and the extent of the housing need of the applicant.

2) a history of antisocial behaviour

An applicant may be suspended from receiving housing offers if they have a history of anti-social behaviour. In deciding whether a suspension is appropriate, WGHC will take into account the following:

- the extent to which the behaviour is because of acts by people other than the tenant;
- the nature, frequency and length of the behaviour;
- the effect the behaviour is having on other people;
- any other action taken by the landlord to address the behaviour; and
- the extent to which the tenant has engaged to try and improve or resolve the behaviour.

3) not taken reasonable care of their house

An applicant may be suspended from receiving offers of housing if they have not:

- taken reasonable care of their existing house or common parts;
- or have caused damage to the house or common parts;
- or they have carried out alterations without consent;
- or they are otherwise in breach of their tenancy agreement.

4) applicants who have refused offers

If two reasonable offers of housing have been refused, we may suspend an applicant from receiving any further offers. We may do this until we have held an interview with them to review their preferences and housing options.

5) applicants who delay in responding

We will withdraw an offer of rehousing if an applicant fails to respond to an offer and WGHC considers the delay unreasonable. This includes applicants who are unable to provide supporting information as requested by WGHC at the pre-offer / verification stage within a reasonable timescale. In such cases, we will notify the applicant in writing that their offer of housing has been withdrawn and we will proceed to make an offer of housing to the next suitable applicant.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

4.5.3 Suspension of Edindex applicants

This suspension process is managed by Edindex. Requests to suspend an applicant will be sent to the Edindex/Choice Panel Co-ordinator. The decision to suspend an applicant from receiving offers will be made by an officer panel in accordance with Edindex policy framework to support the decision making process. Edindex will take responsibility for advising the applicant and monitoring the case.

4.6 [Withdrawing, bypassing or not proceeding with the application process](#)

WGHC may take the decision to bypass or not proceed with an applicant or withdraw an offer of housing at any point from receipt of application and prior to a tenancy agreement being signed.

In the case of false information given in an application, this can also be grounds for WGHC seeking to end a tenancy should it come to light at a later date. Other than in the case of refusal of membership, WGHC may refuse to allocate if any of these grounds apply but will consider each case on its merits:

- if we are satisfied that the applicant has knowingly given false information or knowingly withheld relevant information.
- if we are satisfied that the applicant or a member of their household or someone acting for them:
 - has verbally or physically abused or intimidated staff or committee members;
 - has bribed or attempted to bribe or otherwise sought to obtain favour from staff or committee members;
 - has a history of antisocial behaviour which we are satisfied is likely to recur and cause nuisance to our tenants or within our area of operations.
- if the applicant has rent arrears from a current or previous tenancy of more than one month and has not made or is not abiding by an agreement to clear the debt.
- if we are satisfied that the applicant has been in breach of the tenancy agreement in relation to a current or previous tenancy on the grounds of antisocial behaviour and has received a written warning, a Notice of Proceedings for Recovery of Possession, an eviction order or an Anti-social behaviour order.
- if a WGHC internal transfer applicant fails to bring the tenancy to a lettable standard at the conclusion of the tenancy. Alternatively WGHC may decide to recharge the tenant for any expense incurred by WGHC in bringing that property up to a lettable standard.
- if we are satisfied that the applicant has unreasonably refused an offer of housing.
- if an application for membership of the Co-operative has been refused.
- Where the applicant owns a property unless:
 - It is unsafe for them to occupy the property (i.e. a threat of abuse or it is structurally unsafe) OR it does not meet their needs (i.e. if they have a disability and can't access facilities)
- if we are satisfied that it is reasonable to do so on some other grounds.

The decision and the grounds to refuse, withdraw an offer, bypass or no longer proceed with an application will be agreed between the Housing Officer or Manager and the Chief Executive Officer (CEO). The CEO will sign off this decision.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

The applicant will be informed in writing of the decision by the Housing Manager and invited to submit an appeal as a matter of course. The applicant may appeal if they disagree with the decision. In the case of rent arrears or breach of tenancy agreement, if the issues are resolved a future application may be considered. WGHC will keep a list of all those applicants who have been refused housing and the reason(s) for any refusal.

4.7 Other relevant policies

Other housing law is relevant to allocation policy such as mutual exchanges and the rights of Scottish secure tenancies. The latter are also referenced in our tenancy management policy.

Scottish secure tenants have a right to apply to exchange their homes with other Scottish secure tenants. We must make a decision within one month and provide reasons if we refuse such applications. We will generally refuse all mutual exchange applications in the first instance then invite applicants to provide further information to us through, or by the means of, an assessment with a staff member. Only once the application for a mutual exchange has been confirmed to proceed will we invite the applicant to apply for WGHC membership.

