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**Authorised by:** Sanctuary Scotland Management Committee

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## **1. Policy statement**

- 1.1 This Lettings Policy sets out the standards and general guidance which we will follow to ensure that our properties are allocated to those most in need of them.

## **2. Aims & purpose of this policy**

- 2.1 Our primary aim is to provide affordable and well managed rented accommodation to those in housing need, and at the same time contribute to providing balanced and sustainable communities. We aim to achieve this by pursuing the following objectives:

- Allocating homes to people with high levels of housing need
- Ensuring that access to the allocations process is open at all times to all sections of the community
- Making the best use of available stock and using the allocations process to assist in the creation and maintenance of balanced, and sustainable communities.
- Establishing comprehensive and clear targets for the allocation of properties;
- Ensuring that allocations can be readily monitored through current information systems by staff;
- That staff process applications efficiently and effectively whilst ensuring confidentiality and access to information will be in line with legal requirements.

- 2.2 The lettings service will play a vital role in delivering the priorities set out in the Sanctuary in Scotland Operations Plan, including specifically:

- providing excellent services, making sure the needs and ambitions of all our tenants and potential customers are understood;
- increasing income as far as possible by managing debts and empty properties effectively;

- 2.3 We recognise and value diversity in the delivery of our lettings service. Our equality scheme 'Fairness for All' sets out a key objective which is to 'Ensure customers have fair access to the services they need.' We consider the lettings service to be a key driver in ensuring we meet this objective.

## **3. Access to our housing**

- 3.1 There are a number of ways of gaining access to the Association's properties depending on local circumstances. These are listed below and applicants can only gain access to our housing through one or more of these routes:-

- Our Housing List
- Common Housing Registers, where in operation
- Local Authority Nominations
- Nominations from referral agencies approved by the Committee

- Special Needs move on targets approved by the Committee
- Existing tenants wishing to transfer
- Mutual Exchanges
- Reciprocal arrangements with other organisations

3.2 We will accept applications from any applicant over the age of 16 years regardless of race, colour, ethnic or national origin, gender, sexual orientation, marital status, HIV status, religion, physical or learning disability, home ownership, income or financial circumstances.

3.3 The Association has only a small number of houses available for allocation each year, so we cannot guarantee being able to offer a house to everyone accepted on to our list. We will actively encourage applicants to apply for housing with other Housing Associations and Local Authorities, for example through Common Housing Registers. Even if the circumstances of an applicant merit a high priority, we cannot guarantee a house will become available within a reasonable timescale.

3.4 Applicants applying to the Association for housing come from a variety of different housing circumstances and this policy seeks to ensure that a balance of applicants from a range of circumstances are given the opportunity to be housed.

#### **4. Local Lettings Plans**

4.1 To ensure the best use of our stock, and in meeting the needs of applicants and the local communities, Sanctuary Scotland operates Local Lettings Plans, which are reviewed at least on an annual basis by the Management Committee, or any Sub Committee to which this function has been delegated.

4.2 Each Local Lettings Plan will set out the expected number of properties for letting during the coming year and set targets based on local population and mix. Additionally, annual Lettings Targets are set for each Housing List Band and Local Authority Nominations. Local Authority partners must be consulted with regard to Local Lettings Plans particularly in relation to nominations targets.

4.3 Where possible we will also use Lettings Plans to monitor the proportion of lets to people with protected characteristics, such as ethnic minorities and disabled people, to demonstrate that allocations are made equitably and without discrimination.

4.3 The performance of the Association in meeting the targets set will be reported regularly to the Management Committee or any Sub Committee to which this function has been delegated.

#### **5. Banding**

5.1 We operate a banding system to assess whether applicants have a sufficient housing need to be considered for rehousing or a transfer. Applicants will be placed on our housing list in the appropriate band in accordance with housing need and date of

registration. Details of the banding system we use to award priority for different needs are shown in Section 12 below.

- 5.2 The percentage of lettings to be made to applicants from each band will be determined by Local Letting Plans to ensure reasonable preference is given to those in greatest housing need.

