



Allocation Policy

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HAPPY TO TRANSLATE



Creating thriving rural communities
www.berwickshirehousing.org.uk
Berwickshire Housing Association is a Registered Society. Registration No.: SP2482RS
Scottish Charity No.: SC042342 Registered Office: 55 Newtown Street, Duns, TD11 3AU

Allocation Policy

1. Introduction

- 1.1 Berwickshire Housing Association (referred to in this policy as “BHA”, “we” or “our”) is a Registered Social Landlord providing a range of affordable social housing throughout Berwickshire. BHA is the largest social housing provider within Berwickshire and aims to meet the housing need in the area creating thriving, sustainable and stable communities where people wish to reside. BHA offers a mix of housing tenure including general needs, amenity, sheltered, wheelchair, Mid Market Rents (MMR) and Shared Ownership Housing.
- 1.2 BHA has an active development programme which aims to meet the needs of people wishing to reside within the community and promote a desire to remain in Berwickshire.
- 1.3 Whilst developing this policy BHA have followed guidelines provided by the Scottish Government ‘Social Housing Allocations in Scotland: A Practice Guide’ February 2019.
- 1.4 This policy sets out the principles and guidance for BHA staff, tenants and persons seeking housing and ensures that our homes are let to those with assessed need, making best use of our available homes whilst providing choice to persons seeking housing.

2. Legislation

- 2.1 At a minimum we will comply with all relevant legislation including:
- The Housing (Scotland) Acts 1987, 2001 & 2014
 - The Homelessness etc. (Scotland) Act 2003 (amending previous Acts)
 - The Race Relations Act 1976
 - The Sex Discrimination Act 1975
 - The Disability Discrimination Act 1995
 - The Equality Act 2010
 - The Human Rights Act 1998
 - The Management of Offenders (Scotland) Act 2005
 - The Data Protection Act 2018
 - General Data Protection Regulations (GDPR) 2018 and
 - Reflects the Scottish Social Charter issued by the Scottish Housing Regulator in 2017

3. Aims & Objectives

3.1 BHA aims are to provide access to good quality, affordable homes for a diverse range of people who have a level of housing need. By providing such housing and wider support services we will contribute to our community ensuring we deliver on our commitment to create thriving rural communities. We also aim to achieve high levels of satisfaction for the delivery of the allocation service.

3.2 The objectives of the policy are:

- To make best use of our housing stock letting our homes giving reasonable preference to those in greatest housing need.
- Ensuring consistent use of policy when allocating homes ensuring we are fair and transparent.
- Provide choice as far as reasonably possible.
- To meet our legal obligations.
- To ensure access to our housing register is fair and open.
- Provide good quality housing options to all those seeking housing within the Scottish Borders.
- Support Scottish Borders Council (SBC) to meet the needs of those assessed as homeless and other vulnerable applicants via protocols and agreements.
- Develop and maintain sustainable communities
- Our targets reflect the aim to achieve balanced communities

4. Access & Eligibility

4.1 BHA welcomes anyone aged 16 and over from the UK to register for housing. UK legislation set out eligibility for persons from out with the UK; this can depend on various factors such as:

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

4.2 Any request to register from persons out with the UK will be assessed in accordance with current legislation and guidance.

4.3 The right to be admitted to the register differs from the right to be allocated property.

5. Management Move/Decision

5.1 BHA 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 their request and may identify an alternative property for them
- Serious antisocial behaviour, harassment or domestic abuse, we may prioritise any priority pass in terms of date
- Sensitive Lets, where there has been issues within the area such as serious antisocial behaviour OR there are vulnerable people living in the immediate vicinity of an available property we may consider a sensitive let.
- When there is a serious medical need

6. Protocols

6.1 BHA is committed to working in partnership with other agencies and Registered Social Landlords to address local housing issues and needs. Protocols are established and adhered to with formal working arrangements to ensure applicants with particular needs or vulnerabilities avoid housing crisis. Protocols include rehousing for care leavers, sex offenders, people experiencing homelessness, victims of domestic abuse and persons leaving prison. Such protocols are held centrally within the organisation.

