

## THE HIGHLAND COUNCIL

Housing and Social Work Committee - 11 November 2009

Agenda Item	
Report No	

### Highland Housing Register Allocations Policy

#### Report by Director of Housing and Property

#### Summary

This report sets out proposals for changes to the Highland Housing Register Allocations Policy which is used by the Council and partners to allocate council and housing association properties across the Highlands.

#### 1. Background

- 1.1 A detailed annual allocations monitoring report was presented to Housing and Social Work Committee on 16 September 2009.
- 1.2 That report contained information on the housing needs of households seeking social housing in Highland and on the outcomes of this needs based allocations system.
- 1.3 This monitoring information showed that Highland Housing Register (HHR) had met intended policy outcomes in the first year of implementation as allocations of social housing were generally consistent with the patterns of housing need evidenced on the register.
- 1.4 The report of 16 September 2009 also identified 6 key policy areas which would benefit from clarification or amendment.
- 1.5 **Section 2** of this report outlines these 6 key areas for policy review and makes proposals for change.
- 1.6 **Section 3** of this report outlines general revisions to the Highland Housing Register Allocations Policy.
- 1.7 The changes proposed in **Section 2** and **Section 3** are incorporated in a revised draft Allocation Policy at **Appendix 1** to this report.
- 1.8 It is intended that the revised policy be implemented from April 2010 taking account of feedback from consultation with a cross section of applicants and other key stakeholders.
- 1.9 In addition the Scottish Government and the Scottish Housing Regulator will be asked to comment on the revised policy.

## 2 Proposed Policy Changes

### 2.1 Care and Support

2.1.1 Within the existing policy the Care & Support category of housing need was designed to:

- allow people in a residential or nursing or supported accommodation setting to move to independent living.
- recognise the need of a household required to move in order to provide support for someone to live independently in a community setting
- recognise the need of a household required to move to access specialist support services that are not available or accessible.

2.1.2 As a result of a changed community care environment it is recognised that there are now households in a wider range of settings with a need for independent living, for example, young people with disabilities wishing to move from the parental home, care leavers and applicants providing Kinship Care.

2.1.3 It is proposed to extend this category of housing need to include the wider range of settings and circumstances that are experienced by applicants with a need for independent living.

2.1.4 Care and Support is covered in section 5.9 of the revised HHR Allocations Policy at **Appendix 1**.

### 2.2 Local Connection

2.2.1 Local Connection is established by the “**need to reside**” in an area for reasons of employment, care, social or medical reasons as well as personal safety. Currently local connection is recognised as a housing need through the award of Local Connection points.

2.2.2 The law does not permit “length of residence” to be taken into account in the allocations process. Local Connection can however be a factor in determining the priority of applicants, although it cannot be a reason for either refusing access to the Housing Register, or as a reason not to allocate a house.

2.2.3 The annual monitoring report shows a high occurrence of local connection points across applicants and that the majority of people housed had a connection to the community in which they were housed.

2.2.4 Nonetheless it is considered appropriate to review the wording in this section of the current policy to provide greater clarity in relation to the definition of “need to reside”.

2.2.5 It is proposed to revise the wording of the policy to clarify that eligibility for local connection is for ‘applicants with an established social or family network in an area or who otherwise have a need to reside in the area for the following reasons:

- to accept or maintain employment in the area applied for, or

- to receive or provide essential care or support in the area applied for.

2.2.6 The impact of this change of wording will require to be monitored and reported through the arrangements set out in the Highland Housing Register Partnership Agreement and in the Highland Housing Register Allocations Policy.

2.2.7 Local Connection is described in section 5.10 of the revised HHR Allocations Policy at **Appendix 1**.

## 2.3 **Poor Housing Condition**

2.3.1 The annual monitoring report evidenced that the percentage of households housed with Poor Housing Condition matched the percentage of applicants on the register with this type of housing need.

2.3.2 Notwithstanding, this category of Housing Need has proved complex to implement and confusing for staff and applicants.

2.3.3 It is therefore proposed that the policy clarifies that eligibility is intended for private sector tenants and owners.

2.3.4 It is further proposed that

- the existing 4 categories be revised to 3 of High, Medium and Low priority;
- that the property defects within each category are grouped by priority;
- that information and advice on private sector rights and the Scheme of Assistance is made available to this group of applicants.

2.3.5 The policy will further clarify that where applicants are tenants or owners of mobile homes or caravans they will not be eligible for the High priority category of points. This is because the criteria used to assess built structures such as houses cannot be used to assess this type of accommodation.

2.3.6 In circumstances where it is considered unreasonable for applicants to continue to occupy mobile homes or caravans, the policy will clarify that applicants will be assessed under the homelessness category of housing need.

2.3.7 Poor Housing Condition is described in section 5.7 of the revised HHR Allocations Policy at **Appendix 1**.

## 2.4 **Overcrowding**

2.4.1 The existing policy contains 2 categories of need for overcrowding covering 3 types of household circumstances:

- 1) households with dependent child/children – 15 points
- 2) households with residential access to child/children – 10 points
- 3) households with pregnant women – 15 points

2.4.2 The points awarded to households experiencing 'occasional' overcrowding due to residential access to children is less than that awarded to households with a child living with them permanently or for a household where there is a pregnant woman.

2.4.3 The annual monitoring report detailed that the number of households who have provided evidence of their residential access and who are therefore exercising their legal parental responsibilities and eligible for overcrowding points is extremely low relative to the number of applicants who have children for whom they have equal shared parental responsibility.

2.4.4 It is proposed to introduce a single category of overcrowding with a unified points award. This would be a more equitable and consistent approach providing that emphasis on the provision of evidence remains an eligibility requirement.

2.4.5 Overcrowding is described in section 5.8 of the revised HHR Allocations Policy at **Appendix 1**.

## 2.5 **Underoccupation**

2.5.1 The annual monitoring report evidenced good outcomes for households who were underoccupying with no need to further prioritise through an increase in points level.

2.5.2 This data provides a useful source of information about the number of tenants who are living in family sized accommodation and who have applied to transfer house because of a need to downsize. The wider pattern of underoccupation across all tenants is not clear.

2.5.3 As a way of stimulating the potential supply of family homes it is proposed to develop and offer financial and practical incentive packages to current and future transfer applicants who would be freeing up properties one or more bedrooms larger than the house they move to.

2.5.5 It is further proposed that any incentive package will require to be prioritised at an area level taking account of factors such as:

- the demand for the type of property being vacated
- the demand for the location of the property being vacated
- the need for adaptations to the existing home and the estimated timescales
- the potential of the existing home to be adapted

2.5.6 It is therefore proposed to link underoccupation with a wider approach of personal financial and practical incentives. This is aimed to help households achieve suitable housing, make better use of the housing stock, and improve management of adaptations and capital budgets.

