

FORTH HOUSING ASSOCIATION LIMITED

ALLOCATION POLICY

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Section 1: The role of the allocations policy

1.1. Introduction

Forth Housing Association has developed its allocation policy to explain how we let houses to:

- applicants on our housing list;
- tenants wanting to move to other accommodation.

This policy also explains how we process referrals from Stirling Council. (See section 5)

The allocation policy is very important as it enables us to:

- meet our legal obligations;
- address different forms of housing need; and
- promote our equality objectives.

Notes

Forth Housing Association is usually referred to as "we" in this policy document.

“Allocation” simply means house letting; allocation and letting are both used in this policy to refer to how we let our houses.

1.2. Policy issues

This policy covers the following issues.

Section 2 describes our key policy aims.

Section 3 summarises the main legal and good practice framework within which we operate.

Section 4 explains our methods of letting houses. We have also established internal procedures.

Section 5 describes our current links with Stirling Council.

Section 6 explains our policy on transfers and mutual exchanges. These terms are explained clearly in this section.

Section 7 summarises our rules concerning the suspension of offers of accommodation.

Section 8 details how we measure allocation performance.

Section 9 summarises how we consult with tenants and other service users in developing this policy.

Section 10 covers our procedure for dealing with appeals and complaints.

The appendices cover general issues, as well as additional policy information.

Section 2: Policy aims and objectives

2.1. General

This section explains what the allocation policy aims to achieve in practice.

These aims or principles are, therefore, very important as they set the **framework** within which our allocation services operate.

2.2. Allocation aims and objectives

In our allocation service, we are committed to:

- meeting legal and good practice standards;
- base our allocation practice on a comprehensive assessment of local housing needs and demand; this includes taking account of the local housing strategy;
- promoting equal opportunities, as well as ensuring that our practices do not discriminate unlawfully or unfairly;
- seeking to create sustainable and inclusive communities, that is, an area in which people want to live and work;
- making best use of our housing stock,
- working closely with Stirling Council to address housing need, for example, in addressing homelessness;
- allocating houses quickly to reduce lost rental income;
- providing housing list applicants with comprehensive advice and information about their housing options, as well as publicising the list widely;
- processing housing applications confidentially in line with data protection legal requirements;
- implementing quality training programmes that are ongoing for staff internally and externally to ensure effective policy implementation;
- dealing with appeals and complaints concerning this policy fairly;

- monitoring our performance through a system of performance indicators;
- reviewing policy on a regular basis in consultation with committee, staff, tenants, applicants, registered tenant organisations and other service users.

Note

The policy is generally reviewed every **three** years.

This may occur sooner if required, for instance, due to legal changes.

We publish any policy changes within **six** months.

Section 3: Legal and good practice framework

This section summarises the law relating to allocation practice and the good practice standards that we meet.

3.1. Legal framework

The law covering allocation practice is contained in the **Housing (Scotland) Act 1987**, as amended by the Housing (Scotland) Act 2001 and again by the Housing (Scotland) Act 2014.

These rules cover:

- admission to the housing list;
- groups to receive reasonable preference when allocating houses;
- things to ignore when allocating houses;
- information and publicity; and
- rights to access personal information.

Admission to the housing list

Any applicant aged **sixteen** years or more is entitled to be admitted to our housing list. In order to come onto the housing list, we arrange for applicants to complete our standard application form. We provide applicants with information about their housing options and also assist them to complete their application form, on request.

In line with our equality commitments, we also offer interpreting services, if needed and meet relevant costs.

Groups to receive reasonable preference when allocating houses

The law requires us to give reasonable preference to certain groups when letting houses. The groups to which we must give reasonable preference to when letting houses are:

- Homeless persons and persons threatened with homelessness with unmet housing need
- People who are living in unsatisfactory housing conditions with unmet housing needs
- Tenants of houses which are held by a social landlord and we consider them to be under-occupied as defined in this policy

We consider that a person has unmet housing needs if they have a need which is not capable of being met by their current housing circumstances.

