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## LETTINGS POLICY

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## **1. Introduction**

- 1.1 Sutton Housing Society (SHS) was established in 1964 and is a small, independent housing society, registered with and regulated by the Regulator of Social Housing.

1.2 SHS provides affordable rented housing for those in need in the London Borough of Sutton. We operate our own waiting list for our regular homes for older people (excluding Cloverdale Court) and for our current tenants (residents) that wish to transfer within our older people's accommodation. All other lettings are made via local authority nominations.

1.3 This lettings policy sets out how SHS will help meet housing need and support the local authority to fulfil its housing duties. A key objective of SHS is to ensure that the number of empty homes is as few as possible at any time.

## **2 Legal and regulatory framework**

2.1 SHS' lettings policy takes account of, and meets, the requirements of the Regulator for Social Housing. SHS adheres to the regulator's tenancy standard (where relevant) and compliance with all regulatory standards is reviewed each year.

## **3 Scope**

3.1 This policy applies to the letting of our older people's homes, our new build homes and SHS resident transfers to and within our older people's accommodation.

3.2 There are some exceptions to the lettings policy in terms of our approach and these are outlined in section 5 below.

3.3 All vacancies in our general needs housing are let via nominations to us by the local authority; we do not hold a waiting list for this type of accommodation.

## **4 Access to housing**

4.1 Access to housing is through two main routes, either through local authority nominations or direct with SHS. For all direct lets from our waiting list, SHS must comply with the "right to rent" guidance; the local authority is responsible for ensuring compliance with this guidance for all nominations for housing it makes, although we reserve the right to check documents to confirm the nominee's status.

### **4.2 'Right to rent scheme'**

4.2.1 The right to rent scheme was introduced in February 2016 and applies to all tenancies let after 1 February 2016. It places a responsibility on housing associations to ensure that they only let their accommodation to people that have the right to live in the United Kingdom e.g. all direct lets from our waiting list. This responsibility also applies to residents with lodgers; they have the responsibility to check that their lodger has the right to reside in the UK.

4.2.2 The right to rent checks must include not just to the applicant but also any occupiers aged 18 and over, even if they are not named on the tenancy agreement.

#### 4.2.3 *Home Office Landlord Checking Service*

SHS can access this service if we need verification from the Home Office because:

- the person has an application or appeal outstanding with the Home Office
- the Home Office is currently holding the person's documents

#### 4.2.4 *Covid-19 and right to rent checks*

Right to rent checks were temporarily adjusted due to coronavirus (Covid-19), to make it easier for landlords to carry them out. As of 30 March 2020, the following temporary changes have been made:

- checks can now be carried out over video calls
- applicants can send scanned documents or a photo of documents for checks using email or a mobile app, rather than sending originals
- landlords may use the Landlord's Checking Service if a prospective or existing tenant cannot provide any of the existing documents

### 4.3 ***Nomination rights***

4.3.1 The local authority generally has 50% nomination rights to our existing (as at March 2021) older people's accommodation; this is in effect every other vacancy. For our extra care scheme (Cloverdale Court), the local authority has 100% nominations to the existing flats (as at January 2021).

4.3.2 For SHS direct housing applicants and transferring residents, SHS will use the remaining 50% of vacancies to directly rehouse people from its waiting list and its internal transfer list; this will be on a 50 / 50 basis. Therefore, the following 'quotas' will generally apply to our existing homes as at March 2021:

- 50% of vacancies are offered to direct applicants on our waiting list and to our transferring residents including qualifying successors, discretionary lets and management moves
- 50% to the local authority for all older people's accommodation, excluding our extra care scheme

### 4.4 ***Local authority nominations***

4.4.1 All applicants nominated to us by the local authority, must meet SHS' own criteria before being accepted for housing e.g. they will have to have a satisfactory history (where applicable), and provide an up to date care / support plan at the nomination stage. In addition, they will need to complete SHS' housing needs assessment form.

4.4.2 If the local authority are unable to refer suitable applicants within 3 working days of close of advertising a vacancy, they must advise SHS who will revert to applicants on the

SHS waiting list / transfer list without impacting on our eligible 50% of lettings i.e. these lets will be in addition to our 50% of lettings.