2.5.7 Underoccupation is described in section 5.11 of the revised HHR Allocations Policy at **Appendix 1**.

## 2.6 **Special Lettings Plans - New Build**

2.6.1 Under current legislation and guidance, providing the assessment of local connection is not determined by length of residence, landlords may operate a separate allocation system for different parts of their area.

- 2.6.2 It is proposed to introduce Special Lettings Plans as a system for prioritising allocations for new build housing in small communities with a significant housing pressure indicator.
- 2.6.3 It is also proposed that allocations within Special Lettings Plans be managed by a quota system in order to demonstrate legal compliance with primary allocations provisions.
- 2.6.4 Applicants with a special requirement to live in communities eligible for a Special Lettings Plan will have this need recognised on their application in addition to any other housing needs.

**2.7 Eligibility for Special Lettings Plans**

2.7.1 It is proposed that small communities with a population of less than 1,000 and with an above average ratio of demand to turnover of housing would be considered for a Special Lettings Plan. The communities where plans would be considered on this basis are listed below:

Acharacle	Dornie	Marybank
Achiltibuie	Fort Augustus	Nethybridge
Ardgay	Glencoe	Plockton
Balmacara	Helmsdale	Poolewe
Carbost	Kincraig	Rogart
Carrbridge	Knoydart	Roy Bridge
Contin	Kyleakin	Shieldaig
Cromarty	Laggan	Spean Bridge
Croy	Lochaline	Strontian

- 2.7.2 This is an indicative list at this stage, and subject to further consultation. Any plan would require to be developed with the community, generally through a Community Council or a Community Association.
- 2.7.3 The specific objectives of a Special Lettings Plan will be subject to discussion between the Community Councils/Community Associations and representatives of Highland Housing Register to include a review of allocations monitoring information and consideration of any evidence from an independent community needs assessment.
- 2.7.4 Where communities do not satisfy the stated criteria, Special Lettings Plans may nevertheless be considered where there is evidence to support an alternative approach to allocations and where Highland Housing Register monitoring information evidences that the intended policy outcomes are not being met.
- 2.7.5 Any Special Letting Plans would be subject to an equalities impact assessment. The Housing and Social Work Committee and the governing bodies of participating landlords with housing stock in the community affected would be required to approve Plans.

## 2.8 **Housing Applications for designated Special Lettings Plans**

2.8.1 Housing applicants will complete a supplementary application providing evidence of their need to reside in the community which is eligible for a Special Lettings Plan.

2.8.2 Where an applicant meets the criteria established by the Special Lettings Plan the applicant will be identified on the Highland Housing Register as having an “enhanced” connection to that community.

2.8.3 Applicants will otherwise have their housing needs assessed according to the general provisions of the Highland Housing Register Allocations Policy.

## 2.9 **Managing Allocations in Communities with Special Lettings Plans**

2.9.1 Allocations to new build housing subject to Special Lettings Plans would be by means of a Quota System in order to demonstrate compliance with the general provisions of the Allocations Policy.

2.9.2 In a Quota System a percentage of allocations is set for different ‘groups’ of applicants. So that for example:

- Transfer List – 20%
- Housing List – 50%
- Special Lettings Plan – 30%

2.9.3 The Quotas applied to Special Lettings Plans will be set individually based on the outcome of the allocations monitoring and wider needs assessment referred to in 2.7.3.

2.9.4 Allocations would then be monitored to make sure that the target allocations to each group are met.

2.8.5 The annual allocations monitoring report to Housing and Social Work Committee will include information on the demand for Special Lettings Plans, the allocations outcomes for each and review the communities where plans would be considered.

2.9.6 Section 7 of the revised HHR Allocations Policy at **Appendix 1** covers Special Lettings Plans

## 2.10 **Special Lettings Plans - General**

2.10.1 Special Letting Plans can also be considered where evidence shows that the objectives of the Allocations Policy are not being achieved for a particular community or regeneration area through the normal operation of the policy.

2.10.2 If evidence available from monitoring suggests policy objectives are not being achieved in particular communities a further more comprehensive assessment would be undertaken. This analysis would identify whether any particular “housing needs” groups were being disadvantaged by the operation of the policy. Where necessary a more detailed community needs assessment would be undertaken to

provide further evidence.

- 2.10.3 Special Letting Plans would be developed in consultation with local communities and would be designed to give additional priority to specific needs groups that were being disadvantaged through the operation of the policy.
- 2.10.4 Individual Special Letting Plans would be subject to an equalities impact assessment, and approval by the Housing and Social Work Committee and the governing bodies of participating landlords with housing stock in the community affected. Arrangements would be time limited and subject to annual reassessment and review.

### **3. General Revisions to Highland Housing Register Allocations Policy**

- 3.1 A revised policy taking account of the key policy changes proposed in section 2 of this report is attached at **Appendix 1**.
- 3.2 The revised policy makes clearer reference to the provision of detailed supply and demand data as well as advice and information for applicants at the point of application. This includes signposting to the recently revised Housing Options Manual: Finding Housing in the Highlands.
- 3.3 This approach is aimed at improving applicant awareness of the social housing market in Highland and their prospects of achieving a housing outcome within it. It is intended to develop a more progressive model of housing options and this will be reported at a future Committee.

### **4 Links to Homeless Strategy**

- 4.1 Highland's Homeless Strategy was agreed last year with a wide range of actions for implementation in preparation for the challenging 2012 national target to abolish priority need.
- 4.2 The Allocations monitoring report of 16 September 2009 showed that in the last year 45% of allocations were to homeless households although this varied greatly between areas.
- 4.3 The Council is currently undertaking a review of its Homelessness Policy and examining changes to working arrangements aimed at implementing measures that will prevent homelessness and reduce the time taken to discharge homelessness duties.
- 4.4 This review also aims to increase the effectiveness of multi-agency working to both prevent homelessness and achieve more sustainable housing outcomes for those homeless households with multiple or complex needs.
- 4.5 A more detailed report on homelessness policy will be presented to Committee in early 2010.

## 5 Consultation and Implementation

- 5.1 It is proposed that the revised policy be subject to consultation with a cross section of applicants and key stakeholders as well as an Equality Impact Assessment.
- 5.2 It is further proposed, subject to the outcomes of these processes, that the revised policy be implemented from April 2010.