## **6. Non standard selections**

- 6.1 The Association may from time to time depart from the standard selection process to assist in the maintenance or development of balanced communities or make best use of the stock. Any applicant bypassed would normally be offered housing in the near future. The decision to bypass applicants must be sanctioned by the Housing Manager and a clear audit trail provided.

- 6.2 Existing tenants may be transferred due to exceptional circumstances using a management transfer, even though they do not have high enough priority to be considered for the house they are allocated. Such transfers will be kept to a minimum, authorised by two people in the position of Housing Manager or above, and a clear audit trail will be kept. Use of management transfers will be monitored through Local Lettings Plans.

- 6.3 We may make a decision that an applicant would be unable to sustain a tenancy, and offer to consider them for supported accommodation, rather than rehousing through the normal route.

## **7. Information for applicants**

- 7.1 Where possible we will try to provide applicants with an estimate of the likely waiting time for their choice of property. This will be based on recent turnover of property and demand in their area(s) of choice.

## **8. Suspensions**

- 8.1 We will consider suspending applicants for the following reasons:
- Where the applicant has rent arrears or any other debts attributed to a current or previous tenancy;
  - Where the applicant has perpetrated antisocial or criminal behaviour or breached their tenancy conditions;
  - Where the applicant has provided false or misleading information or withheld relevant information;
  - Where the applicant has intentionally worsened their own circumstances to promote their application for housing;
  - Where the applicant is not eligible for assistance e.g. an asylum seeker

### Arrears and other tenancy related debts

- 8.2 Where a tenant or applicant owes more than one twelfth of the annual amount payable in relation to a current or former tenancy, their application will be suspended from the active housing list unless there is an appropriate arrangement to pay outstanding debts and this arrangement has been maintained for the previous 3 months. The Housing Manager has the discretion to approve an offer of housing to an applicant who does not meet these conditions where there are extenuating circumstances.
- 8.3 If the applicant was the member of a household but not the tenant we will not take into account tenancy related debt for the purposes of assessing their application. We will not take account of any arrears which are equal to or less than one twelfth of the annual amount payable for any tenancy the applicant held.
- 8.4 Where tenancy debts are over 5 years old, applicants will not be suspended.

### Anti-social behaviour

- 8.5 Applicants will only be suspended for anti-social behaviour which is serious, and which is tenancy related e.g. a breach of tenancy agreement. When deciding if any anti-social behaviour is serious enough to merit suspension, we will take into account the criteria for eviction set out in the section 16(3) of the Housing (Scotland) 2001 Act.
- 8.6 Where applicants have caused serious anti-social behaviour problems within the previous three years, or terminated or abandoned a Sanctuary Scotland Housing Association tenancy or other Landlord's tenancy where they were responsible for wilful damage we will consider the use of other options such as granting a Short Scottish Secure Tenancy.

### Managing suspensions

- 8.7 We will normally suspend any applicant, or the current spouse or partner of the applicant, for at least one year for the following reasons:
- Provided false or misleading information or withheld relevant information, or
  - Intentionally worsened their own circumstances to promote their application for housing
- 8.8 These issues will be the subject of a regular review process. However, applicants may appeal in writing against a decision to refuse access or suspend them to the Senior Officer within 15 working days. If the applicant is not satisfied with the outcome of the appeal, the next stage to follow is the Association's complaints handling procedure. We will inform any applicant in writing if we suspend their

application and we will provide full reasons for any such decision, outlining the steps they need to take to remove the suspension.