4.4.3 If the local authority provides three sets of unsuccessful nominations, SHS may revert to applicants on its own waiting list / transfer list.

#### **4.5 SHS direct lets**

4.5.1 We accept applications for housing from people aged 55 years and over, for our older people's accommodation. However, applicants for our wheelchair standard flats can be below the 55 year age threshold, but no younger than 40 years old and must require this special accommodation. Please note that in these circumstances, cases will be assessed on a case by case basis and may involve other partners.

4.5.2 Applicants are selected in order of priority from within their allocated 'band', having regard to any changes of circumstances since the last prioritisation. Due to the nature of the client group, an annual review of applicants is made in April each year and prioritisation reassessed in accordance with their current needs.

4.5.3 Apart from those included in our exceptions list (see section 5 of this policy) applicants to our waiting list:

- Must live in the London Borough of Sutton or be in need of support from relatives or friends living in the Borough apart from where hardship may be caused (see exceptions in section 5 below.) Please note that where support is required from relatives, we will ask for details of the level of support and may seek evidence from a medical professional or social services
- Must be able to live independently or look after themselves with support from relevant external community support
- Priority for larger one-bedroom flats, those above the GLA development standard, is given to couples, as is priority for 2 bedroomed accommodation or to individuals with the need for an overnight carer on site. Please note that for 2 bedroomed accommodation, the applicant / resident must be aware that any benefits received may not cover the rent and service charges in full and that they would need to make up any difference to pay the rent in full
- The resident is not the owner of a property elsewhere or is in the process of selling the property. There is a cap for homeowners being eligible for joining SHS list for a 1 bedroom with no more savings or assets than £250,000 and for a 2 bedroom, no more savings than £300,000
- Have permanent leave to remain, therefore complying with the right to rent requirement (where there is time limited leave to remain, confirmation that recourse to public funds has been granted MUST be obtained)
- There may be exceptional circumstances not covered above which will be considered on merit by the Community Housing Manager (CHM) and Operations Director (OD)

#### **4.6 SHS Transfers**

- 4.6.1 All current SHS residents living in their SHS homes for at least twelve months, will be entitled to apply for a transfer to a home within our older people's housing schemes (excluding our existing extra care scheme) if they meet the age and residency criteria. Applications for transfer will be assessed using similar criteria as direct housing applicants to prioritise those most in need of a transfer.
- 4.6.2 We positively encourage existing residents to consider other housing options, such as mutual exchange, making an application to the Council's Housing Register, registering with the national Seaside and Country Homes scheme (if considering a move from Greater London and where age allows). We will proactively suggest exchanges where we identify opportunities within our own waiting list and portfolio of residents seeking a transfer. This is in addition to SHS residents accessing the free Home Swapper scheme.

#### **4.7 Sensitive and / or management lettings**

- 4.7.1 Where there has been a housing management issue at a specific scheme, such as serious anti-social behaviour, SHS may decide to treat the letting of vacancies arising as a "sensitive let" in order to minimise the risk of the issue reoccurring and to give the community time to recover. There may also be (rare) times when we need to safeguard the safety of an existing resident.
- 4.7.2 A local lettings plan can be introduced where more than one sensitive letting is required. This must be recommended by the Community Housing Manager (CHM) and approved by the Operations Director (OD).
- 4.7.3 The relevant Community Housing Officer (CHO) must prepare a report on the reasons for the sensitive / management letting, (e.g. domestic violence or a severe neighbour dispute) and will present this to the CHM who, in conjunction with the OD, will consider the situation and make a decision on the application. These lettings will come from the SHS 50% access rights to our vacant homes.
- 4.7.4 An application for sensitive / management moves will be rejected if there is:
- A risk of re-offending
  - The allocation of a property is in contravention of any probation conditions and / or restraining orders, criminal behaviour orders of exclusion orders
  - Existing residents' human rights may be jeopardised
  - Existing and new residents will be unreasonably put at risk
  - Other risks are identified that cannot be reasonably managed by SHS
- 4.7.5 Please note that each case will be assessed on a case by case basis; if we feel the choice of areas is too restricted in the context of the urgency, the request is likely to be refused.