In practice, we will explore housing options on request with all applicants so that they can make informed decisions regarding their housing preferences.

We also deal with other housing needs and the full list of needs addressed by this policy is detailed in section 4 and Appendix 1.

Things to ignore when allocating houses

In selecting tenants, we ignore the following matters:

- the length of time that applicants have lived in our area;
- any housing related debt that is not owed by the applicant, for example, rent arrears owed by a partner when the applicant was not the tenant;
- any non-housing related debt;
- where previous arrears of rent or service charges have been paid
- the applicants' age, provided the applicant is over 16 years of age or over, except for housing that is designed or specifically adapted for people of a certain age; and
- the income of the applicant and their family (including benefits).

We also disregard rent arrears if they are under one month's rent, although we ask applicants to repay such arrears.

If rent arrears are more than one month's rent, we disregard the arrear as long as applicants:

- have agreed an arrangement to repay the debt;
- have paid the agreed figure for at least **three** months; and
- continue to pay the agreed figure.

In law, we must also disregard whether or not an applicant lives in our area if she/he:

- is employed, or has been offered employment in our area;
- wants to move into our area to look for employment and we are satisfied that this is so;
- wants to move into our area to be close to a relative or carer;
- has special social or medical reasons for being re-housed in our area; and
- wants to live in our area to avoid harassment or the risk of domestic abuse.

Finally, we cannot impose any of the following conditions:

- that applications are to be active for a minimum period before considering applicants for housing;
- that the applicant gets a divorce or judicial separation;
- that the applicant gets a dissolution of a civil partnership or a decree of separation of civil partners and
- that applicants should no longer be living with another person before they are considered for housing.

Owners

Applications from owner occupiers will not be refused, however only owners falling under the following criteria (subject to proof being received) will be deemed to have a housing need:

- Where the property has not been let but the owner cannot access it; for example, the property is in such a poor condition that it cannot be lived in, due to, for example, severe structural faults; or where there are squatters living in the property
- Where occupying the property could lead to abuse, from someone still living in the property or from someone who used to live there
- Where occupying the property could endanger health and there are no reasonable steps that can be taken by the applicant to prevent this

Information and publicity

We provide all applicants with a summary leaflet of this policy; and applicants are given a copy of the full allocation policy, on request. We provide these documents free of charge and they can be downloaded from our website.

This leaflet explains in plain language (a) the range of housing needs that we address and (b) how we prioritise allocations.

We provide copies of our rules at various locations including:

- Our office
- Scottish Housing Regulator
- Council offices
- Offices of advice and information agencies
- Offices of other housing providers
- Forth's website

Rights to access personal information

Applicants are entitled under the Housing (Scotland) Act 1987 to view information that they provide in their application.

Applicants may also access personal information as allowed by the Data Protection Act 2018.

3.2. Good practice standards

We meet the regulatory standards specified by the Housing Regulator. These standards cover admission to the list, as well as allocation practices.

Section 4: Allocation system

This section covers the following issues:

- processing applications;
- selecting tenants; and
- our points system.

4.1. Processing applications

In order to be admitted to the waiting list we ask applicants to complete our standard application form.

This is available at our office, by post, by phone or on our website

We assess and acknowledge completed application forms within **ten** working days of receipt.

We send applicants written details of the status of their application, including their point award. Applications with insufficient information may be subject to delay. This means that applications cannot be processed until the relevant information is received or applications may be processed but not given the full points entitlement until the information is received.

Applicants may contact housing staff during office hours to discuss application details. For example, applicants may want to discuss their re-housing prospects.

We provide support services, as required, to ensure that our allocation services are accessible. For example, we may use interpreters (or signers) for hearing impaired applicants.

We process personal information on the application form in line with legal requirements. Thus, we will only share applicants' information with other agencies applicants consent, or if allowed in law without consent.

We may contact landlords or lenders (in the case of home owners) to confirm application details. For example, we may seek information about current or former tenancies. We will obtain applicants' consent before doing this.