7. Choice Based Lettings

7.1 We advertise our available properties each week using Homehunt. This is a choice based lettings system whereby our vacant properties are advertised and persons registered can apply for properties of their choice. We aim to deliver a simple system which captures all information required to make a decision on need. We will achieve this by consulting with tenants, persons registered and other stakeholders when developing our policy.

8. Discrimination & Equal Opportunities

8.1 It is illegal to discriminate against applicants on the grounds of race, sex or disability. Our registration form will ask applicants to provide details of their ethnic origin in order for us to report to the

Scottish Housing Regulator each year however this is entirely voluntary.

8.2 We will follow our Equal Opportunity Policy and not discriminate against applicants due to:

- the legal status of a relationship
- age
- sexual orientation or gender identity
- language
- social background
- beliefs or opinions, for example religious or political beliefs.

9. Housing Options Advice & Support

9.1 BHA will provide advice and support for all persons seeking housing. This will include how to apply and bid for our homes and how to apply for any priority a person may be entitled to. This information will be available on our web page, via Homehunt, in our offices and all housing staff will be trained to assist where required.

9.2 Information can be translated upon request and can also be made available in large print, braille or audio form on request.

9.3 BHA will ensure that our key partnering bodies are aware of the process to ensure vulnerable adults are supported in the search for housing.

9.4 BHA staff will assist someone to place bids if required, provide help and support with the registration process and provide Housing Options advice. Housing Options provides an avenue to examine all options available for housing other than social housing.

9.5 On occasion BHA will work with SBC placing bids or matching properties to applicants who require support in their search for housing.

9.6 When we are aware that an applicant requires support to sustain a tenancy we will ensure that this is in place with support agencies before any tenancy commences.

10. The Registration Form

10.1 Persons searching for housing can register with BHA online. Assistance is available for anyone having difficulty in registering and we will support using alternative methods. Should a

registration form be incomplete then staff will make efforts to contact to ensure we support those persons to access our choice based lettings system with equal opportunity.

- 10.2 Once a person is registered then they are issued with a unique registration number and are required to make a password of their choice. Both the number and a set question may need to be quoted in any communication with BHA staff. An applicant can begin to apply for housing as soon as their registration is live.
- 10.3 We aim to verify any registration within three working days providing all information is complete.

11. Assessment of Need

11.1 BHA allocates approx. 200-230 properties each year so demand for our properties is in excess of supply. To ensure we meet our objectives of housing those in most need we operate a priority pass system whereby those who meet the criteria of need are awarded a priority pass. An applicant must complete an application form for priority to be awarded. BHA can help and support this where required.

11.2 Priority will be awarded in the following reasonable preference groups (see Appendix 1):

- Domestic Abuse
- Harassment including Anti-Social Behaviour
- Statutory Homelessness/Relationship Breakdown (BHA tenants)
- Health
- Sustainable Housing Outcomes on Release for Everyone (SHORE)
- Armed Forces Veterans & Families
- Through Care After Care
- Prevention of Homelessness
- Overcrowding
- Underoccupancy
- Unsuitable Housing (against tolerable standard)
- Kinship Carers, Foster Carers and those Adopting
- First Affordable Home/Separated Households
- Flat to House
- Specific Need to be in the Community (Social, Community or Family Support)

11.3 *Domestic Abuse*

11.3.1 BHA work closely with SBC to tackle Domestic Abuse. Where an applicant has been identified as at high risk via a Multi-Agency Risk Assessment Committee (MARAC) then they will be awarded a Platinum priority pass.

11.4 *Harassment including Anti-Social Behaviour*

11.4.1 BHA will award Platinum priority to those assessed as experiencing harassment which includes serious anti-social behaviour. There must be documented evidence to support the declaration and will normally be provided by a Local Authority, Registered Social Landlord, Health, Social Work or Police.