All applicants must either already be a WGHC member or have applied and been approved for membership with WGHC prior to any approval for the exchange being given. In the event of a refusal, tenants can apply to the sheriff court. The sheriff will decide if our decision was reasonable. If membership is refused the applicant may appeal to the Committee of Management in the first instance and if unsuccessful may raise an action in any court with competent jurisdiction.

4.8 Summary

Our allocation system is based on groups that reflect a wide range of housing needs. These needs include coverage of the reasonable preference groups covered in law, as well as preference-based needs.

The allocation system promotes our policy objectives in various ways such as meeting law, addressing social inclusion and making best use of our housing stock. Section 5 now explains key aspects of our allocation procedures.

5.0 Allocation procedures and Rules

Section 5 explains some key elements that are central to allocation practice. These are as follows:

- housing need;
- admission to our internal transfer list;
- prioritisation of transfer applications;
- other groups;
- verification of application details (pre-offer stage);
- allocation stage; and
- other specific rules.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

5.1 Housing need

Housing need is a complex term that can be understood by reference to various standards.

For example, housing law specifies various forms of housing need by defining these in law. This applies to homelessness, threatened with homelessness, overcrowding and housing that is below the tolerable standard.

Housing need covers social and environmental standards, too, and an applicant can be in need due to social exclusion and isolation even if their home is in good condition. This type of housing need is often reflected in the aspirations or preferences of housing applicants. In assessing applications onto our internal transfer list, therefore, we use a variety of housing needs to ensure comprehensive assessment.

5.2 Admission to our internal transfer list

All transfer applications from tenants aged sixteen or over will be accepted on to our waiting list after they have completed a transfer application form. On receipt of applications we place applicants directly onto our waiting list. Applications are then assessed as soon as possible thereafter and awarded a banding dependent on the level of housing need or aspiration. Before making offers, however, we check application details and gather supporting evidence, as appropriate (see below).

Once we have assessed your housing need, we will provide you with the following information:

- Registration date added to our list
- Registration number
- 'Banding' and reason
- Invite you to contact us if you would like housing options advice

We allow applicants to state their preferences regarding property type or street. This ensures that we can reduce the number of refused offers thus promoting our policy objective in this respect.

Where applicants state their preference and an empty property becomes available in an area or street they do not wish to be re-housed, we will bypass their application regardless of their priority or date of registration.

We can provide applicants with housing options advice upon request or if needed. We will carry out an annual review with all internal applicants providing them with the opportunity to update us of any such preferences.

We prioritise applications using our Internal Transfer Priority Banding System. This is explained in section 5.3 that follows.

5.3 Prioritisation of transfer applications

We prioritise transfer applications into four bands or groups, namely Band A, B, C and D. This section explains when an application is placed into one of the four Bands.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Band A:

- Where evidence from Police Scotland or Social Work supports a very urgent move
- **Medical Priority A** – Where the applicant or household member has an emergency need to move and has a serious health condition which is seriously adversely affected by current housing
- Where a tenant needs to be discharged from hospital but cannot return to their current home because it is unsuitable for their needs.
- Where a tenant requires an adapted property to meet their needs and their current home cannot be adapted.
- Where the tenant lacks two or more bedrooms.
- Where the tenant under-occupies by two or more bedrooms.

Band B:

- **Medical Priority B** – Where the applicant or household member has an urgent need to move and current housing are having a major adverse effect on the medical condition
- Where the tenant is releasing an adapted property in high demand.
- Where the tenant lacks one bedroom.
- Where the tenant under-occupies by one bedroom.

Band C:

- **Medical Priority C** – Where the applicant or household member has a need to move because the current housing are having an adverse effect on the medical condition
- Where the tenant has a child who is eleven years or under and lives in a flat above the ground floor level.

Band D:

- Where the tenant has no identifiable housing need and is in a suitable property for their needs but aspires to live in a different part of the estate or a different property type
- **No Medical Priority** – Where the medical condition will not be improved by moving or where WGHC cannot provide the type of housing that may improve the health condition.

Notes

An applicant must notify us of any changes in their housing need. They will have their application re-assessed and placed into an appropriate Band (*which could go up or down*).

Where an applicant/tenant's priority covers more than one of the bullet points in each banding, the Housing Officer / Manager assessing the application must decide which **ONE** criteria is being applied and award on that ground.

Medical Priority – Medical Priority is not awarded because the applicant has a health condition. Priority will only be considered when there is a clear, adverse and demonstrable link between the current housing and the health of applicant or household member. In many cases, re-housing may not alleviate the medical condition. It is the effect that a type of property may have on the applicant, not the severity of the medical condition that WGHC will take into consideration. Relatively mild, intermittent or temporary conditions are unlikely to receive any priority.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

If a transfer applicant's home is not accessible to meet their needs, that is, their home is unsatisfactory, then we may seek appropriate evidence.

5.4 Other groups

We make offers based on a banding system that ensures that all groups are considered for lets. This promotes sustainable communities and ensures that we address a diverse range of housing needs.