## **9. Nominations and referrals**

- 9.1 We will seek to enter into formal partnership arrangements with the local authorities in every area which we operate.
- 9.2 The partnership arrangements will set out nomination agreements between the two bodies and the basis on which we will assist the local authority in meeting housing needs and its statutory homelessness duties.
- 9.3 Partnership arrangements will normally allow the Council to either nominate, or accept through section 5 referrals, 50% of all local lets (after transfers, mutual exchanges, management transfers and decants). Nomination agreements may in exceptional circumstances be up to 100% in some areas where this is a contractual requirement.
- 9.4 We will aim to work with local partners in the development of common housing registers where practical. Where common housing registers are in operation we may discontinue arrangements for nominations and section 5 referrals, where we are satisfied that the common housing register allows us to adequately assist in meeting statutory homelessness duties.
- 9.5 We will provide both temporary and permanent accommodation for homeless people upon the request of the local authority as part of its duty to secure permanent accommodation under the homelessness legislation.
- 9.6 Any dispute arising from the operation of these arrangements will be resolved either through the dispute process agreed with each of the local authorities or through the use of an Arbiter.
- 9.7 We may also agree referral arrangements with voluntary or other agencies that specialise in providing support to particular groups of people. Such arrangements will be identified within our Local Lettings Plans.

## **10. Access Apna Ghar**

- 10.1 Access Apna Ghar Housing Association is a subsidiary of Sanctuary Scotland Housing Association. The organisation is focused on meeting the needs of people from black and minority ethnic communities.
- 10.2 Access Apna Ghar Housing Association, or any successor body, organisation or group dealing with its remit / function will support Sanctuary Scotland HA by identifying appropriate areas in which to develop or acquire properties that can be used to house people from black and ethnic minority communities. In order to aid

community cohesion, these will generally be located in high amenity, mixed tenure areas but outwith the core areas of traditional BME settlement.

- 10.3 Where possible, accessible (ambulant disabled) accommodation will be procured and 3-bedroom properties in particular will be sought. The Association will grant referral rights to AAGHA over any properties acquired or developed specifically for this purpose.
- 10.4 Access Apna Ghar Housing Association will invite referrals for lets from a range of other agencies, including local authorities (Refugee Support Teams), Positive Action In Housing, Scottish Refugee Council, Glasgow Centre for Inclusive Living, Shelter, Hemat Gryfe Woman's Aid, Ethnic Enable and other RSLs which have minority ethnic applicants on waiting lists/specific BME projects.
- 10.4 The selection of applicants for particular properties will be made based on an assessment of need according to the reasonable preference categories outlined in the Housing (Scotland) Act 1987 (as amended). These reasonable preference categories are as follows:
- people who are occupying houses which do not meet the tolerable standard
  - people who are occupying overcrowded houses
  - people who have large families
  - people who are living under unsatisfactory housing conditions
  - homeless people and people threatened with homelessness
- 10.5 This assessment of need will be carried out on a cumulative basis with the intention of achieving the best 'fit' of applicant, to the particular property available. For example, an applicant in more than one of the statutory need categories is likely to be given preference over an applicant in just one of the statutory need categories. The time an applicant has been waiting will not normally be a factor in the selection of applicants. A list of relevant housing factors to be considered will be held for each applicant for which a referral is received, along with the date of referral.
- 10.6 Initial selection of an applicant will be made by a Housing Officer, who will record reasons for this selection. The decision will then be subject to approval by an Allocations Panel, which will include representation from the Director of Access Apna Ghar and at least one member of the Sanctuary Scotland Housing Association Senior Management Team. An audit trail of each selection process will be maintained.
- 10.7 The Director of Sanctuary Scotland will commission or carry out an audit of a sample of allocations carried out in each year. The size of the sample will be determined by the number of lets carried out in the year. Details of any such audit will be presented to the Management Committee of Access Apna Ghar Housing Association and be available to the Management Committee of the Association if requested.

## 11. House types and sizes to be allocated

- 11.1 The Association will generally attempt to allocate houses of the type expressed as a preference given on the application form. Where a medical priority recommendations that a ground floor house all on one level is required, properties with some stairs may be allocated if this would alleviate the applicant's situation, and is in line with any guidance from a local Medical Adviser.

### General guide to house size

- 11.2 The following table is a general guide to the minimum size of houses which may be offered to applicants. Applicants may also request properties which have one bedroom more than the minimum required.