11.4.2 Harassment can include:

- Racial
- Religious or sectarian
- Homophobic
- Transphobic
- Harassment of people with learning, physical disabilities and or, any recognised disability of any kind
- Sexual

11.4.3 Anti-social behaviour is wide-ranging and BHA staff will make an assessment as to whether the situation is serious enough to warrant priority. It is likely to be awarded when anti-social behaviour procedures have been followed but there is no improvement in behaviour and this is leading to a significant impact on the applicant(s)/applicant's family life.

11.5 *Statutory Homelessness/Relationship Breakdown (BHA tenants)*

11.5.1 A Gold priority pass will be awarded to applicants who are assessed as homeless by SBC and who are referred to BHA under Section 5 of the Homelessness (Scotland) Act 2003. These applicants will be considered for housing in accordance with the protocol set out between SBC and BHA. Where there is a support need identified BHA will work with SBC to ensure support is in place before an allocation is made to ensure a tenancy has the best chance of being sustained. BHA will support a Housing First and Rapid Rehousing approach and will work closely with SBC in developing these procedures and protocols. The greatest proportion of available homes will be allocated to those assessed as Homeless, in line with statutory guidance and our Community Housing Plan ratios.

11.5.2 BHA will award a Gold pass to existing BHA tenants demonstrating relationship breakdown.

11.6: *Health*

11.6.1 The four main registered social landlords within the Borders: BHA, Waverley, Eildon and SBHA, operate a unified health assessment procedure whereby we share information where required ensuring the applicant only has one form to complete in relation to their health.

11.6.2 Priority is awarded on three levels, Gold, Silver and Bronze and is graded as follows:

- **Gold** - Where an applicant has a health problem and is unable to return to their home, or unable to continue living in their own home because they would not be able to gain access to essential facilities unaided and/or they are at significant risk of doing so, or due to significant and enduring mental illness they are unable to return or continue to live in their current home and/or environment, and it is not practical to adapt their home to meet their needs.
- **Silver** - Where an applicant has a health problem and is living at home and they are unable to gain access to essential facilities unaided, and/or they would be housebound because they could not get out of their home unaided, or their mental illness severely restricts their ability to continue to live in their current home and/or environment and it is not practical to adapt their home to meet their needs.
- **Bronze** - Where an applicant has a health problem and is living at home and becoming less able to access essential facilities unaided, and/or they are becoming less able to get out of their home unaided, or they are becoming less able to cope in their current home and/or environment due to their mental illness, and it is not practical to adapt their home to meet their needs.

11.7 *Sustainable Housing on Release for Everyone (SHORE)*

11.7.1 BHA is committed to the SHORE standards which aim to reintegrate people leaving prison within the community. An applicant referred to us via this method will have a full support package and will be matched to a property.

11.8 *Armed Forces Veterans & Families*

11.8.1 Applicants serving in the Armed Forces can apply one year before their date of discharge and one year after. Gold priority will be awarded to applicants serving in the Armed Forces who:

- Are currently serving with one of the recognised Ministry of Defence Armed Forces, with less than one full year to discharge and;
- Have been discharged from the Armed Forces within the last year of applying for housing and;
- Have completed at least a 3 year fixed term contract or one full tour of duty.
- Has been discharged due to injury within the past 12 months.

Gold priority will also be awarded to the surviving spouse/partner or a non-dependent child aged 16 or older of a deceased Forces Personnel, who served in the armed forces within the past 12 months.

11.9 *Through Care After Care*

11.9.1 BHA is committed to a protocol in partnership with SBC and other social landlords within the Scottish Borders. Where an applicant is leaving care or has a looked after background, and is referred to us via Through Care After Care they will be awarded a Gold priority pass.