5.5 Verification of application details (pre-offer stage)

The following applies to both internal and Edindex applicants.

Before making offers of housing to housing applicants, we need to verify application details, as appropriate. This is an important part of the pre-offer stage as it allows WGHC to re-assess applications to establish if there has been a change in medical condition(s) or other circumstances affecting the housing needs of the applicant.

If we are unable to make successful contact with the applicant at this stage or they fail to attend an assessment interview or provided information / evidence to us within a reasonable timescale, we will bypass their application and move on to the next applicant on the shortlist.

If appropriate, we will carry out a home visit to verify details and confirm interest. If a home visit is not practical then the applicant will be invited to attend an interview at our office or a telephone interview may be carried out. When visiting housing applicants at home, we ensure that we visit them at an agreed time respecting their rights to privacy.

We may also contact external agencies or relevant persons to confirm or request information concerning the applicant and their household relating to breach of tenancy, health issues, support needs and so on. We contact other agencies/persons only if this complies with data protection law and guidance relating to sharing of personal information. For example, applicants provide written consent to make such enquiries when they sign the declaration on their housing application form.

Notes

If application details are different from previously provided, then applications will be re-assessed to determine current housing priority. WGHC will inform the applicant of any changes. This could result in applications being re-banded (*which could go up or down*) or bypassed to allocate an empty property to an applicant with a more immediate or urgent housing need, irrespective and regardless of date of registration.

Information that we gather through references is aligned to our allocation policy. For example, we do not seek opinions about applicants but only information that might be relevant to an offer being made. We will generally not seek tenancy references for any period in excess of 3 years.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

5.6 Allocation stage

At allocation stage, specific factors influence whether or not an offer can be made. These include the size of house and the type of house.

5.7 Other specific rules applied to both Internal and Edindex Applicants

- accessible housing;
- access and fostering;
- antisocial behaviour order;
- rehousing registered sex offenders;
- date of application;
- occupancy standard;
- pets;
- quality control through audits;
- refusal of offers; and
- reviews and cancellations.

5.7.1. Accessible housing

We have accessible housing suitable for wheelchair users. We have several properties designed as amenity housing. As such, these properties are allocated only to housing applicants:

- who have an assessed need for this type of accommodation
- who are sixty years and over

5.7.2. Access and fostering

Where a parent has joint custody or regular access to a child/children 2 nights per week or more, the child/children will be classed as permanent members of the household. However, no overcrowding priority will be awarded.

For benefit purposes, the legislative position is different, therefore applicants will be asked to make an informed decision on whether they accept an offer of a property which is larger than their “needs” as defined by legislation.

Applicants who foster children or wish to be considered for housing large enough to enable them to foster children, must provide evidence from the relevant government agency confirming the arrangements.

5.7.3. Antisocial Behaviour Order (ASBO)

If an ASBO is in force, we consider the terms of any such order before making any offer of housing.

5.7.4 Priority and date of application - EdIndex

There may be times when two applicants at the top of the EdIndex shortlist have the same number of points. In such cases, priority is determined by date of application.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

5.7.5 Priority and date of application – WGHC internal transfer

Where banding is used (*not points*), WGHC may consider other factors and not simply determine priority by date of application. These factors are:

- best use of stock
- medical priority
- level of adverse effect the current property is having on the applicant and which would benefit most by moving, over other applicant's with the same 'banding' irrespective and regardless of date of registration

In order to help us determine the above, WGHC may ask the applicant to provide supporting evidence / documentation at any stage.

5.7.6. Rehousing registered sex offenders

Multi-Agency Public Protection Arrangements (MAPPA) were introduced as a result of the Management of Offenders etc (Scotland) Act 2005. Applications covered by MAPPA arrangements are discussed by staff at a senior level and in consultation with relevant agencies such as the Council's Sex and Violent Offender Liaison Officer, Police Scotland and Social Work Services. Given WGHC's stock is situated adjacent to or in the immediate vicinity of a number of children's playpark facilities (all owned by WGHC) it is unlikely WGHC would be able to proceed with offers of re-housing to offenders in such cases. Any offers will be dealt in line with MAPPA (Multi Agency Public Protection Arrangements) Protocols which cover the Edinburgh area.

5.7.7 Occupancy standard

Detailed below are the number of bedrooms for which various household types qualify.

Examples of persons considered to need a separate bedroom are:

- two adults who are partners (that is, a couple of the same or opposite sex) will be allocated a double bedroom;
- a single adult (16 years or over);
- permanent carers (support workers);
- foster children;
- a disabled person who needs overnight support.