Household	Minimum Size
Single person	1 bedroom
Couple	1 bedroom
Single parent or couple + 1 child	2 bedroom
Single parent or couple + 2 children	2 or 3 bedroom*
Single parent or couple + 3 children	3 or 4 bedroom*
Single parent or couple + 4 children	3 ,4 or 5 bedroom*
Single parent or couple + 5 or more children	4, 5 or 6 bedroom*

\* **Depending on ages and sexes of children**

### Sharing bedrooms

- 11.3 The minimum number of bedrooms that are required by a household with children will be based on the following:
- ❖ Children of the same/opposite sex under age 8 will normally be allocated 1 bedroom to share.
  - ❖ Children of opposite sexes age 8 or over will normally be allocated 1 bedroom each.
  - ❖ Children of same sex age 8 or over and under the age of 16 will normally be allocated 1 bedroom to share .
  - ❖ Children of the same sex, with a minimum of 8 years age gap between them will normally be allocated 1 bedroom each
  - ❖ Once a child reaches the age of 16, he or she will be classed as an adult and will be allocated a separate bedroom.
- 11.4 All the above are restricted to a maximum of 2 persons sharing a bedroom, with parent(s) having a separate bedroom from their children. We will not normally allow an applicant to move into a property in which they would have two or more bedrooms over and above the minimum size requirements for eligibility for full housing benefit / universal credit (see also Section 11.7 on access).

11.5 Where a member of the applicant’s household is pregnant, the unborn child will be counted in household size calculations from 2 months before the birth of the child.

**Overcrowding priority**

11.6 Any household currently living in conditions where they do not meet the minimum standards set out above will be given overcrowding priority (see also Section 12). Applicants will also given overcrowding priority where they do meet these minimum standards, but two or more members of the same household are required to share a single bedroom.

**Access**

11.7 Where separated parents both have access to children, the children are counted as part of each household where children are resident with one parent for 3 or more nights. Separated parents with access only will be entitled to a property with only one bedroom extra, over and above the minimum bedroom requirement the household would have without the children they have access to. Evidence is required from the applicant that they do have access, such as confirmation from the partner with full access or confirmation from a solicitor.

**Lettings areas**

11.8 The Association’s housing stock will be divided into logical lettings areas. There will be no limit to the number of lettings areas within which applicants can request to be rehoused.

**12. The banding system**

12.1 Applications made direct to the Association will be placed in one of the following four bands following an assessment of the applicant’s circumstances and housing needs. Within bands, applicants will be prioritised based on their dates of application or on their dates of being placed in a new band following a change of circumstances.

**Band 1: Urgent Priority**

12.2 The following criteria are awarded Urgent Priority banding:

<b>Domestic abuse</b>	Where the applicant needs accommodation due to domestic abuse. <i>Confirmation may be requested with the applicants’ consent from relevant agencies such as the Police, Health Professional, Social Work, Women’s Aid, etc. However, verification of domestic abuse from other agencies is not a condition required for an applicant to be given priority.</i>
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<p><b>Harassment / racial harassment / homophobia</b></p>	<p>Where the applicant is suffering serious harassment at their current accommodation and being rehoused will help to alleviate this.</p> <p>Harassment can take many forms including intimidating, threatening or aggressive behaviour, both verbal and physical, and can involve attacks on property as well as people. Incidents of harassment can include sexual comments or gestures, offensive or racist graffiti, abusive language and behaviour, violence towards people of all ages, damage to homes or possessions and threatening letters or phone calls. Harassment is often premeditated and reoccurring. <i>Confirmation may be requested with the applicants' consent, either from agencies such as the Police, Social Services and Health Organisations or from other witnesses which can include staff. Where appropriate, confirmation can also be provided by the customer's advocates, i.e. local councillors, Members of Parliament, Members of the Scottish Parliament, advice workers and from voluntary organisations. However, verification of harassment from other agencies is not a condition required for an applicant to be given the appropriate priority.</i></p>
<p><b>Severe under occupation</b></p>	<p>Sanctuary Group tenants who are living in houses with 2 or more bedrooms over and above the minimum requirement for their present needs. <i>The household or circumstances (including financial circumstances such as a change in housing benefit regulations, or a household member losing employment) of the applicant must have changed since they accepted the tenancy of their current accommodation before they can be eligible for under occupation priority.</i></p>
<p><b>Urgent health / disability</b></p>	<p>Where the applicant's existing property is so unsuitable that re-housing would significantly result in an improvement in health or wellbeing. <i>Applicants requiring re-housing on medical grounds will be assessed by an independent Medical Advisor if this service is available. Where this service is not available, an assessment will be made by in house staff based on details provided by applicants on their medical condition and current housing situation.</i></p>

