



**PRIMA**  
GROUP

**Allocations  
Policy**

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## Allocations Policy

### 1 Aim of the Policy

This policy details how Prima Group will make the best use of available housing and how we will ensure that our lettings are compatible with our charitable objectives. It also explains how we will co-operate with Local Authorities to support them in meeting housing need in their area and how we will assist with meeting their obligations under the Housing Act 1996.

The policy outlines our approach to letting our homes and aims to comply with the regulatory framework and relevant legislation.

This Policy details Prima Group's approach to identifying new tenants for vacancies that occur in our general needs, sheltered, social and affordable rented homes. We offer homes to those whose housing needs are not met by the private sector and who meet our charitable aims.

### 2 Who does this Policy apply to?

This policy applies to all allocations made by Prima Group, this includes allocations made through nominations, choice-based lettings, Prima Group's own waiting list and direct matches to properties in exceptional circumstances.

### 3 Financial Liability

Prima Group will meet the cost of all the marketing of properties. The tenants will meet any financial liability in moving home.

### 4 Allocations

#### 4.1 Eligibility for Housing

People aged 18 or over will be eligible to apply to rent our homes. Applicants for housing who have applied through any Local Authority scheme will usually already have been confirmed as being eligible for social housing. There may be occasions where we will undertake further checks prior to allocation to verify eligibility.

Applicants who apply directly to Prima to join our waiting list will be subject to a 'Right to Rent' check to ensure that they are eligible to rent a home. If an adult household member is found not to have a Right to Rent in the UK, the household will not be offered a home. Details on Right to Rent can be found on the Government website [www.gov.uk](http://www.gov.uk).

Applications from homeowners and customers earning £60,000 or more (combined income of applicants) will not usually be accepted unless there are exceptional circumstances e.g., the type of property required is unavailable on the open market.

## 4.2 Property Type Eligibility

Prima Group applies the same property size eligibility criteria that are used to assess benefit eligibility for help with housing costs. A separate bedroom is required for:

- a. A couple (aged 16 or over) who live together as partners.
- b. A single adult age 21 and over.
- c. Two children under 10 who are part of the same family.
- d. Two children of the same sex under 21 who are part of the same family.

Prima Group will always seek to maximise the occupancy of a property to ensure that we make the best use of our homes. There may be some occasions where an allocation is made to an applicant who may under occupy the property, in these circumstances the decision will be at the discretion of the Housing Manager.

The Housing Manager will consider requests for an additional bedroom where an applicant:

- Receives support from carers who may be required to stay overnight.
- Has medical requirements.
- The applicant has formal shared care of a child/children.
- The applicant is a prospective foster carer or adoptive parent.

Clear independent evidence of the above must be provided to enable a decision to be made.

Our older person's accommodation will only be allocated to applicants that meet the age criteria for the scheme (usually over the age of 55) and/or the person requires additional support.

## 4.3 How we allocate our homes

Prima allocates available homes in the following ways:

- By accepting nominations from the Local Authority based on the assessment of housing need. Prima Group has entered into nomination agreements with each of our Local Authority partners. These agreements detail how Prima Group will work with the Local Authority to help those on the Housing Register and the proportion of available properties that will be let by nomination.

Most of the Local Authorities we work with use Property Pool Plus, a choice-based lettings system that is web based. Prima Group is a partner member of this scheme and more details can be found at <https://www.propertypoolplus.org.uk>.

All lettings for our Leasowe properties are made through Property Pool Plus.

- By direct application to Prima’s own waiting list. We allocate half of all our available homes (excluding Leasowe properties) in this way. We do not maintain long waiting lists for areas or for properties that rarely become available.

For those areas and property types that become available on a regular basis we will maintain a waiting list. Lists will remain open; but will be reviewed on an annual basis.

In areas and for property types that rarely become available, any vacancies that arise will be advertised through Property Pool Plus.

All applications to our own waiting list are awarded points subject to housing need. Please see appendix 1 for details of how points are awarded. Applications with the most points will be considered first for any available properties. Where two applicants have the same points, the applicant with the longest waiting date will be considered first for any vacancy.

- By direct matching properties to existing tenants in exceptional circumstances where it is no longer safe for a tenant to continue living in their home. In such circumstances we will request supporting evidence from partner agencies such as Police and Social Services. These allocations are known as Management Transfers and must be authorised by the Housing Manager or Group Head of Housing.

Examples of exceptional circumstances that will be considered include serious cases of anti-social behaviour and harassment (including serious or targeted hate crimes), domestic violence, high risk safeguarding concerns and emergency health and safety issues such as fire or flood.

#### **4.4 Withdrawal of offers**

All offers of accommodation are made on a provisional basis and there are few occasions when offers are withdrawn. Such reasons can include where an applicant may be unable to take up the tenancy within a reasonable timescale.