Notes

A separate bedroom will also be required if there is an assessed medical reason for a couple not to share the same room. This would also apply if a separate room were required for medical equipment. Table 1 shows our occupancy standard with notes on child and age mix.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Table of Household Code and Property Sizes

Household Type	Number of bedrooms				
1 adult	1				
1 adult	1 or 2	eg. WPT House due to size of 2nd bedroom			
2 adults	1 or 2				
3 adults	2 or 3				
4 adults	3 or 4				
5 adults	4 or 5				
1 adult or couple + 1 child	2				
1 adult or couple + 2 children	2 or 3				
1 adult or couple + 3 children	3 or 4				
1 adult or couple + 4 children	4				
1 adult or couple + 5+ children	5				
2 adults + 1 child	3				
2 adults + 2 children	3 or 4				
2 adults + 3 children	3 or 4				
2 adults + 4 children	5				
1 couple + 1 adult	2				
1 couple + 1 adult + 1 child	3				
1 couple + 1 adult + 2 children	3 or 4				
1 couple + 1 adult + 3 children	4				
1 couple + 1 adult + 4 children	5				
1 couple + 2 adults	3				
1 couple + 2 adults + 1 child	4				
1 couple + 2 adults + 2 children	4 or 5				
1 couple + 2 adults + 3 children	5				
1 couple + 3 adults	4				
1 couple + 3 adults + 1 child	5				
Children under 16 same gender	Share 1	double bedroom			
Children under 10 either gender	Share 1	double bedroom			
Children different gender					
1 over 10 and 1 under 10	Single	bedroom each			
Children same gender					
1 over 10 and 1 under 10	Single	bedroom each			

Note:

The number of Bedrooms depends on the individual circumstances of the applicants and must fall within the guidelines outlined in the Allocations Policy and Lettings Plan.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

5.7.8 Under occupation

Applicants may wish to be considered for a property that results in under-occupation according to the housing benefit size criteria rules and this lettings plan.

For example, a couple with two children of different sexes under ten may wish to apply for a three bedroom property.

We consider making allocations which may result in allocating properties to households who are deemed to be under occupying This would be due to the property sizes in Granton Mill and child density concentrations in flatted developments.

In such cases applicants will be advised at the assessment stage how under occupation of the home may affect their Housing Benefit/Universal Credit entitlement.

A household consisting of a single person or couple may be considered for a two bedroom property if they can satisfy WGHC they have a reasonable need for a second bedroom. In such cases we would normally only allocate a flat and not a house. The exception to this would be the houses in West Pilton Terrace where the second bedroom is considerably smaller in size in comparison to the rest our two bedroom houses.

5.7.9 Taking future household needs into account

This may mean offering larger properties to give households the capacity to remain in the property and as part of the local community as their children would get older. This would apply where the age/gender of children in the household mean that they would be eligible for a larger property within the next 12 months. If an applicant is pregnant WGHC will not recognise the need for an additional bedspace or bedroom until the child is born.

5.7.10 Downsizing and number of bedrooms

In order to assist internal transfer applicants with downsizing we may choose to allocate them a property which would exceed their bedroom requirements but still be smaller in size than their current tenancy.

5.7.11 Pets

All tenants must ask permission to keep a dog as well as other pets. In relation to properties with enclosed gardens, permission is not usually unreasonably withheld.

Within the West Pilton Bank and Forth Quarter Development, though, dogs are strictly prohibited, except for qualified assistance dogs required by disabled people. Within all other flatted developments, dogs are not allowed with the exception of ground floor flats with an enclosed garden or for a fully qualified assistance dog.

5.7.12 Quality control through audits

All decisions made in relation to an application will be recorded in writing and where appropriate confirmed in writing to the applicant. Committee will receive regular updates on allocations and will review and revise this policy on a regular basis.

Using the Edindex Choice Allocations System, WGHC Staff will print off each shortlist from Edindex which will include the reasons for bypassing any applicant(s). A list of the restriction(s)

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

criteria applied to each shortlist will be generated by WGHC Staff and attached to the shortlist along with a copy of the advert for each vacancy.

Where possible, Staff will print off all available audit trails for each allocation from the Edindex System. Audit trails from Edindex are to be used to complement the allocation audit trails generated internally by WGHC Staff for each allocation.

Periodically a Senior Staff Member will review a random sample of allocation decisions and associated paperwork to ensure that the required standards are being followed. Shortlists, unsuccessful applications and audit trails will be held on file for two years and disposed of thereafter as confidential waste.

5.7.13 Refusal of offers

Until an applicant has signed a Scottish Secure Tenancy Agreement with us, they have the right to refuse an offer of housing. We keep a record of all offers refused and the reason(s) for the refusal. If an applicant has failed to respond to an offer letter within the time scales notified, then we treat this as a refusal and withdraw the offer.

Note: We also delete this information in line with our data retention schedule.

5.7.14 Reviews and cancellations

Edindex Register

Edindex review their register of applications on a regular basis in accordance with the City of Edinburgh Lettings Policy.

WGHC Internal Transfer List

To help us monitor housing need and demand within our own stock accurately, we review our own internal transfer housing list once a year. This process involves sending out letters to all applicants. We ask applicants to notify us of any changes and to confirm if they wish to remain on the list. We use freepost envelopes to encourage responses. Failure to respond to the initial review letter will result in a second reminder letter being sent. If the applicant fails to respond to this second letter we will cancel their application and remove their details from our list.