11.10 *Prevention of Homelessness*

11.10.1 A Silver priority pass will be issued to persons assessed by either SBC or BHA as being threatened with homelessness. Examples of this include but are not limited to:

- Relationship breakdown (non BHA tenants)
- Living in an insecure tenancy such as tied accommodation or having a Short Assured Tenancy which is coming to an end within 2-6 months
- Having a relationship breakdown with parents or another occupant of the home
- Having financial difficulties in making rent or mortgage payments within the current home
- Is living in a mobile home (not static)

11.11 *Overcrowding*

11.11.1 Priority applies when there are insufficient bedrooms or bed spaces in an applicant's existing property and they need to move to a larger property that is suitable for their needs. Applicants who are overcrowding their current homes will be awarded priority for each bedroom or bed space required, yet not met, at their present address. All children and unborn children will count as 1 person. Same sex children up to and including the age of 15 can share a bedroom. When a child reaches the age of 8 years they will not be expected to share a bedroom with a child of a different sex. If

there is an age gap of more than 8 years then children will not be expected to share a bedroom. Children who reside with their parents for 3 or more nights per week will be classed as permanent members of the household and treated equally. Confirmation of access may be required. Silver priority is awarded in all cases of overcrowding.

- 11.11.2 Same sex families will be ranked behind opposite sex.
 - 11.11.3 Same sex age gaps will be ranked behind opposite sex age gaps.
 - 11.11.4 Affordability will be discussed with the applicant in line with current government policy.
 - 11.11.5 There is a lack of larger sized family accommodation available in social housing within Berwickshire. Applicants with large families, who normally permanently reside together, who need a 4 bedroom or more property will be considered for accommodation where the move would reduce current overcrowding and occupancy of the new accommodation would not contravene the room and space standards as defined in the legal definition of overcrowding contained within Part VIII of the Housing (Scotland) Act 1987.
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- 11.12 *Underoccupancy*
 - 11.12.1 Underoccupying occurs when a person or family do not use one or more of the bedrooms available to them within another registered social landlord's or local authority's property within Scotland. When this happens a Silver priority pass will be granted appropriate to the household size.
 - 11.12.2 If the applicant is a tenant of BHA and has two or more bedrooms additional to their needs, BHA will permit a move to a home within our stock where the applicant has one bedroom additional to their needs. Additional to this BHA currently has a small budget to incentivise downsizing amongst our stock. This amounts to £500 per additional room and is subject to change. Applicants will be assessed as per our transfer criteria.
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- 11.13 *Unsuitable Housing*
 - 11.13.1 Where a team within SBC (Environmental Health) deem an applicant's residence to be in poor condition a Silver priority pass will be awarded.
 - 11.13.32 Should an applicant feel the property they currently reside in is unsuitable but our priority categories do not cover their situation,

they can apply for a discretionary Bronze pass using this category.

11.14 *Kinship Carers, Foster Carers and those Adopting*

11.14.1 Where an applicant has been approved for adoption, fostering or kinship care then BHA will award a Silver priority for rehousing if their current home does not meet their needs. BHA will work with SBC Children and Young Peoples service to decide at what stage of the applicant's application to become a Caregiver it is appropriate for priority for housing to be given. Each application will be assessed on its own merit.

11.15 *First Affordable Home/Separated Households*

11.15.1 Where an applicant is looking to set up home for the first time for example is leaving the parental home, setting up home with a partner, leaving halls of residence or sharing accommodation with persons who are not their family, BHA will award a Bronze pass.

11.15.2 Where applicants are separated but would otherwise normally live together, then a Bronze pass will be awarded.

11.16 *Flat to House*

11.16.1 A Bronze priority pass will be awarded for (BHA tenants only):

- Those living in flatted accommodation but who have children under the age of 10. The applicant must have resided within the property for at least 12 months.
- Those who have lived in flatted accommodation with a communal entrance for over five years and wish to move to a property with own front door

The pass that is awarded will reflect the household size and need.