In the case of applicants living in our area of operation, we carry out home visits to confirm application details. This is very important if we cannot obtain references that confirm household details.

In the case of applicants living out with our area of operation, we may ask other landlords and agencies to confirm application details.

These visits take place only at the point when an offer of housing is being considered.

We advise applicants of their right to apply for a joint tenancy. For those applicants who want to do so, we can provide them with information on the pros and cons of joint tenancies.

We review applications once a year. Each application is reviewed based on its date of registration.

We ask applicants to inform us within **fourteen** days if they want to remain on the housing list.

If we receive no response, we issue a reminder letter giving applicants a further **fourteen** days to inform us.

If we receive no response, we remove applications from our housing list.

We have inserted a clause in our standard application form to delete applications if no response is received.

Applicants can register at any time simply by completing a new application form.

4.2. Selecting tenants

This section explains the following issues:

- the type of allocation system that we use to select tenants;
- the housing needs that we meet, including a definition of need;
- making offers; and
- specific rules.

4.2.1. The type of allocation system that we use to select tenants

This section describes the **type** of allocation system that we use to select tenants. This system has been selected as it enables us to meet our policy objectives outlined in section 2. The system that we use is a groups plus points system.

(a) Groups plus points system explained

This system has three key elements.

Firstly, it involves having a select number of groups.

Secondly, applicants receive points for housing need and are placed in a relevant group.

Thirdly, an applicant's priority is determined, not simply by their level of points, but also by the priority given to the group.

Our points system and the targets of lets to each group is summarised in Appendix 1.

(b) Benefits of the groups plus points system

The main benefits of adopting this system are that it:

- allows us to address the range of housing needs contained in allocation law (the reasonable preference groups);
- enables us to identify changing levels of housing need and to alter targets accordingly; and
- enables a range of needs to be addressed thereby assisting us in achieving balanced and sustainable communities.

Note

The term "balanced communities" simply refers to having a wide range of households from different cultural and social backgrounds. Sustainable communities are achieved when areas are popular places to live and work.

4.2.2. The housing needs that we meet, including a definition of need

(a) Housing need defined

Housing need is a complex term that must be defined in relation to certain standards.

In this policy, housing need is defined against:

- **legal standards** that define homelessness and threatened homelessness, the tolerable standard and the overcrowded standard;
- **professional standards** such as our unsatisfactory housing conditions standard and our under-occupation standard;
- **social standards** that address applicants' preferences and choices, for example, applicants who want to live nearer relatives. This standard includes environmental and infrastructural issues such as social

isolation due to lack of transport or poor facilities; and

- **affordability standards** that relate to the ability of households to pay for current housing costs.

Note

We assess housing need on an ongoing basis through our Letting Plan. This Plan evaluates the numbers of applicants on our housing list, their preferences and the housing stock that is available to meet demand.

(b) The housing needs that we meet

Applicants with housing needs are given points for these needs and then their application is put into one of the relevant groups. Applicants with aspirational points are placed on the general list.

We have established **five** main groups as follows:

- referrals of applicants from Stirling Council (Section 5 referrals or nominations);
- the reasonable preference groups (three in total); and
- the general group.

The main rules concerning each group are explained below.

Group 1: Referrals of applicants from Stirling Council

We work closely with Stirling Council to prevent homelessness and to re-house applicants affected by homelessness referred to us by the council.

We also work with Stirling Council to re-house other referrals or nominations.

Details of this arrangement are explained in section 5.

Group 2: The reasonable preference groups

Group 2 contains the **three** reasonable groups as explained in section 3.

Each group is now explained below.

Note

The main Act that covers these legal issues is the Housing (Scotland) Act 1987 as amended by the Housing (Scotland) Act 2014

(A) People affected by homelessness and those threatened with homelessness

Homelessness is defined in law and applicants are assessed against this legal framework.

Applicants who are assessed as homeless persons as per the law (or threatened with homelessness) are considered under our allocation policy.