<b>Inappropriate accommodation</b>	Where a Sanctuary Scotland Housing Association tenant no longer needs an adapted property or support provided with the accommodation.
<b>Move on</b>	Where an applicant or tenant occupying supported housing no longer requires this service. <i>Confirmation is required from the supported housing provider/agency.</i>
<b>Management transfer</b>	Where there are <b>exceptional circumstances</b> , and the need for a transfer applicant to be moved as soon as possible is both acute and urgent and is authorised by appropriate senior staff (see Section 6.2)

**Band 2: High Priority**

12.3 The following criteria are awarded High Priority Banding

<b>Medical</b>	Where the applicant has a medical condition which will be alleviated by re-housing. <i>Applicants requiring re-housing on medical grounds will be assessed by an independent Medical Advisor if this service is available. Where this service is not available, an assessment will be made by in house staff based on details provided by applicants on their medical condition and current housing situation.</i>
<b>Giving and receiving support</b>	Where an applicant needs to move to either give or receive support i.e. for personal or medical care. <i>The Medical Advisor will award a medical priority for re-housing for applicants requiring or providing support. Where this service is not available, an assessment will be made by in house staff based on details provided by applicants on their medical condition and current housing situation.</i>
<b>Overcrowding</b>	Where the applicant's current accommodation is overcrowded when assessed against criteria set out at 11.6.
<b>Under occupation</b>	Sanctuary tenants who are living in houses with bedroom over and above the minimum requirement for their present needs. <i>The household or circumstances of the applicant must have changed since they accepted the tenancy of their current accommodation before they</i>

	<i>can be eligible for under occupation priority.</i>
<b>Shared facilities</b>	Where applicants share facilities with others who are not part of the current household (e.g. living with parents/relatives, living with a former spouse/partner following a relationship breakdown, living in hostel/bed and breakfast type accommodation).
<b>Repeated victim of antisocial behaviour</b>	Where the applicant is suffering from current and serious antisocial behaviour which will be alleviated by moving house. <i>Requires supporting evidence e.g. from the police, health professional, social worker or housing officer.</i>
<b>Poor quality property in terms of condition / disrepair</b>	Where the existing property of the applicant is unsafe or unfit and falls into the following categories <ul style="list-style-type: none"> <li>❖ Serious structural defects</li> <li>❖ No running water</li> <li>❖ No inside toilet</li> <li>❖ No bath or shower</li> <li>❖ Damp</li> <li>❖ No full central heating.</li> </ul> <p><i>Requires documented evidence from Environmental Health or another relevant agency</i></p>
<b>Non secure accommodation</b>	Applicants who have been assessed as unintentionally homeless or threatened with homelessness by a local authority. <i>Requires a copy of a decision letter from the local authority.</i>

**Band 3: Medium Priority**

12.4 Transfer applications (applications from existing tenants of the Association to move to another property) will generally be awarded Medium Priority banding. However, transfer cases that meet the higher priority bandings criteria are placed in the relevant higher priority bands.

**Band 4: Standard Priority**

12.5 All other applicants who satisfy the eligibility criteria will be awarded a Standard Priority banding.

### **Nominations / Statutory Homeless Band**

- 12.6 Persons nominated or referred by Local Authorities will be placed in this band.
- 12.7 Designated staff must ensure that customers who have made an application based on homelessness are guided to the appropriate Local Authority Homelessness Unit/Department who are responsible for assessing homeless applications.