## 6. Recommendation

Committee is asked to approve the revised Highland Housing Register Allocations Policy as contained in **Appendix 1** subject to consultation and including the following key changes:

- a) Extension of the eligibility for care and support points.
- b) Revision of the wording of the policy in relation to local connection points.
- c) Simplification of the use of points in relation to poor housing conditions
- d) Introduction of a single category of points in relation to overcrowding
- e) Development of financial and practical incentives for people who are under-occupying social housing to move to smaller houses.
- f) Introduction of a system for prioritising allocations for new build housing in pressured communities.

### Signature:

**Designation:** Director of Housing and Property

**Date:** 3 November 2009

**Author:** Lyn Kilpatrick, Housing Policy Officer

### Background Papers:

1. Report to Housing and Social Work Committee 16 September 2009 HHR Annual Monitoring Report
2. SEDD Circular 1/2002 s 22 – Housing Lists and Allocations

# **Highland Housing Register Allocations Policy**

**Draft – November 2009**

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## Section 1: Introduction and Policy Context

### 1.1 Highland Housing Register

This is the Allocations Policy for Highland Housing Register (HHR).  
It sets out:

- 1) How to apply for social housing from any of the **partner** landlords. (section 4)
- 2) How your applications for housing will be assessed by all of the **partner** landlords. (section 5)
- 3) How the **partner** landlords will allocate empty houses. (section 6)

The Highland Housing Register **Partner** landlords are:

- 1) The Highland Council
- 2) Albyn Housing Society Ltd,
- 3) Cairn Housing Association Ltd,
- 4) Lochaber Housing Association Ltd,
- 5) Lochalsh and Skye Housing Association Ltd,
- 6) Pentland Housing Association Ltd and

There are other social housing providers in Highland who operate their own separate housing registers for allocating their own empty houses. The Highland Housing Register partners will cooperate with these **participant** landlords and use the Highland Housing Register to select applicants when requested to do so in term of any nominations arrangement.

The Highland Housing Register **Participant** landlords are:

- Hanover Housing Association Ltd,
- Key Housing Association Ltd,
- Link Housing Association Ltd,
- Margaret Blackwood Housing Association Ltd and
- Trust Housing Association Ltd.

### 1.2 Strategic Context

This Allocations Policy is linked to and is in support of a range of other strategies. This includes the Homelessness Strategy, Highland Housing Strategy, the Anti-social Behaviour strategy.

### 1.3 Allocations Policy Statement

The purpose of this Allocations Policy is to define a consistent needs based approach to allocate social housing becoming available in Highland for rent.

It is also intended that the Highland wide monitoring information available from Highland Housing Register will be of value in helping to identify housing investment priorities.

### 1.4 Allocations Principles

The Highland Housing Register partners agree to be guided by the following principles:

**Consistency:** This Allocations Policy will be delivered fairly and consistently across the partner landlords in all areas of the Highland.

**Openness:** This Allocations Policy and details of how it operates will be freely available. Details of the turnover of social housing across the partners will also be freely available to help applicants make informed choices and to ensure HHR does not raise unrealistic expectations.

**Legality:** This Allocations Policy will be compliant with relevant legislation including the Housing (Scotland) Act 1987 as amended by the Housing (Scotland) Act 2001 and the Homelessness Etc (Scotland) Act 2003.

**Equal opportunities:** It is intended that no applicant is treated unfairly for any reason, either because of their race, colour, ethnic background, religion, class, sex, age, disability, mental health, sexuality or family circumstances. We will undertake and report ethnic monitoring and respond to any emerging issues. The Allocations Policy will be subject to an Equality Impact Assessment.

**Accountability:** Decisions and actions are required to be accountable, transparent and open.

**Confidentiality:** The landlords who are partners in the HHR are registered under the Data Protection Act 1998 and are duty bound to comply with the conditions set out in this legislation now and in the future. Personal details of individual applicants will not be released to anyone other than the applicant or any advocate for whom the applicant has provided consent for disclosure.

## 1.5 Aims of the Allocations Policy

The 9 key aims of the Highland Housing Register are:

- 1. To provide housing to those in the greatest need, dependant on individual circumstances.**  
The Highland Housing Register is a needs based system. Applicants will have their individual housing need assessed according to the Housing Need Categories and Priorities set out in this Policy and allocations will be made on the basis of housing need.
- 2. To help to prevent and deal with homelessness.**  
The Highland Housing Register aims to support delivery of the Homelessness Strategy and the Homelessness Policy for Highland.
- 3. To help create and maintain strong and economically viable communities.**  
The Highland Housing Register will use Special Lettings Plans to help sustain communities with small populations and housing pressure.
- 4. To work with our partner HHR landlords to provide suitable housing for those with special needs.**  
The Highland Housing Register partners will work together to maximise housing options for people with different needs including planning for future provision of unmet needs.

5. **To make the best use of the housing available.**  
The Highland Housing Register partners will develop and implement a downsizing incentive scheme for tenants who are in homes too large for their needs. HHR partners will allocate houses according to the property size eligibility detailed in section 5.3.
6. **To give applicants a range of choices of housing.**  
The Highland Housing Register provides applicants with opportunity to choose from a variety of house types across the 6 partner landlords operating across Highland.
7. **To help applicants move within the Highland area, and from other parts of the UK.**  
The Highland Housing Register makes applying for housing in Highland simpler.
8. **To monitor performance and respond to changing patterns of needs by regularly reviewing this allocations policy.**  
The Highland Housing Register will undertake monthly and annual monitoring and respond to emerging issues.
9. **To inform the Highland Council's planning processes.**  
The monitoring information will be used to influence investment priorities in the Highland Housing Strategy.

## **1.6 Confidentiality**

The HHR landlords will process the information contained in your application form and any other relevant information they obtain in connection with your application in a number of ways:

- They will process the information for the purpose of your application for housing.
- They may also use this information to provide anonymous statistical data to their Committees, Boards of Management, the Scottish Government and other interested Parties
- In addition, if you are successfully housed by one of the HHR landlords, that landlord will retain your information in your tenancy file. You have the right to see any details held in your personal files, on request. There may be a charge for this.
- By signing the application form, you give consent to the HHR landlords processing the information in this way.

## **1.7 Information and advice**

A free copy of this full policy will be made available to anyone who asks for it. We will also make a shorter version of it available in appropriate formats, including on the website of HHR landlords and as a leaflet. We will make the policy available in other languages and formats (such as in Braille, in larger font or on audio tape) if requested.

HHR will treat all applicants sensitively and fairly. You can ask to meet a member of staff to discuss your housing application at any time. You can ask for information,

advice and support with your housing options at any time. If you want, you can have a relative, friend or adviser with you at the meeting. Meetings will be held in private rooms whenever possible and all information will be kept confidential.