The term “threatened with homelessness” means being likely to become homeless within two months.

(B) Unsatisfactory Housing Conditions

The factors that we deem as meeting the unsatisfactory housing conditions standard are as follows:

1. Overcrowding, as defined in Part VII of the 1987 Act
2. Below tolerable standard, as defined by section 86 of the 1987 Act and amended by section 102 of the 2001 Act and section 11 of the Housing (Scotland) Act 2006
3. Harassment/abuse
4. Needing an adapted/accessible home

1.Overcrowding

The legal overcrowding standard includes the living room and bedrooms as being appropriate rooms for sleeping.

Our allocation policy standard excludes the living room when measuring overcrowding. The legal standard has the age limit set at ten years of age.

Our occupancy standard

Our occupancy standard defines what rooms people should expect, including the type of bedroom.

Each couple (that is, partners of the same or opposite sex) or single person applicant should have their own bedroom. This should be a double bedroom.

Children of the same gender under the age of 16 will share a double bedroom. Different genders at the age of 10 and over will have their own bedroom.

Applicants may request to move to accommodation that does not reduce overcrowding. We will consider such applications as it may address certain needs such as social needs.

This is important as people may not receive an offer of housing given the relative shortage of larger houses relative to demand. No points for overcrowding would, however, be awarded.

Applicants may require extra room due to medical circumstances. A points award may be made for overcrowding on this ground subject to a medical health assessment.

We take account of people who normally live in the house but are temporarily absent. For example, this might include family members working away, or people residing in institutions, including prison.

The size of accommodation let to couples living apart but who have shared custody will be made based on actual custody arrangement.

We award a set point figure for each bedroom needed.

We do not let houses to applicants if this were to cause statutory overcrowding.

2. Below tolerable standard

Housing does not meet the tolerable standard if it fails to meet any of the elements defined in law. For example, a house must be substantially free from rising or penetrating damp and must have a sink that has hot and cold water.

The application form contains these elements so that housing below the tolerable standard is clearly identified.

We award a fixed point award if a house fails to meet the standard.

In our policy, a house is deemed to include caravans and house boats.

3. Harassment/abuse

We are committed to addressing any form of harassment. Harassment can take many forms, including harassment on grounds such as age, disability,

race, sex and sexual orientation etc. We will signpost victims to other relevant services.

We have established a separate policy and procedure for dealing with all forms of harassment.

We are committed to enabling those experiencing abuse to address this through suitable housing. Abuse can take many forms and we aim to deal with each case sensitively and on an individual basis. We will signpost victims to other relevant services.

In cases of harassment/abuse, we award an applicant a fixed point award.

4.Adapted/accessible home

This applies to applicants who require to move to alternative accommodation due to medical related conditions; or to disabled people whose housing does not meet their accessibility needs.

Accessibility needs of individual applicants are assessed through a process of self-assessment. This is covered in detail in our internal procedures and applicants are advised of what they should do when providing information.

We award two levels of points depending on whether there are serious accessibility needs or other accessibility needs.

Each case is assessed on merit taking account of the individual's needs measured relative to the condition of their existing home.

(C) Under-occupancy

Reducing under-occupation helps landlords make the best use of housing stock. In assessing under-occupation, we use the same occupancy standards as for overcrowding.

Applicants may apply to move to housing that lessens present under-occupation even if their new house is under-occupied.

Under-occupation points are only available to social housing tenants and not owner occupiers or private rented tenants. When a tenant of another social landlord applies to us for housing, it is for us to decide whether the applicant is under-occupying in line with our definition of under-occupation.

In exceptional circumstances, we may offer incentives to our tenants to move out of an under-occupying situation if this will help us to make best use of our housing stock.

We award a fixed point for any tenant who is under-occupied

Group 3: General Group

This list is made of a range of needs that are not covered by the other groups, including applicants who prefer to live elsewhere. This is important as applicants may be in need for social or environmental reasons and these are not included in the legal framework.