11.17 *Specific Need to be in the Community (Social, Community or Family Support)*

11.17.1 Where an applicant requires to move to an area to:

- Give or receive support
- To take up or retain employment
- To gain education
- Be nearer amenities or services
- To maintain contact with children

- 11.17.2 We will consider the nature and frequency of such applications (such as public transport, services in the area, where the primary income earner is, access to a car etc.). Should applications meet criteria then a Bronze pass will be awarded.
- 11.18 Applicants can apply for as many priority passes as they feel they qualify for although only one priority pass will be awarded. The pass awarded will be at the highest level.

12. Allocation of Properties

Properties are allocated in the following manner:

- Best Use (Note that in the allocation of two bed upper flats couples and those with access of less than three nights per week are classed equally to those requiring both bedrooms. Those with access of over three nights per week, should they wish, will also be considered.)
 - Level of Priority
 - Date of priority
 - Date of Registration
- 12.1 For the purpose of this policy BHA will normally look to allocate to a family group in the first instance. A family group is defined as a basic unit consisting of immediate family: parents and their children. Extended family such as Uncle, Cousin, Sister (of parent) etc. will be considered after the family group. Full time live in carers are classed as a family unit, overnight carers with their own home will be classed behind a family unit. The Housing Services Manager may override this rule and we reserve the right to do so in exceptional circumstances or where we feel this is reasonable.
- 12.2 The applicant who will be considered for housing will be contacted within 48 hours of the closing date unless there are exceptional circumstances. Contact will be via the applicant's email or 'phone call unless there are exceptional circumstances. An applicant has 48 hours to respond to any offer, if the applicant has not responded we will try and make contact the next working day. If contact fails we will move to the next suitable applicant and the offer will be classed as a refusal. If the applicant has homeless priority then we will liaise with a homelessness officer within SBC. Applicants are entitled to two reasonable offers, should an applicant refuse two reasonable offers then their application can be placed on hold for six months.
- 12.3 Any offer is provisional and subject to circumstances being confirmed, proof of residency (if required) provided and a tenancy reference obtained. We recognise that a reference may not

always be obtainable however should a reference not be satisfactory we may decide to retract the provisional offer.

- 12.4 Offers that are retracted are normally due to a poor reference, change in circumstances (e.g. different household makeup) or false information. When an offer is retracted the applicant has 3 working days to appeal the decision. The Housing Services Manager will review the appeal as a Stage 1 complaint whilst holding the property. If the appeal is not upheld then the applicant has the right to register a Stage 2 complaint however BHA will not hold the property for the applicant at this stage.

13. Poor References/Transfer Criteria

- 13.1 Should an applicant be in arrears (or tenancy related debt) at point of offer then the Association will expect the debt to be under one twelfth of the annual rental due and the applicant to have made payments for at least three months. If this is not the case then the applicant will be expected to clear the outstanding debt in order to be allocated a tenancy with us. In exceptional circumstances the Housing Services Manager may waive this condition.

- 13.2 Where a reference is provided stating that a property is in poor condition or there is anti-social behaviour then we will retract any provisional offer made and place the application on hold (see Suspensions/Held Applications/Bypassing).

14. Suspensions/Held Applications/Bypassing

- 14.1 There are some circumstances where BHA may suspend a registration although we aim to keep these to a minimum. We will inform the applicant why they have been suspended, how long the suspension is in place for and any action the applicant can take to end the suspension. We will also inform the applicant how they can appeal any suspension. We will review suspensions once every three months. Registrations may be placed on hold/suspended for the following reasons:

- Change in Circumstances/Incomplete information at Registration - we may need verification of the change or additional information
- Outstanding Tenancy Related Debt – where an applicant or member of their household has outstanding arrears or other tenancy related debt (such as rechargeable repairs) which amounts to more than one twelfth of the annual rent, the registration will be placed on hold unless an agreement has been in place and adhered to for no less than three months.