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4.7.6 A report stating the reasons for rejection will be placed on the applicant's file.

#### **4.8 SHS decants**

4.8.1 On occasions, particularly where undergoing major works or redevelopment, SHS may be required to decant existing residents temporarily or permanently from their current homes.

4.8.2 Residents living in properties identified for decanting, will be given priority over all other housing applications / transfers. These residents may be entitled to a home loss and disturbance payment as set out in the Land Compensation Act 1973.

#### **4.9 Lettings to SHS Staff and Board Members**

4.9.1 SHS staff or Board Members may be nominated to us for housing in our older people's accommodation by the local authority or they may apply to join our waiting list, subject to meeting the qualifying criteria.

4.9.2 The staff member must complete a declaration of interest form when applying directly to SHS for housing and they must update this if housed by SHS. A review to ensure compliance with our governance arrangements will also be carried out.

4.9.3 No preferential treatment may be given to staff in need of housing. Any direct application to our waiting list must be approved by the Chief Executive.

4.9.4 Any nomination from the local authority which includes a member of our staff, or any direct let, must be approved by the Operations Director and the Chief Executive.

#### **4.10 New homes**

4.10.1 SHS is developing new homes for older people, largely on existing sites. We are using our own funds and accessing grants from the Greater London Authority. As this is the case, there are no nomination agreements in place with the London Borough of Sutton for these homes.

4.10.2 However, SHS is committed to supporting the local authority and assisting with housing individuals in need and will, at our discretion, ensure that the local authority has access to some new homes and to at least 50% of any subsequent vacancies that arise.

4.10.3 The new homes will be let at local affordable rent levels (rather than social rent levels). There is one exception to this; where a current resident has been decanted to one of the new homes permanently, they will pay the same rent as they previously paid on their former home, as if they had not moved.

## **5 Lettings policy exceptions**

5.1 SHS is committed to ensuring that it contributes to the local authority's strategic housing aims and those of the government. On occasion 'one off' schemes are put in place that SHS may wish to be part of and which, potentially, fall outside of our own lettings policy.

5.2 SHS is aware of four areas where this can occur:

- Veterans Nominations Scheme
- Hardship grounds
- Immediately available homes
- Commercial lettings including garages / parking spaces

5.3 *Veteran's nomination scheme*

5.3.1 Up to two homes a year from our older people's accommodation, can be let to ex-service personnel. Whilst these individuals still need to be on our waiting list, they do not need to be resident within the London Borough of Sutton.

5.3.2 This scheme is managed by Stoll; they have assured SHS that they would provide all support necessary for the clients that we house and that they verify the needs and any associated risks of the individuals.

5.4 *Hardship grounds*

5.4.1 There may be some applicants that will face undue hardship if they are unable to access accommodation within the borough, these hardship grounds include:

- the need to move to take up a confirmed offer of permanent employment and the travelling time or expense would lead to hardship
- an existing social housing resident in another local authority area who works in a permanent role in the borough and the travelling time or expense would lead to hardship
- to give or receive care or support from / to a resident in the borough, which can be evidenced and supported by a medical and / or social services professional

5.5 *Immediately available homes*

5.5.1 On very rare occasions, SHS has accommodation that can be challenging to let. In these circumstances, once the local authority has exhausted its reasonable efforts to nominate an applicant and SHS has exhausted its priority bands to seek a suitable applicant, SHS may advertise "immediately available homes" to attract applicants not already on its waiting list / transfer list. These applicants must meet ALL criteria for housing except for the local connection.

5.6 *Commercial lettings including garages and parking spaces*

5.6.1 SHS lets parts of its main office to one other organisation. This letting is on a commercial basis and outside the scope of this policy.

5.6.2 SHS lets a flat at Cloverdale Court, Wallington to the local authority for use by the care provider on site. We also let a 3 bedroomed flat at Cloverdale Court (former

Scheme Manager's flat) on a non- social housing let; both of these are outside the scope of this policy.

- 5.6.3 Residents with garages or allocated parking pay separately for the use of these facilities and do not form part of their tenancy agreement. Garages and parking spaces are subject to separate weekly license agreements and therefore outside the scope of this policy.