We only cancel applications in the following circumstances:

- If an applicant asks for their application to be cancelled;
- on the death of an applicant; or
- if the applicant fails to respond to a review of the list.

5.7.15 Summary

We implement our allocation policy through our internal staff procedures. These procedures are comprehensive in nature and promote consistency and coherence throughout our allocation services.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

6.0 Staff training

Training is vital if we are to implement our allocation policy objectives effectively. Our training programme includes:

- allocation training for housing staff;
- policy and monitoring training for committee members; and
- information and briefing events for tenants, housing applicants, as appropriate

7.0 Allocations and social justice

We promote equality and diversity throughout our allocation policy and related procedures. This is often referred to as mainstreaming of equality into practice. This is explained below by reference to our activities.

7.1 General practices to promote social justice

- providing accurate and clear information to housing applicants about our allocation policy;
- Promoting the use of interpreters and/or providing assistance for those that may need it, as appropriate;
- monitoring allocation services to ensure that our services prevent any form of discrimination, as well as promoting awareness of equal opportunity matters;
- promoting access of this common allocation policy to people with the protected characteristics;
- using our allocation policy to consider referrals from external agencies, including equality agencies; and
- working in partnership with the City of Edinburgh Council to address homelessness and to promote social inclusion

7.2 Specific practices to promote social justice

Our equality policy aims to address equality issues in our community. Thus, we address the issue of social exclusion due to relative poverty of many of our tenants (and prospective tenants). We do this through our anti-poverty activities. This involves housing staff working with tenants – and supported by specialist agencies – to maximise access to entitled benefits.

7.3 Summary

We include equality and diversity matters throughout our allocation services. This is done through mainstreaming of equality issues into all aspects of the allocation service.

8.0 Performance management

We ensure that comprehensive monitoring systems are in place to enable allocation practices to be audited. This is very important to demonstrate compliance with law and regulatory standards. Monitoring the implementation of this policy is central to quality assurance, in particular to assess if we are meeting our stated policy objectives.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Finally, monitoring is key to ensuring that allocation practices are subject to continuous improvement. We gather information as part of the ARC (Annual report on the Scottish Social Housing Charter) and general information. This is a requirement specified by the Scottish Housing Regulator.

Examples of what we monitor are:

- Quantitative:
 - How many lets do we make each year to applicants who are statutorily homeless?
 - How long does it take us to relet an empty house?
- Qualitative:
 - How satisfied are tenants with the condition of your new home?
 - How satisfied are tenants with the quality of information given to them at their sign up?
 - How satisfied are tenants with the explanation given to them about their tenancy agreement at their sign up?

8.2. Summary

Monitoring performance is essential to promote effective organisational governance. By monitoring allocation practices, we also assess how well we are meeting allocation law and regulatory standards. Finally, we use allocation data to improve our services

9.0 Appeals or complaints

WGHC will not delay the allocation of the vacant property pending any appeal. If an appeal is successful the applicant will be considered for the next available suitable property.

Appeals

Customers may appeal against decisions taken in relation to allocations. Appeal procedures are set out in the [WGHC Governance Policy](#).

Decisions which may be appealed would include:

- refusal to allocate a property;
- refusal of request for mutual exchange;
- refusal to be considered for a particular size of property;
- refusal to be considered for a particular property type;
- refusal of a request to assign or transfer a tenancy;
- Any other decision relating to allocations which affects an applicant.

9.1 Complaints

A complaint is quite distinct from an appeal against a decision. WGHC define a complaint as “An expression of dissatisfaction by one or more members of the public about West Granton Housing Co-operative's action or lack of action, or about the standard of service provided by or on behalf of West Granton Housing Co-operative.”

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

In the context of allocations, a complaint would have to be about the way we applied our allocations policy or administered the process, rather than about the decision itself. Complaints are processed in accordance with [WGHC's Complaints Handling Policy](#).

10.0 Consultation and review of policy

We consult with tenants, applicants for housing and other groups as explained in Section 3. Consultation is part of our tenant participation strategy and we use a wide range of consultation methods to reflect the needs of people in our community. These methods also take into account of accessibility requirements of disabled people.

10.1 Review of allocation policy

We review our allocation policy every four years or sooner, as appropriate. For instance, we may review our allocation policy because of changes to law, or monitoring / reporting reveals that a change is required sooner.

10.2 Summary

We consult with tenants and other people when developing our allocation policy in line with allocation law. We review allocation policy, as required, and plan reviews in a structured and comprehensive manner to ensure full and proper consultation.

11.0 Appendices

[Appendix 1](#): The common housing register and our partner housing associations.