At the point of offer, it is anticipated that the prospective tenant will be in a position to move and to provide all the relevant documents to enable appropriate checks to be carried out and a tenancy agreement to be signed.

There may also be some occasions when Prima requires the property to meet an emergency housing need, in such circumstances it is necessary to withdraw an offer to meet this need. Such decisions will be at the discretion of the Housing Manager.

## 4.5 Refusal of applicants

Prima Group seeks to allocate properties as efficiently as possible whilst making best use of our homes and creating sustainable communities.

There may be some occasions where an applicant is not suitable for a property and in such cases, we may refuse to make an offer.

The reasons for refusal include:

### 4.5.1 Debt

Where it is identified that an applicant has a current debt to Prima Group or a former housing related debt either owed to Prima Group or another landlord.

We will consider individual circumstances in reaching a decision on whether to allocate a property, in doing so we will apply the criteria set out in Property Pool Plus.

We will only refuse applicants where the risk of non-payment of rent is considered to be high.

### 4.5.2 Affordability

Prima Group seeks to create sustainable communities; our aim is for all tenancies to succeed. We carry out affordability checks prior to any formal offer of accommodation. These checks include using on-line tools such as 'entitled to' to ensure all benefit entitlements are considered and the use of Experian to establish if there are any previous debts.

The checks are used to establish if the applicant can pay their rent and service charge. Where we identify that an applicant will have challenges in meeting their tenancy obligations, we will provide tenancy support or refer to specialist financial inclusion services for more detailed help and advice to enable them to sustain their tenancy with us.

There may be occasions despite considering the support available, that it is clear an applicant will not be able to afford to pay the rent and other charges on the property that they have applied for. In such situations Prima Group may refuse to make an offer of accommodation. In such situations we will provide advice and guidance on how the applicant can sustain a tenancy in the future.

### 4.5.3 Anti-Social Behaviour

Where there is evidence that the applicant or a member of their household has perpetrated anti-social behaviour, the application may be refused.

The individual circumstances of the anti-social behaviour will be considered. If the behaviour was such that it would constitute a risk to the tenancy, would cause a nuisance to other tenants and/or the local community or would be a serious threat to Prima Group staff and contractors, the application will be refused on the basis that the tenancy could not be sustained.

Such decisions will only be taken following careful consideration of all the facts, including how long ago the incidents occurred and how the person has conducted themselves since.

#### **4.5.4 Tenancy Breaches**

Where there is evidence that the applicant or a member of their household has seriously breached the tenancy agreement or has behaved in a way that would constitute a breach of tenancy and it would be reasonable for the Court to grant a Possession Order; an application for accommodation may be refused.

Examples of tenancy breaches include:

- Failure to end a tenancy in line with the tenancy agreement.
- Malicious damage to a property.
- Failure to comply with health and safety requirements.

#### **4.5.5 Criminal Behaviour**

Where an applicant or member of their household has an unspent conviction for a serious offence that would potentially pose a risk to Prima's customers, the local community, or our staff the application may be refused. Some examples of serious offences include:

- Public order offences, nuisance, vandalism.
- Offences relating to hate crimes.
- Violence.
- Dealing, supplying, or cultivating controlled drugs.
- Burglary, robbery, or theft

This list is not exhaustive, and consideration will be given as to how long ago the offences occurred and how the applicant has conducted themselves since the conviction.

#### **4.5.6 False Information**

Where an applicant is found to have deliberately provided false information or has withheld information that has led to an improved position in respect of an offer of accommodation, any offer of accommodation may be refused.

Additionally, any direct applications to Prima Group will be re-assessed based on the correct information. Where applications have been made via Property Pool Plus, the

relevant Local Authority will be advised.

#### **4.5.7 Unmet Support Needs**

Following pre-tenancy checks, should it be identified that an applicant has unmet support needs and we have been unable to identify sufficient suitable support for that person to enable them to sustain a tenancy; the tenancy may be refused.

Our aim is always to seek appropriate support to enable the person to successfully maintain their tenancy.

#### **4.5.8 Local Lettings Policy**

We may develop local lettings policies for some neighbourhoods or specific schemes to address local issues and to help in building sustainable communities. Properties that are subject to a local lettings policy will have additional criteria applied in respect of applicants who are eligible to apply for the property.

#### **4.5.9 Applications from owner occupiers**

Applications from homeowners where equity exceeds £60,000 and from customers earning £60,000 or more will not usually be accepted unless there are exceptional circumstances e.g., the type of property required is unavailable on the open market. Where a homeowner has less than £60,000 equity, proof of this will be required in addition to proof that the property has been sold or is being actively marketed.

#### **4.5.10 Offers to Employees, Board Members and Involved Residents**

Any decision to allocate properties, re-house or transfer Board Members, involved residents who are part of the formal governance structure of the Group, or members of the Executive Team and/or their close relatives must be approved by the Chief Executive and the People and Remuneration Committee, prior to any offer being made, and the interest of that person must be disclosed.