The needs covered in this section include:

- insecurity of accommodation;
- applicants wanting to be nearer to specific facilities, namely workplace or educational or health facilities;
- applicants wanting to be nearer relatives or friends to provide or receive support;
- applicants seeking accommodation who are unable to afford present housing costs; and
- applicants sharing amenities, that is, a bathroom (including shared toilet) or kitchen; and
- applicants seeking accommodation for reasons of preference;
- no fixed abode

Notes

Applications from people living in insecure accommodation will be awarded points in this group. Insecurity of accommodation covers a range of situations, including applicants who:

- are leaving family/marital home following a relationship breakdown
- live with friends or relatives and have been asked to leave
- live in tied accommodation and the employment will end within 6 months or
- are in the armed forces with a confirmed discharge date within 6 months
- is a young person leaving care with support in place

Applicants living outwith Forth Housing Association's area of operation will only obtain points in this section if the facilities or support requirements are within the Forth Housing Association area of operation.

An applicant sharing amenities may include family members presently living with parents but who want to live on their own.

Tenants that we have allowed to sublet part of their home (or take in lodgers) are not awarded shared amenity points. Their subtenants or lodgers would, though, qualify for such points should they apply for housing.

4.2.3. Making offers

We offer housing based on the specific housing needs and preferences provided on our application form.

Examples of preference factors that we consider are as follows:

- area and street;
- type of house;
- floor level in the case of flats;
- amenity provision such as gardens; and
- internal amenities such as type of heating.

We will not, therefore, offer applicants housing that they do not request. This includes both house types and location.

We will make applicants two reasonable offers before considering suspending future offers. See section 6 for further information on suspensions.

We counsel applicants, however, on the question of realistic options as demand far outstrips supply of housing in certain areas. In order to ensure that applicants' expectations are realistic, we offer detailed information on the likely availability of houses in particular areas. This is based on re-let patterns that we monitor on an ongoing basis.

If a legal order such as an Antisocial Behaviour Order prohibits an applicant from moving to particular areas, we will suspend offers of housing to those areas.

4.2.4. General rules

Our general rules cover the following issues:

- housing stock that is specially designed or adapted to meet particular housing needs;
- allocating houses to committee members and employees;
- committee members' role in allocation policy development; and
- deciding priority if applicants have the same points.
- Exceptional circumstances

(a) Housing stock designed to meet particular needs

We reserve the allocation of specific houses to certain groups.

This housing covers the following needs:

Housing for wheelchair users. This type of housing is designed to meet the needs of people who use wheelchairs in their home. We will only consider households who have a permanent member who is, or who has a medical condition and they become a wheelchair user to occupy accommodation designed to this standard.

Supported Housing. Sometimes we may make arrangements with housing support agencies that specific houses should only be let to people with support needs that the agency will meet. We will only consider applicants with the type of needs the support agency can meet for these houses.

Amenity/Sheltered Housing. This housing is particularly designed for the needs of older people. We will firstly consider applicants who are, or who have a permanent household member who is suitable for this type of accommodation.

Bogside, Dunblane Housing. This housing was funded not by public funds but by funds from the Thomas Brittain Trust, which required funds to be utilised for the relief of those in need by reason of age and ill-health or disability or other disadvantage through the provision or assistance with the provision of sheltered housing or other accommodation within the geographical area of, and with preference to be given to residents living within, coming from or having a close connection with, the former Burgh of Dunblane and the Parish of Dunblane and Le Croft . We will allocate these homes in line with the Lettings Plan outlined at Appendix 2.

b) Allocating houses to committee members and employees

Committee members and employees applying for housing are considered using the rules of this policy. This also applies in the case of close relatives of committee members and employees.

We process such applications in line with Association policy and follow appropriate reporting procedures to our regulatory body, namely Housing Regulator.

(c) Committee members' role in allocation policy development

Committee members do not participate in the allocation of individual houses to applicants; this role is delegated to employees.