- Anti-social Behaviour – where an applicant, or a proposed member of their household, has:
 - acted in an anti-social manner or been responsible for harassment in the vicinity of the property
 - caused extensive damage to a current or previous tenanted property
 - behaved in a threatening or violent way towards our staff or tenants
 - been responsible for using a former home for illegal purposes which are, or were, likely to endanger or cause nuisance or harassment to neighbours (e.g. drug dealing, prostitution, fire raising)

There must be documented evidence to support our reasons for suspending any application. This can include a Police or Landlord report, history of criminal conviction, eviction from a former home, ASBO or where an applicant has a Short Scottish Secure Tenancy (or equivalent) due to Antisocial behaviour. If an applicant demonstrates there are valid reasons that their behaviour has changed and behaviour will not re-occur we will remove the suspension. In any offer of tenancy a Short Scottish Secure Tenancy will be offered if this behaviour has been within the last three years.

- Refusal of Offers – if an applicant makes two reasonable refusals of offers then they can be suspended for six months.
- Fraudulent or False Information – if an applicant has deliberately provided false information within their application then the registration will be suspended for six months.

14.2 On occasion, we may bypass an applicant for a property. Bypassing is where we do not make an offer of a property to an applicant who would have otherwise received a provisional offer. Examples of where this may be done are where we know the property does not meet a persons assessed needs or if where the applicant verbally communicates the note of interest/bid was made in error. Should we bypass an offer we will keep a record of why this happened.

15. New Build Developments

15.1 Where BHA delivers a new build development 50% will be allocated to existing BHA tenants where there is demand. The remaining 50% will be allocated to reflect our targets.

16. Applications from Homeowners

16.1 Homeowner refers to an applicant or member of their household who is the owner of a property. We will make it clear to any

person who is a homeowner that there is a legal requirement for them to occupy their tenancy as their only or principal home.

17. Adapted and Amenity Housing

17.1 When a property which is adapted for physical disabilities becomes available we will allocate the property to an applicant who requires the adaptations. Should we be unable to identify a household requiring the adaptations then we may let the property to a household with general needs. Should a household who requires the adaptations subsequently be identified we will offer suitable alternative accommodation to the occupying household and if necessary take legal action to recover possession of the property. BHA will make this clear to the general needs household at offer of property and will assist with moving costs.

17.2 Some housing may be reserved for those who are age 55 and over. We will clearly stipulate this within our advertising. Should no one apply for the property that requires such housing we will consider health needs first followed by applicants 50-55, 45-50 etc. (This does not apply to Gowanlea, Boston or Linkim Court where the minimum age will be 55.)

18. Housing in Multiple Occupancy (HMO)

18.1 BHA has two properties with a HMO licence however these are designed for those with physical disabilities and are allocated via Scottish Borders Council. BHA will not allocate properties which would result in three or more unrelated people residing in the property as this would create a HMO (House Share).

19. Decant

19.1 BHA reserve the right to use an unlimited number of properties as accommodation for tenants who need to be decanted on either a temporary or permanent basis. This type of move will take priority over any type of allocation.

20. Pets

20.1 We will state clearly when pets are not permitted within any of our properties. Applicants are responsible for ensuring they understand this when placing a bid. A tenant must request permission to keep a pet, however pet numbers will be limited.

21. Mutual Exchange

21.1 BHA recognises that a mutual exchange can help solve a housing need or choice especially in areas of high demand. We will continue to promote Mutual Exchange via Homewrapper software where our tenants are able to register for free.