We will provide free information and advice on housing options in the Highland area, and will help you get access to independent advice and information.

## Section 2: Legal and Regulatory Requirements

### 2.1 Legal Requirements

This Allocations Policy has been developed with respect to relevant legal requirements and good practice standards.

As a needs based system the Highland Housing Register will give reasonable preference to households who:

- are homeless, or threatened with becoming homeless;
- are living in homes that are in poor condition;
- are living in homes that are overcrowded;
- have large families; or
- are living in housing conditions that are not satisfactory.

The categories of housing need in section 5 are based on these types of circumstances.

### 2.2 Regulatory standards

This Allocations Policy has been developed with respect to the following 2 activity standards:

**Access to Housing:** We make sure that people have fair and open access to our housing list and assessment process. We work with others to maximise and simplify access routes into our housing. (Activity Standard 1.1)

**Lettings:** We let houses in a way that gives reasonable preference to those in housing need; makes best use of available stock; maximises choice; and helps to sustain communities. (Activity Standard 1.2)

### 2.3 Factors which cannot be taken into account

The law requires the Highland Housing Register to ignore certain factors when **selecting** tenants for empty houses. These are:

1. How long you have lived in the area.
2. Any debts (such as rent arrears) from a property of which you were not the tenant.
3. Any debts you had owed from a previous tenancy, but which you have now paid off.
4. Any debts you still owe where:
  - the amount you owe is less than 1/12th of the amount you had to pay over a full year for the tenancy; or
  - you have agreed arrangements with the landlord for paying off the debt and have kept to these arrangements for at least three months.
5. Any debts (including Council Tax arrears), owed by you or anyone who is going to live with you, which do not relate to the tenancy of a home (including any previous tenancy).
6. Your age (as long as you are 16 or over), unless the tenancy is for a home that:
  - has been designed or adapted for people of a particular age group; or

- is for people who are or will be getting housing support services for a particular age group.
7. Your and your family's income.
  8. Whether you or any member of your household owns or has owned any property that can be inherited, regardless of its value.

## 2.4 Residence Factors

The law also requires that when **selecting** a tenant the Highland Housing Register cannot take account of whether an applicant is living in Highland if the applicant:

- works, or has been offered a job in the area
- wants to move into the area to find a job and HHR is satisfied of this intention
- wants to move into an area to be near a relative or carer
- has a special social or medical reason for needing to live in the area
- wishes to move into the area to escape harassment
- wants to move into the area to escape the risk of domestic violence

## 2.5 Non UK Nationals and Access to Social Housing

The rights of non-UK nationals to housing and homelessness provisions are a complex area. Staff can advise applicants on individual cases.

Legislation includes the following categories as eligible for allocation:

- anyone granted refugee status
- anyone granted exceptional leave to remain
- anyone granted indefinite leave to remain
- anyone who is a national of an EU country who is employed and registers with the
- workers registration scheme or has the right to reside in the UK, or who is normally
- resident.

## 2.6 Tenancies to Staff/Committee members/Councillors and their relatives

Special rules apply if you or anyone you live with is a close relative of someone who is or has been at any time in the last 12 months:

- a member of staff of any of the Highland Housing Register partners
- a member of the management committee or a Highland Councillor

In these cases applicants must declare their interest on the housing application form.

Where the connection is to the Highland Council, any offer must be approved by the Director of Housing and Property. Where the interest is to a partner landlord, any offer must be approved through the relevant Management Committee.

A close relative is defined as a direct relative by blood or marriage (including step relatives), for example, your son or daughter (including adopted children), mother or father, brother or sister, grandparent, grandchild, husband/wife or partner (either sex).

## Section 3: Housing Options

### 3.1 Housing Options

The '**Finding Housing in the Highlands**' manual will give you more information about your housing options in Highland. This includes details of where to access information about the private rented sector or specialist housing organisations or providers. This is available on the Highland Council's website:

<http://www.highland.gov.uk/livinghere/housing/findinghousing/aguidetohousingoptions/>

and also at your local housing office or Council Service Point.

### 3.2 Mutual Exchanges

Applicants who are social housing tenants of any Registered Social Landlord can apply to exchange homes through the HHR partner's independent mutual exchange schemes where they meet the eligibility criteria.

### 3.3 National Exchange Schemes

Applicants who are social housing tenants can also register with national schemes such as

'**HomeSwapper**' or '**House Exchange**' which help people to access housing in different geographic areas. You can get more information about these schemes at:

- <http://www.homeswapper.co.uk/>
- <http://www.houseexchange.org.uk/>
- or from staff in any of the HHR offices.

### 3.4 Nomination Agreements

Highland Council has nomination agreements with Registered Social Landlords who have housing stock in Highland but who are not partners of Highland Housing Register. These landlords are the **participant** landlords noted in section 1.1 of this policy

This agreement allows the Highland Council to nominate applicants from the Highland Housing Register for a percentage of the empty houses becoming available. This is usually 50%.

Nominations are selected on the basis of housing need as with the general provisions of this Allocations Policy. Participant Landlords will then assess applications and make offers based on their own separately available assessment system.

### 3.5 Section 5 Referrals

Section 5 of the Housing (Scotland) Act 2001 provides a statutory mechanism for local authorities to refer applicants with a homeless assessment to any Registered Social Landlords for allocation of any forthcoming empty houses.

It is recognised that the need for the Section 5 mechanism reduces within a common housing register such as Highland Housing Register where partner

organisations have a shared commitment to prevent and help homelessness and are allocating empty properties through a shared register.

Separate Guidance is available on Section 5 referrals covering timescales, good reason for refusal and other relevant issues.

### **3.6 Incentives to downsize**

HHR is committed to supporting financial and practical incentive packages designed to stimulate supply of family homes occupied by tenants who no longer have a need for large family sized homes.

Highland Housing Register applicants who are tenants of the partner landlords will be eligible to apply for a Downsizing Incentive Package if they are underoccupying and wish to accept the offer of a more suitable smaller sized house.

## **Section 4: Applying for Housing**

### **4.1 Access to the Housing List**

The Highland Housing Register is an open access housing register. Applications can be accepted at any time from anyone providing they are aged 16 years or over unless they are persons from abroad who are subject to immigration control within the meaning of the 1996 Asylum and Immigration Act.

You can make an application jointly with another person or people who want to live with you, even if you are not living in the same household at the moment.

If you make a joint application your housing needs assessment will be based on the applicant who is living in the worst housing circumstances. We will normally offer a joint tenancy to joint applicants.

Tenants of the partner landlords will have their applications held on a Transfer List which forms part of the general housing register.