[Appendix 2](#): Law and guidance framework

[Appendix 3](#): Other relevant information

[Appendix 4](#): Lettings restrictions criteria

[Appendix 5](#): The Scottish Social Housing Charter

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.1 Appendix 1:

The common housing register and our partner housing associations / co-operatives

[Ark Housing Association Ltd](#)

The Priory, Canaan Lane,
Edinburgh, EH10 4SG
Tel : 0131 447 9027



[Barony Housing Association](#)

Canal Court, 40 Craiglockhart Avenue,
Edinburgh, EH14 1LT
Tel : 0845 140 7777



[Cairn Housing Association](#)

Murdostoun House, 5 Linnet Way
Strathclyde Business Park, Bellshill, ML4 3RA
Free from landlines : 0800 990 3405
Local rate from mobiles: 0300 456 1245



[Blackwood Homes](#)

160 Dundee Street
Edinburgh, EH11 1DQ
Tel : 0131 317 7227



[Castle Rock Edinvar Housing Association](#)

1 Hay Avenue,
Edinburgh, EH16 4RB
Tel : 0131 657 0679



[Dunedin Canmore Housing](#)

8 New Mart Road
Edinburgh, EH14 1RL
Tel : 0131 478 8888



[Hillcrest Homes](#)

126 Canongate
Edinburgh, EH8 8DD
Tel : 0300 123 2640



Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Home Scotland Ltd

20 Harvest Road
Newbridge
Edinburgh
Tel : 0131 335 6810



Link Housing Association Ltd

Watling House
Callendar Business Park
Falkirk, FK1 1XR
Tel : 03451 400 100



Lister Housing Co-operative Ltd

36 Lauriston Place
Edinburgh, EH3 9EZ
Tel : 0131 229 6176



Manor Estates Housing Association

11 Washington Lane
Edinburgh, EH11 2HA
Tel : 0131 337 3222



Port of Leith Housing Association Ltd

108 Constitution Street
Edinburgh, EH6 6AZ
Tel : 0131 554 0403



Prospect Community Housing

6 Westburn Avenue
Wester Hailes
Edinburgh, EH14 2TH
Tel : 0131 458 5480



Trust Housing Association Ltd

12 New Mart Road
Edinburgh, EH14 1RL
Tel : 0131 444 1200



Viewpoint

4 South Oswald Road
Edinburgh, EH9 2HG
Tel : 0131 668 4247



Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

West Granton Housing Co-Operative Ltd

26 Granton Mill Crescent
Edinburgh, EH4 4UT
Tel : 0131 551 5035

The City of Edinburgh Council, Locality Offices

North East Locality

101 Niddrie Mains Road
Edinburgh, EH16 4DS
Tel : 0131 529 3111

28-30 Ferry Road
Edinburgh, EH6 4AE
Tel : 0131 529 5524

North West Locality

8 West Pilton Gardens
Edinburgh, EH4 4DP
Tel : 0131 529 5050

The Drumbrae Library Hub
81 Drum Brae Drive
Edinburgh, EH4 7FE
Tel : 0131 529 7440

South East Locality

40 Captain's Road
Edinburgh, EH17 8HN
Tel : 0131 529 5158

249 High Street
Edinburgh, EH11 1YJ
Tel : 0131 529 7061

South West Locality

10 Westside Plaza
Edinburgh, EH14 2ET
Tel : 0131 527 3800

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Other landlords - The following 2 landlords let their homes in a different way. If you come to the top of their list for a home, they will contact you directly.

[Hanover \(Scotland\) Housing Association Ltd](#)

**95 McDonald Road
Edinburgh, EH7 4NS
Tel : 0131 557 7404**



[Muirhouse Housing Association](#)

**11 Muirhouse Medway
Edinburgh, EH4 4RW
Tel : 0131 336 5282**



Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.2 Appendix 2: Legal and guidance framework

This Appendix summarises key legal and guidance sources relating to allocations. It also provides a summary of the tolerable standard and the overcrowding standard.

The following law section is intended to refer to law that indirectly impacts on allocations as opposed to allocation law itself. The Housing (Scotland) Act 1987 (as amended) covers all the allocation legal changes since 1987, including the 2001, 2010 and 2014 Acts.

- **Legal sources**

Allocation law is contained in the Housing (Scotland) Act 1987, as amended.

- **Allocation guidance**

Scottish Government, 2019, Social Housing Allocations in Scotland: A practice guide, Scottish Government.

Other relevant law

Key laws that impact on developing allocation policy are (in alphabetical order):

- Data Protection Act 2018;
- Equality Act 2010;
- General Data Protection Regulation 2016;
- Housing (Scotland) Act 2014;
- Housing (Scotland) Act 2010;
- Housing (Scotland) Act 2001;
- Human Rights Act 1998.

Note: There are many other laws and secondary legislation that impact on allocation practice. Further information is available by contacting housing staff.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.3 Appendix 3: Other relevant information

Appendix 3 contains other relevant information for housing applicants. This covers the following topics:

- our housing stock profile;
- our lettings plan; and
- lettings restrictions criteria.