### **Sheltered Housing**

- 12.8 Applicants who are 60 years or over requesting sheltered housing will be placed in the appropriate band following an assessment by the Medical Advisor. Where this service is not available a relevant health professional will be required to provide information to support the application.
- 12.9 Sheltered Housing Banding will range from -
- |               |   |
|---------------|---|
| Urgent Band A | Priority (urgent medical or social need for sheltered housing)    |
| High Band B   | Priority (high medical or social need for sheltered housing)      |
| Standard C    | Priority (standard medical or social need for sheltered housing). |
- 12.10 The award will depend on the needs of the applicant.
- 12.11 It is important to have a mix of residents with different support needs in the sheltered housing schemes. Local lettings plans will be used to set quotas for lets to different bands each year in order to achieve this balance.

### **Special Needs Housing**

- 12.11 Applicants requiring specially adapted housing will be referred by the Special Needs Group where this operates within the local authorities. In these areas all applicants will be assessed by these specialist panels to determine the degree of housing need. Where this service is not available information will be required from relevant Social Work or Health Professional.
- 12.12 We will also try to pre-allocate all new housing specially adapted for wheelchair users at the development stage to allow us to design accommodation to suit individual needs in consultation with the applicant and other relevant professionals.
- 12.13 Where a vacant property has special features or adaptations which would make it suitable for occupation by a person with disabilities or particular needs then the normal allocations processes may be bypassed to ensure that the property is allocated to an applicant or family who would benefit from the features available. The allocation of such properties may be made in consultation with the Social Work Department, Health Board/Care Trust or other relevant agency.

### **13. Responding to applications**

- 13.1 The Association will aim to respond to all applicants within 15 working days of receipt of application advising them of the outcome of their application and whether or not any additional information in support of the application is required.
- 13.2 Applicants will be advised of the likely availability of housing that suits their needs and an indication of timescales will be provided if possible. Those who are asked for further supporting information will be given 15 working days to provide it. The Association reserves the right not to process the application if the necessary information is not provided, or if no suitable response is received within that timescale.

### **14. Making, receiving, accepting and refusing an offer of housing**

- 14.1 Applicants will be given 3 working days from the date of an offer letter to respond either by refusing the offer, or by making an arrangement to view the property. Failure to do so will result in the offer being withdrawn in writing by the Association and recorded as a refusal.
- 14.2 An applicant must normally accept an offer and sign the Tenancy Agreement within 1 working day of viewing the property, although this may be extended by a further working day in special circumstances. Failure to do so will result in the offer being withdrawn and recorded as a refusal.
- 14.3 The Association does appreciate that applicants may wish to view and sign for a property the same day and in exceptional circumstances staff will facilitate this request when required.

### **15. Confirmation of circumstances**

- 15.1 The onus of proof of circumstances lies with the applicant in most circumstances. Applicants unable to provide adequate evidence as to their housing needs or circumstances will have their application cancelled (see section 18). Verification of domestic abuse or harassment from other agencies is not a condition required for an applicant to be given the appropriate priority.
- 15.2 Responsibility for notifying changes of address and other changes of circumstances lies with the applicant. Failure to notify changes may materially affect the banding priority the applicant is awarded.

### **16. Review of applications**

- 16.1 A review will be carried out of all those on the list on at least an annual basis. Applicants will be required to respond to a letter within 15 working days of receipt stating whether they still wish to be considered for housing, and listing any changes in circumstances. Applicants will be given a reminder and further 15 working days to

respond. Failure to do so will result in the applicant being removed from the list. Removal from the list will be confirmed in writing to the applicant. If an applicant contacts us within one month of being removed from the list, giving good reasons for not responding, they will be reinstated.

16.2 Removed applicants contacting us after one month must reapply by completing a new application form. This will be regarded as the new date of application, unless the Housing Manager considers there to be mitigating circumstances.