A quota is set each year to manage the number of allocations to transfers and applicants. The quota for 2010/2011 is 20% to transfers and 80% to applicants.

### **4.2 Where you want to be housed**

You can select up to 10 areas where you will accept housing. Applicants should consult with HHR staff for advice and information about the turnover of empty houses of the size and type they need in the areas they wish to live.

We also ask you to tell us the area you would prefer to live. This is to help understand and plan for future provision.

### **4.3 Application checking and verification**

All reasonable enquiries will be made to check your household's circumstances. This may include home visits. We will always make these enquiries in a sensitive and appropriate way. If we receive clear evidence that a particular allocation is unsuitable or inappropriate, we reserve the right to bypass your application and record the reason for this.

### **4.4 Tenancy References**

#### **Current and Former Tenancies**

If you or your joint applicant currently has a tenancy (or has had a tenancy within the last five years), we will ask for a reference from your current or former landlord specifically about:

- your rent account history
- the condition of the property
- anti-social behaviour

If a reference is not satisfactory we will tell you about how this may affect your application.

If you are a tenant and your landlord's reference says that you are not keeping your current home and garden in a reasonable condition, we may suspend your

application until you tell us that you have brought your property up to a reasonable standard and your landlord confirms this.

### **Tenants of HHR partners**

If you are a tenant of any of the HHR landlords and you want to transfer to a property with the same or any other HHR landlord, we will make the same enquiries to your landlord and inspect your current home and garden before we make you an offer. If your property is not in a reasonable condition or there are other issues with the tenancy, we will not offer you a transfer. We will not consider you for a further offer until your landlord confirms that an offer can be made.

## **4.5 Suspensions**

We may suspend your application if you:

- have rent arrears or other debts which you still owe
- are an existing tenant of any other provider of public housing and you have not kept your house and garden in a reasonable condition
- are a tenant of one of the HHR landlords and are applying for a transfer and you have not kept your house and garden in a reasonable condition
- have a history of antisocial behaviour
- have provided false or misleading information
- have refused a second reasonable offer of housing

If we suspend your application you will not be offered a tenancy for the period of the suspension unless your household's needs outweigh the other issues.

Suspensions will normally last for six months and will be subject to review within this timescale. We will tell you the reasons for the suspension in writing and give you advice about other possible sources of housing. We will also tell you about your right to appeal our decision.

If we think you have given false or misleading information, your application will be suspended while we make investigations. If this investigation determines that you knowingly gave false or misleading information, we will require you to make a new application based on your true circumstances. We will give you written details of why we have taken this decision, and of your right to appeal against our decision.

If you have already been given a tenancy, and the false or misleading information affected the decision to offer the tenancy, the relevant HHR landlord may take legal action to recover the tenancy.

## **4.6 Anti-Social Behaviour**

### **Applications**

If there is clear evidence that you or anyone living with you or visiting you have behaved antisocially (usually within the last three years) we may suspend your application for up to six months. If you provide evidence from an appropriate professional e.g. Police, Criminal Justice Service that there has been a change in behaviour, we will consult with the Anti-Social Behaviour Partnership Group and may lift the suspension after a reasonable period.

## **Offers**

If there is clear evidence that you or anyone living with you or visiting you have behaved antisocially (usually within the last three years) we will refer any offer of housing for risk assessment through the Anti-Social Behaviour Partnership Group. This is further explained in section 6.4 Sensitive Lettings.

## **4.7 Review of Applications**

Every year we will write to you to ask you to confirm whether or not you want to stay on the housing list. When we write to you we will tell you what we know about your housing circumstances and needs and points.

You must let us know of any changes that may affect your assessment and confirm that you want to remain on the register.

## **4.8 Cancelled Applications**

If we do not hear from you after we have sent our annual review letter, we will send you one final reminder letter. If we do not get a response to that letter we will cancel your application.

You can apply to go on the housing list again at any time and we will consider your new application based on your current housing circumstances.

You can also request to cancel your housing application at any other time. We will write to you to confirm that we have cancelled your application.

## **Section 5: Housing Need Categories and Priorities**

### **5.1 Assessing Housing Need**

We will assess everyone's housing need according to their individual circumstances and award priority based on the Housing Need Categories and Priorities detailed later in this section.

In this way we can treat everyone's application consistently and fairly.

### **5.2 Housing Support**

As part of the housing needs assessment process housing support needs will be identified, referred and assessed by relevant specialist services and support plans produced.

Housing Support services are available to a range of vulnerable people and are aimed at preventing homelessness or repeat homelessness.

### **5.3 Property Type and Size**

We will not normally offer you a home in which you will have more than one extra bedroom.

We will not normally offer you a home that would result in you being overcrowded unless you have agreed to accept a smaller sized property as this would result in an improvement to your existing circumstances **and** there is no anticipated turnover of the required property size.

Where there are a limited number of one-bedroom properties in an area, single people or couples will be considered for two-bedroom properties on an equal basis as those with a 2 bed need.

We will normally give preference to applicants who have a need for any special facilities or features that the property provides, for example level access or ground floor accommodation, or walk in shower.

Where an assessment of your needs indicates a need for a particular type of housing you will only be offered housing of this type or housing which can be suitably adapted.

In certain circumstances we may ask an occupational therapist or another specialist to assess if the property we are thinking of offering you is suitable for your needs.

Where a parent or guardian has residential access to a child or children for more than 50% of the week they will be eligible for a bedroom for that child or children. Otherwise, the child is assumed to be adequately housed by the primary carer.

### **5.4 Homelessness**

Homelessness assessments can only be undertaken by Highland Council staff as Highland Council is the only partner with legal responsibility for statutory homeless assessments.

There are a range of different assessment outcomes which impact the priority awarded to an application:

**1. Homelessness / Potentially Homeless & Priority Need**

Applicants who are assessed as eligible for priority under this category are not able to unreasonably restrict their 10 selected areas.

**A Homeless**

If your application has been assessed as Homeless, Priority Need and unintentionally homeless, you will be awarded **70 points**

**B Potentially homeless**

If it has been assessed that you are likely to become Homeless within the next two months, that you are in priority need and unintentionally so, you will be awarded **50 points**.

Applicants with **Homeless** or **Potentially Homeless** points are **not eligible** for certain other housing need points such as **overcrowding** or **sharing** points or **poor housing condition** points. This is because the high level of housing need is already reflected in the homelessness points awarded.

Applicants with Homeless or Potentially Homeless points do continue to be eligible for “personal housing need points” where they have an assessed need. i.e. points that are awarded for personal needs, e.g. medical or care & support points.