Any decision to allocate properties, re-house or transfer involved residents or employees (other than members of the Executive Team) and/or their close relatives must first be approved by the Chief Executive, or in their absence (or inability, for example due to conflict of interests) the Company Secretary, prior to any offer being made and reported to Board at the earliest opportunity. and the interest of that person must be disclosed.

Any Director, employee, Board Member or involved resident:

- With an interest in; or
- Who has a close personal relationship with ...



... a person whose application is being considered under the paragraphs above will declare that interest and will discontinue any involvement they might have in that person's application.

## **5 Making sure we do what we say**

This policy will be reviewed as and when needed but as a minimum of every 3 years.

This policy will be adhered to for all allocations.

When implementing this policy, Officers will follow guidance set out in the Property Pool Plus policy and procedure and in Prima Group's allocations procedure. Performance will be monitored and included in the operational reports to Boards.

All lettings are reported through the CORE system.

This policy also complies with the Regulator of Social Housing's regulatory framework.

## **6 Other things to bear in mind**

### **6.1 Prima policies and procedures**

This policy must be read together with:

- Probity Policy.
- Declaration of Interest Procedure.

### **6.2 Legislation and Guidance**

Several pieces of legislation and guidance have informed this policy including:

- Data Protection Act 2018.
- Homelessness Reduction Act 2018.
- Housing Act 1996 (as amended by the 2002 Homelessness Act).
- Equality Act 2010.
- The Localism Act 2011.
- Welfare Reform and Work Act 2016.

## **7 Consultation**

This policy has been consulted on with Prima tenants and residents via the Group's Social Media between the period 19/01/2021 to 02/02/2021. Existing and future tenants were asked about their opinions on the policy.

## 8 Equality Impact Assessment

Prima welcomes feedback on this policy and the way it operates. We are interested to know of any possible or actual adverse impact that this policy may have on any groups in respect of gender or marital status, race, disability, sexual orientation, religion or belief, age, or other characteristics.

The policy has been screened to determine equality relevance for the following equality groups: gender or marital status, race, disability, maternity or pregnancy, sex, sexual orientation, religion or belief, age, or other characteristics. Our application for housing process includes translation widgets for non-English speakers and we will complete applications on behalf of applicants if they are digitally excluded or need support to do this. We collect information from new tenants on diversity characteristics, this is so we can monitor which diversity groups may or may not be being allocated homes and so we can tailor services for any group specific needs.

## 9 Data Protection

In taking applications under the policy, we are aware that we will be handling personal information. All handling of the personal data will be conducted under the Group's Data Protection Policy ensuring compliance with the Data Protection Act 2018.

Personal data that is inappropriately accessed or disclosed may constitute a data breach. The GDPR (General Data Protection Regulation) requires organisations to keep a record of all data breaches and, where the breach is likely to result in a risk to the rights and freedoms of individuals, the organisation must notify the Information Commissioner within 72 hours of becoming aware of the breach. If the data breach results in a high risk to the rights and freedoms of individuals, those individuals must be notified without undue delay.

## 10 Document Control Data

<b>Version:</b>	V12021
<b>Author:</b>	Louise Hooton, Group Head of Housing
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## Appendix 1

All direct applications to Prima Group for our waiting list will be assessed using the following points system:

### Current Occupancy:

Criteria	Points Awarded
Tenancy with housing association	0
Tenancy with private landlord	5
Homeowner	0
Living with family/friends	5
Asked to leave (by family/friends)	8
No fixed abode	7
Leaving care	5
Leaving forces	5
Leaving prison	5
Tied accommodation	5
Assessed as homeless	10
Served Section 21 as landlord is selling property or is asking for possession	8
Other	0
Internal Transfer	10

### Living Situation:

Criteria	Points Awarded
Property unfit to live in	10
Property in poor condition	5
Property requires major repair	7
Property lacks amenities	7

### Reasons for rehousing:

Criteria	Points Awarded
Fleeing race or hate crime	10
Fleeing domestic violence	10
Life at risk	10
Overcrowded by 1 bedroom	3
Overcrowded by 2 bedrooms	5
Overcrowded by 3 bedrooms	7
Overcrowded by 4+ bedrooms	10
Under occupation by 1 bedroom	5
Under occupation by 2+ bedrooms	10
Medical condition can be improved by rehousing	5
Medical condition can <b>only</b> be improved by rehousing	10

Relationship breakdown/family stress	5
To be near family/friends/support	5
To be near employment	5
To live independently	5
Affordable Accommodation	5
Children/elderly who live above 1 <sup>st</sup> floor	5

(2 additional points will be awarded if an applicant is on the waiting list more than 12 months)