## **6 Tenancy agreements**

- 6.1 SHS will grant all nominations from the local authority when accepted for housing and most SHS waiting list applicants an assured tenancy. For the Veteran's Nomination Scheme, the first year of the tenancy will be an assured shorthold tenancy; assuming the tenancy is conducted satisfactorily, an assured tenancy will be offered. For homeowners offered housing by SHS, they will be granted an assured shorthold tenancy for 12 months (see below).

### *6.2 Homeowners*

- 6.2.1 For homeowners offered housing by SHS, they will be granted an assured shorthold tenancy for 12 months. Within 9 months of the tenancy being granted, proof of the sale of the home must be provided. If proof is not provided as the home has not been sold, the CHM will review the situation with the OD. It is likely that a renewal of the assured shorthold tenancy is given although there is the potential for SHS to instigate possession proceedings. Should possession proceedings be the way forward, this must be recommended by the OD and approved by the Chief Executive.

### *6.3 Rent and Service Charges*

- 6.3.1 SHS will generally review the rent and service charges in line with the tenancy agreement, usually at the beginning of April each year. The rent would usually increase or decrease, with service charges fluctuating to reflect actual costs.
- 6.3.2 SHS increases the rent for all new lettings by an agreed percentage each year. SHS rents for non- commercial lettings are social or affordable rents. SHS expects all residents to pay their rent in advance and to make a payment of two weeks rent in advance at the tenancy sign up meeting.

## **7 Reciprocal arrangements**

- 7.1 SHS may enter a reciprocal arrangement with another social landlord or with the local authority to re-house a resident of SHS on the understanding that a resident of that landlord will be re-housed by SHS. This will be subject to a recommendation by the CHM and approval by the OD.



## 8 Vetting all new applicants and nominees

- 8.1 The system in place for vetting applicants and nominees to ensure that there is a right to reside, no history of rent arrears, anti-social behaviour or criminal activity, will be carried out through the completion of the housing application form. Photographic ID evidence will be required for all applicants. However, nominees received from the local authority are checked and verified by the Council's contractor who manage the Council's Housing Register. This includes right to rent checks and affordability.
- 8.2 For nominations to any of our older people schemes, the CHO will check suitability for housing at a viewing. For nominations to our housing with care scheme, we will check the social worker referral and the proposed support plan for suitability. For our direct lets, checks for suitability are made at the registration interview and / or the transfer home visit.

## 9 Matching household and property size

- 9.1 SHS will complete a nomination request document for the local authority defining our empty home attributes, including the type of accommodation, size, adaptations, facilities etc. The local authority nominees will be accepted for accommodation of a size which matches their current needs, and in line with their housing needs as deemed appropriate by the local authority.
- 9.2 Applicants to the SHS waiting list will be considered only for accommodation whose size matches their current and near-future housing needs. An adult member of a household who is not part of a couple will not be expected to share a bedroom (for example, a carer).

Household size	Property size (4 bed max)
Single person	Room, bedsit / studio, 1 bed
Couple	1 double
Single person with carer	1 double & 1 single
Couple with carer	1 double & 1 single

- 9.3 For residents moving by way of a mutual exchange, they are entitled to one extra bedroom over and above what would usually be permissible. However, these residents need to be aware of any financial constraints which may apply such as the under-occupation penalty, any benefits cap, our pet policy, and the loss of the right to buy if they have this right elsewhere.

#### 9.4 *Prioritisation of applicants*

9.4.1 Prioritisation of local authority nominations will be carried out by the local authority through their Choice Based Lettings system. Prioritisation for direct lets from our waiting list and for our transferring residents will be via letting bands as outlined below.

### **10 Lettings bands**

10.1 As part of an application to join our waiting list or for current residents wishing to transfer to one of our older people schemes, we will assign a lettings band based on the assessed housing need. When allocating an empty home, there is no bias to a transferring resident or a direct applicant on our waiting list.

10.2 Priority is based upon banding (Urgent, Priority or Routine.) For any allocation, priority will be granted to 'Urgent' applicants over 'Priority' applicants who in turn are prioritised over 'Routine' applicants.