11.3.1 Our housing stock profile

AREA	No. of bedrooms	Notes	Family houses	amenity bungalows	wheelchair bungalows	Gen Need Flats	Amenity flats	wheelchair flats
Miller 143	1					8		
	1					2		
Granton Mains	1	103 two storey terraced or semi detached houses; 20 terraced one storey bungalows; 20 one bedroom four-in-a-block flats. Completed 1993-96.		13			10	
	2			7				
	2		2					
	2		46					
	3		51					
	4		3					
Granton Mill Crescent & Drive	4		1					
	1					8		
	1					2		
	1	59 two storey terraced, semi detached or detached houses. 20 terraced or semi detached bungalows. 10 flats in two three storey blocks. (Ground floor of one block is WGHC office.) Completed 2000-2002.		1				
	2			13				
	2			12				
	2				3			
	2			23				
3				2				
3			4					
3			21					
4		8						
5		3						
West Pilton Drive	2	Flats in mixed tenure blocks. Built 1935, bought & renovated 2002-05. To be sold when void.				1		
Craigmuir & Ferry Road Avenue	2	34 two and "2½" storey terraced or semi detached houses. 38 two bedroom flats in two or three storey blocks. Completed 2006-				24		
	2				14			
	3			22				
	4			12				
West Pilton Bank	1	11 flats in one four storey block. Completed 2008.				3		
	2				1			
	2				6			
	2						1	
Forthquarter	1				4			
Colonsay Close Waterfront Park	1	45 flats in three blocks. 2 x five storey; 1 x six storey. Completed 2009.				12		
	1					1		
	1					4		
	1							1
	2					3		
	2					15		
	2							2
3					3			
			196	48	3	106	15	4
								372

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.3.2 our lettings plan;

Introduction

This lettings plan indicates how we intend to allocate empty properties after dispensation of any legal obligations, within a consistent, fair and non-discriminatory framework. It complements the WGHC Allocations Policy and will be used as a tool to help build and sustain the balance of existing communities.

Lettings Criteria

This Lettings Plan has been developed to ensure that a wide range of applicants can be considered for our properties. In order to create and maintain a stable community WGHC may not always allocate its properties to maximum occupancy.

In addition, to create well managed and well maintained communities and to assist with tenancy sustainment for individual households we will also refer to the criteria detailed our Lettings Restrictions Criteria.

The decision on which designations and criteria are to be used for an individual vacancy will be made by the Housing Officer responsible for the allocation, or Housing Manager at the point a property is to become void. The decision will take into account the property type, its situation within the estate and surrounding stock types, and any other relevant housing management factors including making best use of WGHC stock and the list of factors identified in section 4.1

Sensitive Lets

Sensitive Lets are for cases where it is necessary for us to exercise discretion in tenant selection and there is a departure from our standard allocation rules, such as selecting an applicant from the top of a shortlist.

The aim of sensitive letting is to secure the social wellbeing of the applicant and the cohesiveness of the local community and neighbourhood. Sensitive letting will involve applying discretion when making the decision whether or not to offer the applicant the vacant property, in a way which is both justifiable and accountable.

Allocation decisions should aim to provide a stabilising influence in the street, block or cul-de-sac concerned. For this reason we may sometimes bypass an applicant at the top of the list.

For example, an applicant at the top of the list aged significantly younger than the remaining tenants in a 4-in-a-block development may have differences in their lifestyle and might therefore not provide a stabilising influence in that block. Additionally, we may use sensitive lets to avoid an over concentration of vulnerable or inexperienced households.

Applicants with no recourse to public funds

WGHC may let a property to an applicant who has no recourse to public funds. An assessment will be undertaken to ascertain the households ability to meet their rental liabilities and ensuring a tenancy will be sustainable is the dominant consideration. WGHC will comply with all current legislation in regard to an applicant's status.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Household Composition

In all cases the onus will be on the applicant to establish clearly and with evidence who the permanent members of the household are or will be and that they will all be moving into the proposed tenancy.

WGHC may request supporting evidence and/or other documentation from various local or national government agencies confirming the permanent address or residency of a household member.

Child Densities in Flatted Developments

WGHC owns 117 flats. These properties vary in size and numbers within particular stairs and developments. We will allow households with children to be considered for flatted properties, however, we will generally allocate ground floor, main door flats to applicants who have mobility difficulties.

Each time an empty property becomes available for relet within a flatted development we will look at the existing number of households with children living in the stair.

To avoid an over concentration of children in a particular stair or to avoid potential lifestyle clashes, the Housing Officer / Manager will exercise discretion over whether the empty property is to be allocated to a household with or without children after discussion and counter signatory with the CEO.

Adopting such a flexible lettings approach to these property types will help us to sustain and promote local communities within our flatted developments.