**C Time spent in temporary accommodation**

If you are awarded the **70 homeless points** you will receive **2 additional points** for each complete month you spend in this situation regardless of whether or not you have been housed in Temporary Accommodation by The Highland Council. You will only qualify for these points if you are assessed as being entitled to permanent housing.

**2 Homelessness / Potentially Homeless - Non Priority or No Local Connection or Priority Intentional**

If your application is assessed as:

- Homeless or Potentially Homeless but with no priority need or no local connection, or
  - Homeless or Potentially Homeless with priority need, but intentionally so
- your application will be awarded **20 points**.

Applicants in these categories are **eligible** for other housing need points such as **overcrowding** or **sharing** points or **poor housing condition** points.

Applicants in these categories are **also eligible** for “personal housing need points” where they have an assessed need. i.e. points that are awarded for personal needs, e.g. medical or care & support points.

Applicants in these categories are not eligible for any further points under Insecurity of Tenure.

## 5.5 Insecurity of Tenure

### HHR tenants in leased properties

If you are a tenant of a Highland Housing Register landlord living in a home that your landlord leases from a private landlord for a fixed period, you will receive **30 points** once a valid Notice to Quit has been served by the private landlord or when there is 6 months or less until the confirmed lease expiry date.

### No right or title

If you are living in a home to which you have no right or title and may be asked to leave at short notice, your application will be awarded **15 points**. This includes B&B, c/o friends or relatives, parental home, lodgings, shared accommodation.

### Limited security of tenure

If you are in a short-assured tenancy, tied tenancy, or HM forces accommodation your application will be awarded **10 points**.

If there is a **valid Notice to Quit** and you have less than 6 months left on the lease your application will be awarded an additional **5 points** i.e. **15 points in total**. Where a landlord is enforcing the Notice to Quit applicants must make a homeless application.

## 5.6 Sharing Facilities

You will receive **20 points** if you live in a home where you **have** to share facilities with other people who will **not** be housed with you.

Applicants assessed as unintentionally homeless and in priority need are not eligible for sharing facilities points as noted in section 5.3.

## 5.7 Poor Housing Condition

Private Sector properties are eligible for all categories of Poor Housing Condition.

Tenants in social housing are not eligible for any categories of Poor Housing Condition.

Caravans/mobile homes/tents/temporary structures are eligible for category 2 and where the condition of the accommodation is unreasonable to occupy staff should support the household for a homelessness assessment.

### Category 1: High

Properties which have one or more of the following significant defects will be awarded **70 points**.

- Not structurally safe
- No mains electricity/electricity unsafe
- No piped water
- No waste system
- Significant rising/penetrating damp/water penetration

Applications must be referred to Highland Council TEC Services for inspection.

### **Category 2: Medium**

Properties which lack one or more of the following amenities will be awarded **20 points**

- No fixed sink/wash-handbasin/bath/shower
- No inside WC
- No central heating
- Mild dampness or water penetration
- No satisfactory cooking facilities

Applicants require to provide proof where possible, otherwise eligibility for the awarded points requires to be verified at point of allocation verification.

### **Category 3: Low**

Properties which have one or more of the following condition will be **awarded 5 points per condition up to a maximum of 10 points.**

- Poor ventilation
- Partial central heating
- No satisfactory artificial or natural light
- Other items of disrepair which fail Repairing Standard
- No or poor loft insulation
- does not have satisfactory access to an external door from the public road, ie no footpath to front door.

Applicants require to provide proof where possible, otherwise eligibility for the awarded points requires to be verified at point of allocation verification.

Applicants indicating Poor Housing Condition will be provided with information about the Scheme of Assistance and/or The Repairing Standard to assist them in achieving improvements to their housing conditions.

## **5.8 Overcrowding**

To work out if you are overcrowded we assume that no more than two people should share a bedroom and that separate bedrooms are needed for:

- each couple
- each single person aged 16 or over
- a child aged 6 years or over, of different sex from other children of any age
- each child of 4 years or more age difference to other children, including children of the same sex

We will consider the size of the home you live in now and your application will be awarded **15 points** for each extra bedroom you need up to a **maximum of 60 points.**

If you need an extra bedroom because you or your partner is pregnant your application will be awarded **15 points** as soon as we have proof of the pregnancy. When we offer tenancies we may give preference to households that are already overcrowded.

### **Overcrowding as a result of access to children**

If you have a child or children who regularly stay overnight as part of a residence or access arrangement and you can provide proof of this arrangement your application will be awarded **15 points.**

Only one award of overcrowding points will be made under this category regardless of how many children are involved, and you will only be eligible for one extra bedroom for all children. This is because the children are adequately housed by their primary carer.

## 5.9 Care and Support

You will receive up to a maximum of **50 points** if:

- You have an identified need for independent living and where you are living is no longer appropriate, for example: in a residential care or nursing home, a hospital, in supported accommodation with a care package, or in the parental home with a care package **(50 points)**
- The Council has a statutory duty of care in terms of your follow on accommodation for example, you have been a looked after child in a care or kinship arrangement **(50 points)**
- You need access to specialist support services **(20 points)**
- You need to move to provide care and support services, for example,
  - through kinship care arrangements **(20 points)**
  - you need to move so that a carer can live with you to enable you to live independently **(10 points)**
  - you need to move to receive care from a friend or relative to enable you to live independently **(10 points)**
  - you need to move to provide care to a friend or relative to enable them to live independently **(10 points)**
  - you or a member of your household needs to move to be nearer facilities or services to maintain independent living **(10 points)**

Eligibility will be based on evidence of your circumstances from an appropriate professional.

## 5.10 Local Connection

You will be awarded **20 points** if you have an established social or family network in an area or you otherwise have a need to reside in the area for the following reasons:

- to accept or maintain employment in the area applied for, or
- to receive or provide essential care or support in the area applied for.

In line with Scottish Government Guidance ex-service personnel will be awarded **20 points** for local connection regardless of whether they have a need to reside.

## 5.11 Underoccupation

We will award points if you have more bedrooms than you need where you live now (using the same guidelines as for overcrowding – see above) in order to make the best use of stock.

If you are a current tenant of a HHR Partner landlord you will receive **20 points** for each extra bedroom you have – regardless of how many extra bedrooms you have.

If you are not currently a tenant of a HHR Partner landlord you will receive **10 points** for each extra bedroom you have up to a **maximum of 20 points**.

In these circumstances, the number of points you will be awarded for under occupancy will also be affected by the size of the home you are being considered for, compared to the one you are currently in. So, if you are in a 2 bedroom house and are under occupying it by 1 bedroom, those points will not be taken into account if you are being considered for another 2 bedroom property.