10.3 Within the three bands applicants are shortlisted by the chronological date they were approved at their current banding.

10.4 For applicants who have declined a certain scheme and / or who specifically require a certain floor level or bathroom type, they will not be shortlisted if their personal choice does not match the empty home to be let. The banding priority criteria for applicants who are either direct waiting list applicants or transferring applicants is explained below.

10.5 Applicants / transferring residents must inform SHS when their circumstances change, when the banding may be reviewed at that point or when the application is reviewed on an (at least) annual basis.

#### **10.6 Direct lets bands**

##### ***Urgent***

The urgent band includes the following circumstances:

- Anti-Social-Behaviour (ASB) / harassment (including racial harassment): SHS will try to help victims of ASB or harassment where there is supporting evidence from other agencies involved in the investigation
- Homelessness / pending homelessness (evidence must be supplied): Please note that the local authority has a statutory duty toward people who are homeless or facing homelessness. Evidence will be required from the applicant's local authority or contractor who have assessed and concluded a duty to house
- Serious medical need: The applicant's current housing circumstances are seriously detrimental to their condition and the applicant cannot reasonably continue to live at the property (i.e. they have become a wheelchair user and are currently on the 2<sup>nd</sup> floor with no lift and therefore cannot leave the property)

### ***Priority***

The priority band includes the following circumstances:

- Medical need: The applicant's housing circumstances are adversely affecting their condition or causing serious difficulties, and whose condition will be improved by a move
- Financial circumstances: The applicant's financial situation is adversely affecting their current housing circumstances. They can no longer keep up mortgage or private rented payments, through no fault of their own
- Under-occupation: Where someone lives in a property that is larger than they need, by one bedroom or more and they are willing to move to a smaller property
- Loneliness and isolation: Applicants feel insecure and lonely due to their environment. Applicants would benefit from the facilities available to them in our older people's accommodation. This must be supported by a GP, social worker and / or support worker
- Veterans nomination scheme: Applications received under these schemes will be considered a priority

### ***Routine***

This will include any applicant wishing to register for a move, but who does not qualify for the other two bands. Once in this band, applicants are reviewed in date order. This band may include applicants for our homes that are immediately available.

## **10.7 Transferring residents' bands (internal transfers)**

### ***Urgent***

The urgent band includes the following circumstances:

- Decants (management transfer): This priority is given when an internal move is needed urgently due to unforeseen circumstances e.g. a flood from the flat above rendering the property uninhabitable. This also applies when an SHS resident will need to move out in the next 12 months for major repairs / remodelling as the work cannot take place with the resident in occupation
- Anti-Social-Behaviour (ASB) / harassment: SHS will try to help victims of ASB or harassment where the Community Housing Officer's case is supported by the Community Housing Manager. In most cases we will require evidence from other agencies who are investigating the ASB or supporting the victim(s) of the ASB
- Serious medical need: The resident's current housing circumstances are seriously detrimental to their condition and they cannot reasonably continue to

live at the property (i.e. they have become a wheelchair user and are currently on the 2<sup>nd</sup> floor with no lift and therefore cannot leave the property)

### ***Priority***

The priority band includes the following circumstances:

- Medical need: The resident's housing circumstances are adversely affecting their condition or causing serious difficulties, and whose condition will be improved by a move
- Under-occupation: Where someone lives in an SHS property that is larger than they need, by one bedroom or more and they are willing to move to a smaller property
- Loneliness and isolation: Applicants feel insecure and lonely due to their environment. Applicants would benefit from the facilities available to them in our older people's accommodation. This must be supported by a GP, social worker and / or support worker

### ***Routine***

This will include any applicant wishing to register for a move, but who does not qualify for the other two bands. Once in this band, applicants are reviewed in date order.