Determining the number of bedrooms required by a household

Detailed below are the number of bedrooms for which various household types will qualify.

Persons considered to need a separate bedroom:

- Two adults who are partners (i.e. a couple) will be allocated a double bedroom;
- A young person who has reached the age of 16 years (i.e. an adult);
- Where there is an assessed medical reason for a couple not to share the same room;
- Where an additional room is required for medical equipment;
- Permanent carers and foster children who are part of a household;
- Tenant with disabilities who needs a non-resident overnight carer (support worker or family member).

Child age mix - A child is someone under 16.

- Children under 16 years of same gender are generally expected to share one double bedroom
- Children under 10 years regardless of gender are generally expected to share one double bedroom.
- A family with two children of different sex with one under 10 and one over 10 will be eligible for a single bedroom for each of the children.
- A family with two children of the same sex with one under 10 and one over 10 can be considered for a property with a single bedroom for each of the children.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

Aspirations

If there are no suitable internal transfer applicants defined as being in housing need on our list, then offers of accommodation may be made to those who have an aspiration to move to a similar size property or a different property type within our estates, including another flat in the same development or another house in the same street.

Best use of amenity and wheelchair properties

We have accessible housing suitable for wheelchair users. We have several properties designed as amenity housing. As such, these properties are allocated only to housing applicants:

- who have an assessed need for this type of accommodation
- who are sixty years and over

In order to achieve this we may use mobility, wheelchair use or age restrictions in shortlisting or we may allocate to a household which might not achieve maximum occupancy of the property. We may bypass applications with the same level of priority or banding irrespective and regardless of date of application when determining property.

If a wheelchair adapted property becomes available to relet and we have no suitable applicants in need of such accommodation we may approach the local authority to ask for suitable nominations or choose to allocate this property type to a household with an assessed mobility need with no wheelchair use.

Dogs

All tenants must ask permission to keep a dog as well as other pets. In relation to properties with enclosed gardens, permission is not usually unreasonably withheld.

Within the West Pilton Bank and Forth Quarter Development, though, dogs are strictly prohibited, except for qualified assistance dogs required by disabled people.

Within all other flatted developments, dogs are not allowed with the exception of ground floor flats with an enclosed garden or for a fully qualified assistance dog.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.4 APPENDIX 4: Lettings Restrictions Criteria

DESCRIPTION	LETTINGS & RESTRICTIONS CRITERIA
Wheelchair adapted houses and flats	<p>Preference will be given to households that require this type of accommodation. No age restrictions.</p> <p>Problems may be experienced finding suitable applicants for these types of properties therefore they may be advertised to both Starters and Movers with or without children (dependent on the property type). Edindex has asked all partner landlords to advertise these property types as suitable for both Starters and Movers.</p>
Amenity bungalows & ground floor flats	<p>We have accessible housing suitable for wheelchair users. We have several properties designed as amenity housing. As such, these properties are allocated only to housing applicants:</p> <p>who have an assessed need for this type of accommodation who are sixty years and over</p> <p>Edindex has asked all partner landlords to advertise these property types as suitable for both Starters and Movers with or without children (dependent on the property type).</p>
Upper flats	<p>Considered to be general needs housing. May be advertised to Starter or Mover or both. Tenancy Manager may exercise discretion whether property to be advertised as suitable for households with or without children (dependent on number of households with children already living in the stair).</p> <p>The Housing Manager will exercise discretion under Sensitive Lets when considering suitable applicants for the upper flats in these blocks.</p>
Granton Mill Crescent Starter Flats with white goods and blinds	<p>Usually, applicants who are homeless or first time households will be considered for these flats.</p>
General Needs Houses	<p>May be advertised to Starter or Mover or both. Where the property type is a house with 2 or more bedrooms and a private garden, WGHC will generally give preference to households with children.</p>

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years

11.5 APPENDIX 5: The Scottish Social Housing Charter

The Scottish Housing Regulator uses outcomes and standards set out in the Scottish Social Housing Charter (SSHC) to assess the performance of social landlords. To allow the CAP to meet the required outcomes and standards we have developed our policy to ensure:

- **Outcome 1:** Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and Housing Services.
- **Outcome 2:** Tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.
- **Outcome 7:** People looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them.
- **Outcome 8:** Tenants and people on housing lists can review their housing options.
- **Outcome 9:** People at risk of losing their homes get advice on preventing homelessness.
- **Outcome 10:** People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and their prospects of being housed.
- **Outcome 12:** Homeless people get prompt and easy access to help and advice; are provided with suitable, good-quality temporary or emergency accommodation when this is needed; and are offered continuing support to help them get and keep the home they are entitled to.

Document Name:	WGHC Allocation Policy	Version:	2.0
Created:	David Mills	Version Date:	13/04/21
Owner:	David Mills / WGHC	Review Due:	31/03/24
Location / Path:	WGHC \ M:	Retention	3 Years