### **5.12 Two Households for One**

You will receive **30 points** if you are the tenant of a partner landlord and you want to form a new household with another person who is a tenant of a partner landlord provided any allocation will result in both houses being left vacant and available for allocation through Highland Housing Register.

### **5.13 Medical Needs**

If your health is made worse by your current living conditions, you must complete a Medical Assessment form. Your medical needs will then be assessed by an NHS independent medical advisor. Your application will be awarded will points depending on whether your medical priority is assessed as:

- urgent (**70 points**)
- high (**30 points**)
- medium (**20 points**)
- intermediate (**10 points**)
- low (**5 points**)

If the medical assessment identifies a specific type of housing that you need to improve your health (for example, a ground-floor flat because you cannot walk easily) your points will be eligible for that property type only.

### **5.14 Special Allocations Status**

If there are exceptional circumstances which cannot be recognised by the other categories of housing need in this policy you may be awarded "Special Allocations Status" if your circumstances are confirmed by appropriate agencies.

As this award is intended to deal with extremely urgent or exceptional circumstances only one offer of housing will normally be made. Decisions for an award under this category can only be Highland Housing Register senior staff.

## 5.15 Summary of Housing Need Categories and Points

<b>Group A</b>	
Homeless Priority Need Unintentional	
Poor Housing Conditions - High	<b>70 Points</b>
Medical Need - Urgent	
<b>Group B</b>	
Potentially Homeless Priority Need Unintentional	
Assessed need to move to independent living from residential care/hospital/supported accommodation/ other inappropriate accommodation	<b>50 Points</b>
<b>Group C</b>	
Tenants in properties leased by any of the HHR Landlords with less than 6 months left on lease or where NTQ served	<b>30 Points</b>
Two households combined – where both houses can be relet through HHR	
<b>Group D</b>	
Potential or Actual Homeless, Non Priority	<b>20 Points</b>
Moving to access specialist support services not otherwise available	
Under occupation - HHRtransfers (per bedroom - no limit)	
Sharing Facilities (1 set of points regardless of how many facilities are shared)	
Poor Housing Conditions – Medium	
Medical Need - Medium	
Local Connection – where meets ‘ <b>need</b> to reside’ definition	
<b>Group E</b>	
Overcrowding (per bedroom up to max <b>60</b> ).	<b>15 Points</b>
Insecure Accommodation (eg, C/o parental home/friends/family/lodgings)	
Valid Notice to Quit on a Short Assured Tenancy	
<b>Group F</b>	
Applicants with a short-assured tenancy, tied tenancy, or HM forces accommodation	<b>10 Points</b>
Care & Support – where need to move provide receive care, or improve or maintain access to activities/services where not otherwise available	
Under occupation – HHR Applicants (max 20 points)	
Medical need - Intermediate	
<b>Group G</b>	
Poor Housing Condition – Low (up to maximum of 10 points)	<b>5 Points</b>
Medical need - Low	
<b>Group H</b>	
Time spent in temporary accommodation where HPNU (per month)	<b>2 Points</b>

## **Section 6: Allocation of Housing**

### **6.1 How houses are allocated**

Each application is assessed fairly and consistently with respect to the Housing Need Categories at section 5 and points awarded for circumstances.

In this way the register is able to prioritise and rank your application relative to the needs of other households on the register.

As the system is open access, the ranking changes from day to day as applicants are housed and new households register.

Selection of applicants for empty houses is by a 'shortlisting' process which identifies applicants whose needs, choices and preferences match the property type, size and location characteristics of the available property.

Allocations are then made to the applicant with the greatest housing need for the property type being offered.

### **6.2 By-passing applications**

In some circumstances it might be necessary to by-pass the highest ranked applicant with greatest overall priority for an offer. Reasons for this could include:

- where the property offered is not suitable for a specific medical recommendation
- where an applicant has significant rent arrears or housing debt and no arrangement has been negotiated
- where the existing home has not met transfer inspection standards and an arrangement has not been negotiated

By-pass reasons will be recorded and monitored on all allocations.

### **6.3 Offers and Refusals**

All applicants will be made 2 reasonable offers of housing. In deciding what is reasonable account will be taken of the property type and location choices made on the housing application, and the property type and size the household is eligible for.

In the case of households with Homelessness Priority Need, account will also be taken of the advice in the Scottish Government's Code of Guidance on Homelessness including consideration of the availability of housing in the areas an applicant has selected. For this reason offers to applicants in these circumstances may not necessarily be in the preferred areas.

After a first reasonable offer has been refused, applicants will be contacted to provide advice about housing options and to review the application form.

After a second reasonable offer has been refused, the application will be suspended for 6 months.

In the case of households with Homelessness Priority Need, the Council may further consider that it has discharged its duty to you under the terms of the homelessness legislation by making these 2 reasonable offers to you and may

therefore end any temporary accommodation provided to you under the homeless legislation. Applicants have a right of appeal against any decisions made.

## **6.4 Sensitive Lettings**

In some circumstances there may be a need for a Risk Assessment to confirm whether it is appropriate for a particular offer of housing to be made. The arrangements for Risk Assessment will vary according to the different types of risk factors.

### **1) Anti-Social Behaviour**

If there is clear evidence that an applicant or anyone in their household has behaved antisocially (usually within the last three years) we will refer any offer of housing for risk assessment through the Anti-Social Behaviour Partnership Group.

The Anti-Social Behaviour Partnership Groups are area based multi agency partnerships with a role to monitor and progress actions against the perpetrators of anti-social behaviour.

All HHR partner landlords have nominated staff who attend the Anti-Social Behaviour Partnership Groups and in circumstances where there is evidence of anti-social behaviour staff must refer the applicant and offer details to their designated staff member who will request a Risk Assessment.

An offer cannot be made to the applicant unless the Anti-Social Behaviour Partnership Group has confirmed it is acceptable to do so.

An applicant's area choices may require to be reviewed based on any recommendations from this group.

### **2) Multi Agency Public Protection Arrangements (MAPPA)**

Detailed arrangements are in place for public protection through MAPPA. Any applicants subject to these arrangements will be discretely flagged on Highland Housing Register such that any properties to be offered will be subject to Risk Assessment by the multi-agency partners.

An offer cannot be made to an applicant in this category unless the MAPPA has confirmed it is acceptable to do so. Co-ordination and communication with MAPPA partners will be through a designated member of Housing and Property Staff.

An applicants area choices may require to be reviewed based on any recommendations from MAPPA.

### **3) Violence Against Women**

Highland Housing Register will make every effort to ensure that women and children are not housed in the same vicinity of the perpetrator, and that similarly the perpetrator is not housed in a location which would put the women and children at continued risk.