## **10.8 Approval of banding and acceptance to the waiting list and transfer list**

- 10.8.1 The banding of an applicant wishing to join the waiting list will be assessed by the Community Housing Assistant (CHA) with the approval of a CHO. Where a decision cannot be reached, it will be referred to the CHM or in their absence, the OD. All supporting evidence will be summarised in a report for the OD, when necessary, to aid the decision.
- 10.8.2 The banding of a transferring applicant will be assessed by the Community Housing Officer with the approval of the CHM. Where a decision cannot be reached, it will be referred to the OD. All supporting evidence will be summarised in a report for the OD, when necessary, to aid the decision.
- 10.8.3 No allocation will take place without the approval of the CHM (or in their absence the OD).
- 10.8.4 Any allocation to a SHS staff or Board Member must be approved by the Chief Executive.

## **11 Review of the waiting list / transfer list**

- 11.1 A review of each applicant will take place in April each year and when individual circumstances change for all applicants / transferring residents. This will apply to everyone who has been on the waiting list for a period of 8 months or more since their initial acceptance.

11.2 If an applicant / transferring resident does not respond to the review after two attempts, they will be removed from the waiting list / transfer list and advised of this in writing.

## **12 Offers and refusals of accommodation**

### *12.1 Local authority nominations*

Local authority nominees will be offered a viewing for the property for which they have been nominated. As the local authority operates a Choice Based Lettings system, it is likely that the viewing will be with more than one applicant, multiple viewings to be held with no more than 2 applicants at a time. The applicant will be sent an SHS nomination application form to complete and to bring with them to the viewing.

The applicant will be advised by SHS to bring photographic ID to the viewing; the rent and other charges will be discussed at the viewing. The viewing will not proceed if this cannot be provided. If this situation occurs, SHS reserves the right to move onto the next nominee (who under multiple viewings will be present).

An offer of accommodation will follow the viewing, or as soon as possible after the viewing, unless it is discovered the information regarding their existing housing conditions is incorrect, there is a concern relating to any risk assessment and / or there are other exceptional circumstances.

SHS reserves the right to undertake its own investigation, reference and risk assessment and to refuse nominees if there is evidence to suggest that the applicant would be unsuitable. Such a refusal would be supported by appropriate evidence and endorsed by the CHM. The matter will be brought to the local authority's attention before the nomination is refused; the local authority is responsible for informing the applicant.

If the nominee refuses the property, they will be referred to the local authority and the next nominee under the Choice Based Lettings system will be offered the property. Any local authority nominees have no right of appeal to SHS. The CHO will log the reason for refusal for SHS' monitoring purposes.

All rejected applicants will be advised to discuss their situation with the agent managing their application at the local authority.

### *12.2 SHS direct lettings*

12.2.1 Applicants will be able to exercise choice over which area/scheme and what floor level they would accept. On occasions applicants may be offered a property which does not meet their specified choices as stated. Refusal of such an offer will not be deemed to have been suitable and will be reviewed by the CHM.

#### 12.2.2 *Waiting list:*

Waiting list applicants will be made two reasonable offers. If they refuse two offers of suitable accommodation, their application will be suspended for one year. The CHO will log the reason for refusal for SHS' monitoring purposes.

There is a right to appeal this decision if an appeal is made within 10 working days of the date of the letter. All rejected applicants will be referred to housing advice agencies.

#### 12.2.3 *SHS Transfers:*

All SHS transferring residents will be made two reasonable offers. If these two reasonable offers are refused, their application will be suspended for one year. The CHO will log the reason for refusal for SHS' monitoring purposes.

There is a right to appeal this decision if an appeal is made within 10 working days of the date of the letter.

#### 12.3 *SHS decants:*

Residents in need of a decant will be made two reasonable offers. If they refuse these two reasonable offers, SHS reserves the right to take legal action to require the resident to move. The CHO will log the reason for refusal for SHS' monitoring purposes.

### **13 SHS lettable standard**

13.1 All properties let (apart from homes let via a mutual exchange, succession arrangement or urgent decant and management moves) will meet SHS' published lettable standard; this covers both internal and external spaces.

#### 13.2 *Mutual Exchanges, successions, urgent moves*

Properties let through a mutual exchange, succession or an urgent move scheme will be let in the same condition they were left by the previous occupant. SHS will ensure all mandatory checks are carried out before the resident moves in (if not already in occupation).

Any repairs required will be carried out under SHS repairs policy and landlord obligations.