21.2 Tenants can contact us to inform us that they wish to exchange and we will not refuse this unless there is a reasonable reason to do so. Reasonable reasons can include but is not limited to:

- Rent arrears or tenancy related debt of over one twelfth of annual rental and where an agreement is not in place
- Anti-social Behaviour
- The move would lead to overcrowding or underoccupancy
- The property was designed or adapted for certain needs and there is no one within the household that requires the features
- The property is designated to persons of a certain age and no one in the household meets this criteria
- The property and/or garden is in poor condition

22. Succession, Subletting and Assignment

22.1 Where a tenant wishes to assign (in whole or make a joint tenancy) a tenancy, the following applies:

- All parties must have resided at current property for a minimum of 12 months.
- BHA must have an up to date declaration from the existing tenant of the household, including the interested party, from the date they moved in to the property. The 12 month qualifying period cannot begin until we have been informed.
- If BHA do not have this then permission cannot be granted.
- We can refuse permission if it is reasonable for us to do so. Reasons can include but are not limited to rent arrears, anti-social behaviour, where we would not allocate the tenancy under our allocations policy to the person a tenant wishes to assign to or the assignment leads to underoccupancy.

22.2 Where a tenant wishes to sublet their tenancy the following applies:

- The tenant must have been a tenant of the property for a minimum of 12 months
- The tenant is responsible for all legal fees including BHA's
- We will consider the application taking into account the amount of rent proposed to be charged and give you a Decision within 28 days

- Should a sublet be approved the applicant remains our tenant and said tenant still retains all responsibility for the tenancy.

22.3 Where a tenant has died people residing within the property may have the right of succession. These people fall into three categories:

- A joint tenant or a partner, husband, wife or civil partner of the tenant who dies
- A member of the tenant's family aged 16 or over
- A carer who is providing care for the tenant, or a member of the tenant's family who has given up their own home to care for the tenant.

22.3.2 To protect the rights to succession a tenant must have told us about a change in household as soon as it happens. If we are not aware officially of someone residing within a property then the rights to succession are affected.

22.3.3 Under the Housing (Scotland) Act 2001, a tenancy can only be handed on twice through the right of succession.

22.3.4 If you are a joint tenant the tenancy does not end when one joint tenant dies and rental obligation continues

22.3.5 Should someone residing within the property qualify to succeed to a tenancy but chooses not to then they must provide four weeks written notice and leave the property within 3 months.

23. Local Lettings Initiatives

23.1 We may consider using local lettings initiatives in specific areas. This may mean taking into account local connection where turnover is low and local people have difficulty accessing housing or in areas of low demand to help sustain the community and stimulate demand. There are other reasons where Local Lettings may be taken into consideration, however, any initiative will always operate alongside this policy and comply with legislation. There will be information available supporting why such an initiative is required alongside supporting documentation which is published.

24. Review of Registrations

24.1: BHA will contact the applicant on the anniversary of their housing registration to ensure that their household makeup remains as stated and their need has not changed. We will also ensure that the applicant wishes to remain on the register. We will ensure that

the gathering and holding of information from our applicants complies with GDPR.

25. Appeals & Complaints

25.1 Any appeals or complaints will be handled using our complaints policy. Stage 1 will normally be dealt with by the Housing Services Manager and Stage 2 by the Operations Director.

26. The Role of the Board

26.1 The role of our Board is to set and review the policy whilst monitoring the progress against policy aims. The Board will approve the policy and ensure it is delivered. The Board have no involvement in the allocation of our properties or decisions about any applicant; this is the responsibility of staff within BHA.

27. Allocations to staff or family members

27.1: Any member of staff or their family (for example sister, step-brother, cousin, uncle etc.) is entitled to apply for housing with BHA. Our application form will ask applicants whether or not they work for BHA or have a family member who works for us. If this is the case the member of staff concerned will have no involvement in assessing any priority or allocating any property.

27.2 Where priority is applied a senior member of staff will check the application and verify this. There will be a clear audit trail.

27.3 Where an offer of housing is to be made a senior member of staff will verify this and another senior member of staff, who is not normally involved in the day to day allocation of properties, will verify the allocation. A full audit trail will be kept.

28. Review of Policy

We will review this policy every three years or when there are any legislative changes. Where the policy is working well BHA will simply make minor compliance changes to the policy reporting to the Board the areas of change for approval. Where a full review is required we will consult with applicants on our register, our tenants, the tenant volunteers and other stakeholders.