16.3 The review will only be required for applicants with whom there has been no contact in the previous year.

## **17. Change of circumstances**

17.1 When there is a change in circumstances for an applicant which means that the applicant will move up a band, the applicant's band date will be the date of the change in circumstances.

17.2 Where an applicant has been rehoused and wants to continue their application, we will normally re-assess their application and their band date will be the date of this re-assessment.

17.3. Where there is a change in circumstances for an applicant which means that the applicant remains at their current address but will move down a band, the applicant will normally get to keep their original band date,

## **18. Cancellation of applications**

18.1 There are a very limited number of circumstances in which we can remove an applicant from our housing list. These are:

- the applicant asks us to cancel their application;
- the death of an applicant; or
- the applicant repeatedly fails to respond to a review of the list or to other correspondence.

18.2 Any applicant whose application is cancelled or suspended will be notified in writing stating the grounds on which the decision has been made. If any applicant is aggrieved by such a decision, they have a right to appeal in writing to the Senior Officer within 15 working days of the date of notification being issued. The Senior Officer will review the case and respond within 15 working days. If the customer is not satisfied with the outcome of the appeal, the next stage is to follow the Association's complaints handling procedure.

**19. Granting of tenancies to employees, governing body members and relatives of persons connected with the association**

19.1 Housing applications from employees and relatives of persons connected with the association will be treated in line with all other applications. All applicants shall be asked to state whether or not, to their knowledge, they are related to a Committee or Staff / Agent member, and we will comply with all relevant legislation, regulatory guidance and best practice in dealing with any of these applications.

**20. High Risk Offenders**

20.1 Some offenders will require accommodation (e.g. on release from prison) and may require specialist support. As a housing association we have a duty under Multi Agency Public Protection Arrangements to work collaboratively with local authorities and other agencies. This may involve assisting with the provision of accommodation while maintaining confidentiality and ensuring that information is shared in a sensitive and lawful way.

**21. Appeals**

21.1 Applicants can appeal against the following decisions:

- A decision on an applicant's priority
- A decision to cancel an application
- A decision to suspend an application

21.2 Appeals will normally be heard by the Housing Manager. If the Housing Manager has been involved in the original decision then the appeal will be heard by another Senior Manager of Sanctuary in Scotland.

21.3 If the applicant is not satisfied with the decision made after appeal then they will be signposted to the Association's complaints handling procedure.

**22. Confidentiality**

22.1 Confidentiality regarding an applicant's personal circumstances will be respected at all times. Members of staff who are related to, or have a close connection with, any applicants will declare the fact and have no further involvement in the allocations process.

22.2 Applicants shall have the right to inspect the information on their files, subject to our legal obligations and rights to protect third parties. Upon request we will give applicants a full explanation as to how their application has been assessed.

22.3 We will ensure that applicants are informed of any changes made and that our information leaflets are updated accordingly.

## **23. Responsibilities for implementation**

23.1 The Housing Manager in each office is responsible for:

- ensuring that this policy is implemented by their staff
- ensuring that officers are designated to deal with the allocation of properties
- monitoring the systems and practices at local levels in terms of dealing with applications and allocation of properties, ensuring that there is a consistent, fair approach.
- preparing Local Letting Plans for approval by Committee.

## **24. References and sources**

- [Housing \(Scotland\) Act 2001](#)
- [Homelessness etc. \(Scotland\) Act 2003](#)
- [Data Protection Act 1998](#)
- [Equality Act 2010](#)
- Suspending Housing Applicants: A Practical Guide (CIH 2009)
- Complaints Handling Procedure - Sanctuary in Scotland (2012)
- SFHA Raising Standards.

## **25. Period of review**

26.1 This policy will be reviewed in accordance with the programme agreed by the relevant sub committee, unless:

- there are significant changes to legislation or regulation; or
- there are found to be deficiencies or failures in this policy, as a result of complaints or findings from any independent organisations.

At which point the Director of Sanctuary Scotland Housing Association will initiate an immediate review