### **14 Appeal**

14.1 All applicants other than those nominated by the local authority or who form part of our exceptions criteria, have the right to appeal if they believe that any offer of accommodation was unsuitable, they were refused access to the SHS waiting list or they were removed from the waiting list following a review.

14.2 This appeal will be responded to by the CHM (or where a decision has been made by the CHM, the OD).

- 14.3 Any appeal must be made in writing within 10 days of the refusal of the offer. The appellant must clearly state the reasons for the appeal and what decision they wish to be made.
- 14.4 The CHM / OD will review the appeal and any additional information before making a decision. The CHM or a member of the team may speak to the appellant to clarify any outstanding queries before making a final decision.
- 14.5 The CHM / OD will notify the applicant in writing within 10 working days of receipt of an appeal as to the outcome of the appeal. In the exceptional case where the OD cannot determine an outcome of an appeal, then the appeal will be brought to the Chief Executive.
- 14.6 If an appeal is based on an unsuitable offer, the said property will not be held over for the duration of the appeal. Where an appellant is successful in their appeal, they will be offered the first available property of the same nature if their needs have remained the same.
- 14.7 For all other appeals, the property offered will be placed "on hold" until the outcome of the appeal is known.
- 14.8 If a decision is within the basic policy (e.g. the applicant does not meet the eligibility criteria) there will be no further appeal process.

## **15 Confidentiality and GDPR**

- 15.1 If an applicant either refuses offers of accommodation or is not re-housed by SHS, the application form and additional material will be destroyed within 12 months of the application being made by the CHA, in line with our document retention policy.

## **16 Monitoring and reporting**

- 16.1 Lettings performance is reported monthly to the all staff performance meeting and quarterly to both the Board and to the Housing Operations Committee (HOC). More detailed information relating to refusals, trends, nominations etc is reviewed annually from April 2021 and reported to the Board and to the HOC at their next meeting.
- 16.2 SHS is required to complete and submit a CORE (Continuous Recording of Lettings) form as part of the regulatory requirements. Data contained within the CORE form will be recorded and reviewed annually and, where necessary reported to Board in the annual review of lettings.
- 16.3 SHS completes and submits quarterly returns to the Local Authority including all letting activity through nomination, direct lets, transfers, mutual exchanges, succession, assignment, decant etc.

16.4 Performance indicators measured include:

- Reasons for empty homes arising
- The average time it takes from a property becoming empty to being allocated
- Reasons for refusals of properties
- Number of appeals received
- Resident satisfaction with new lettings
- Access to SHS homes summary e.g. number of successful nominations from the local authority, number of direct lets, number of transfers
- The number of sensitive / management lets
- Number of applicants / residents registered for transfers, within each band
- Number and percentage of applications and lettings by BME groups
- Complaints made regarding lettings

## **17 Equality, diversity and inclusion**

17.1 SHS recognise that residents of all races, ages, religions, gender, sexual orientation, literacy levels and disability should be treated equally and fairly and we will not discriminate in implementing this policy and procedure.

17.2 SHS will be sensitive to residents' individual needs and will tailor our services and approaches accordingly.

17.3 SHS advertises its older people's housing stock so that referrals and nominations are made that reflect the diverse population mix of the local borough. We also advertise our waiting list on our website .

17.4 All residents / applicants have access to this document upon request and it is available on our website.

17.5 Equality, diversity and inclusion training is mandatory for all SHS staff.

## **18 Risk**

18.1 We have identified the following risks associated with the implementation of our Lettings policy:

- Loss of rent income if we fail to let homes efficiently
- Increase in failed tenancies if inappropriate lettings are made
- We are subject to a fine if we do not follow the right to rent guidance for direct lettings
- Housing an inappropriate person if adequate checks are not carried out
- Poor partnership working with the local authority if we fail to engage appropriately with them
- Poor customer satisfaction if we do not meet our lettable standard



- Reputational risk if we are, or perceived to be, failing to let our homes in a fair and transparent manner
- Tenancy fraud

## **19 Policy review**

- 19.1 This policy will be reviewed on a 3-yearly basis and when there are significant changes in legislation and / or our approach.