Risk Assessments (including any MARAC arrangements which might be in place) should be referred to the Housing & Property Representative on the local Violence Against Women Forum.

- 4) **Witness Protection – The National Witness Mobility Service (NWMS)**  
The NWMS works with police forces and Local Authorities to streamline the process of rehousing seriously intimidated witnesses.

Highland Housing Register will work with NWMS when contacted with a possible referral.

Any enquiries to an HHR partner about referral under this scheme should be referred to a designated member of Housing & Property Staff.

## Section 7 : Special Lettings Plans

Under current legislation and guidance, providing the assessment of local connection is not determined by length of residence, landlords may operate a separate allocation system for different parts of their area.

In Highland Housing Register Special Lettings Plans can be used

- 1) as a system for prioritising allocations for **new build** housing in small communities with significant housing pressure for the purpose of sustaining the community.
- 2) As a system to prioritise allocations in communities where allocations outcomes are in tension with the aims of the Allocations Policy and where an **alternative time limited** approach would be of benefit to a community, eg for regeneration

### 7.1 Eligibility for Special Lettings Plans

#### 1) Special Lettings Plans & New Build

Small communities with a population of less than 1,000 and with significant housing pressure may be considered for a Special Lettings Plan for new build housing. Normally requests for consideration would come through a representative body such as a Community Council or a Community Association. Details of communities where Plans will be considered will be available and revised annually to reflect turnover changes.

Special Lettings Plans will be subject to discussion with the representative organisation and representatives of Highland Housing Register to include a review of allocations monitoring information and consideration of any evidence from an independent community needs assessment.

Where communities do not satisfy the stated criteria, Special Lettings Plans may nevertheless be considered where there is evidence to support an alternative approach to allocations and where HHR monitoring information similarly evidences a divergence from the intended policy outcomes.

Any Special Letting Plans would be subject to an equalities impact assessment and approval by the Housing and Social Work Committee and governing bodies of social landlords with housing stock in the community affected.

#### 2) Special Lettings Plans in other circumstances

These Special Lettings Plans will also be subject to discussion with any representative organisations and will equally require a review of allocations monitoring information and consideration of any relevant independent research evidence.

### 7.2 Housing Applications for designated Special Lettings Plans

Housing applicants will complete a supplementary application providing evidence of their need to reside in the community which is eligible for a Special Lettings Plan.

Where an applicant meets the criteria established by the Special Lettings Plan the applicant will be identified on the HHR system as having an 'enhanced' connection to that community.

Applicants will otherwise have their housing needs assessed according to the general provisions of the HHR Allocations Policy.

### **7.3 Allocations Quotas in Special Lettings Plans**

Allocations in Special Lettings Plans will be by means of a Quota System in order to maintain and demonstrate compliance with the general primary provisions of the HHR Allocations Policy.

In a Quota System a percentage of allocations is set for different 'groups' of applicants. So that for example:

- Transfer List – 20%
- Housing List – 50%
- Special Lettings Plan – 30%

Allocations are then monitored to make sure that the target allocations to each group is met.

The Quota applied to Special Lettings Plans in HHR will vary according to the outcome of the allocations monitoring and the wider needs assessment referred to in 7.1.1)

The annual monitoring report will include information on the demand for Special Lettings Plans and the allocations outcomes for each.

### **7.4 Special Lettings Plans - General**

Special Letting Plans can also be considered where evidence shows that the objectives of the Allocations Policy are not being achieved for a particular community or regeneration area through the normal operation of the policy.

If evidence available from monitoring suggests policy objectives are not being achieved in particular communities a further more comprehensive assessment would be undertaken. This analysis would identify whether any particular "housing needs" groups were being disadvantaged by the operation of the policy. Where necessary a more detailed community needs assessment would be undertaken to provide further evidence.

Special Letting Plans would be developed in consultation with local communities and would be designed to give additional priority to specific needs groups that were being disadvantaged through the operation of the policy

Individual Special Letting Plans would be subject to an equalities impact assessment, and approval by the Housing and Social Work Committee and the governing bodies of social landlords with housing stock in the community affected. Arrangements would be time limited and subject to annual reassessment and review.

## **Section 8: Monitoring**

To make sure that we act fairly and in accordance with equal opportunities we will monitor our performance by reporting the following information each year:

- 1) The total number of applications received by all partner landlords.
- 2) The number of tenancies offered, and an analysis of the points and needs of those housed.
- 3) The number of appeals against or complaints about, for example, offers of housing or how we have processed applications and the outcomes of these complaints and appeals i.e. upheld or not.
- 4) The number of cases and circumstances in which applicants were housed under special allocations status.
- 5) The number of transfers carried out each year.
- 6) The number of allocations made to Homeless applicants.
- 7) The number of applicants suspended for refusing two suitable offers.
- 8) Feedback from customer satisfaction surveys.
- 9) Details about any Special Lettings Plans.

The HHR Landlords will review this allocations policy at least once every three years to assess how effective it is and examine whether any changes are needed.

We may change this policy to keep it up to date with changing laws or best-practice guidance, or to tackle issues arising from our reviews.

We always welcome feedback and comments from individuals and organisations.

## **Section 9: Appeals and Complaints**

If you have a complaint about how your application has been managed or if you feel you have been treated unfairly you can make a complaint at any of the Highland Housing Register offices.

Your complaint will be managed in terms of the Complaints Procedure of the HHR partner which is holding your application.

If you still feel that we have not dealt with your housing application properly or fairly, you can then complain to the Scottish Public Services Ombudsman.

## **Section 10: Contact Details**

### **The Highland Council**

Housing & Property Service

Glenurquhart Road, Inverness, IV3 5NX 01463 702863

### **Albyn Housing Society Ltd.** (Charity No SCO27123)

Head Office, 98-100 High Street, Invergordon, IV18 0DL : 01349 852978

68 MacLennan Crescent, Inverness, IV3 8DN : 01463 712516

### **Cairn Housing Association Ltd.** (Charity No SCO16647)

Cairn House, 30 Waterloo Place, Inverness, IV1 1NB : 01463 220666

12-14 Dunnet Road, Thurso, KW14 8HY : 01847 894483

### **Lochaber Housing Association Ltd.** (Charity no SCO30951)

101 High Street, Fort William, PH33 6DG : 01397 702530

### **Lochalsh & Skye Housing Association Ltd.** (Charity No SCO38019)

Morrison House, Bayfield, Portree, Isle of Skye, IV51 9EW : 01478 612035

### **Pentland Housing Association Ltd.** (Charity No SCO37286)

37/39 Traill Street, Thurso, KW14 8EG : 01847 892507