Committee members' role is restricted to the important strategic duties of developing the policy – based on staff guidance – and monitoring the implementation of that policy.

Committee members may also be requested to consider individual cases that are not covered by existing policy principles. In such cases, the decision should be aligned to the review of the allocation policy and the new principles incorporated into the new policy.

(d) Deciding priority if applicants have the same points

If applicants within the same group have the same points total, we base priority on the date of application.

(e) Exceptional circumstances

Points will be awarded where extreme circumstances apply to a particular case which is not covered elsewhere in the Allocations Policy. The Tenancy Services Manager must agree all exceptional circumstances before points can be awarded. An example could be where a person qualifies for succession of a tenancy but the house has adaptations not required by the applicant.

Section 5: Referrals from Stirling Council

We work in partnership with Stirling Council to address the various forms of housing need that can arise.

This partnership arrangement involves taking referrals of:

- people affected by homelessness; and
- other nominated applicants.

Section 6: Mutual exchanges

This section outlines our policy on mutual exchanges. This covers the following issues:

- tenant's right to exchange;
- reasons for refusing requests to exchange;
- time scale for processing applications; and
- appeals.

(a) Tenant's right to exchange

Scottish secure tenants may exchange their tenancy with any other Scottish secure tenant. An exchange means "swapping homes" with another tenant.

This may include exchanges with tenants of Forth Housing Association, or tenants of another landlord.

Tenants must first obtain our written consent before the exchange can go ahead.

We may only refuse our consent if we have reasonable grounds to do so.

(b) Reasons for refusing requests to exchange

We may only withhold consent if we have reasonable grounds for doing so.

We base our reasons for refusing applications using grounds set out in the **Housing (Scotland) Act 2001**, as well as other grounds that we deem to be reasonable.

It is stressed that each case is assessed on merit relating to the particular circumstances of each case.

The legal grounds that we may use to refuse exchange requests are summarised in plain language as follows:

- a legal Notice of Proceedings has been served on the tenant;

- an order for recovery of possession of the house has been made against the tenant;
- the landlord has provided the house as part of the tenant's employment;
- the house has been designed or adapted for occupation by someone with special needs and – after the exchange – the new tenant doesn't have such needs;
- the accommodation is larger than that needed by the tenant and the tenant's family, or is not suitable to their needs; and
- the exchange would result in statutory overcrowding.

Notes

This list is not exhaustive and there may be other grounds when it might be reasonable to refuse requests.

These grounds are dealt with in our staff procedures that accompany the exchange policy.

We will consider exchanges as reasonable if they meet our occupancy standards as detailed in this allocation policy.

(c) Timescale for processing applications

We must provide our written response to applications within **one month** of receiving applications.

If we fail to respond to applications within this time scale, we are deemed to have given consent.

If we refuse an exchange application, we must give reasons in writing.

This is required to enable tenants to appeal against our decision.

(d) Appeals

If we refuse an exchange application, tenants are entitled to appeal to the sheriff court.

We inform tenants of this right in our letters.

Section 7: Suspensions

7.1. General

This section explains those situations when we may withhold offers of housing to applicants.

This is referred to as “suspending application” throughout this section, although applications once registered remain on our housing list until their removal. For example, an applicant may request us to delete their application, or it may be removed at the re-registration stage with their consent.

We may suspend application for two main reasons, namely:

- suspensions due to an applicant’s conduct; and
- suspension on grounds of eligibility.

Each type of suspension is now explained.

(a) Suspensions due to an applicant’s conduct

We may suspend applications if an applicant is failing to meet the terms of tenancy. These terms are clearly specified in the tenancy agreement that tenants receive.

For example, we may suspend an application if the applicant is acting in a antisocial manner by causing a nuisance to other tenants.

(b) Suspensions on grounds of eligibility

We may suspend an application, too, if the applicant is not eligible because of the rules within the allocation policy.

For example, an applicant must generally have attained a certain age to qualify for sheltered housing.

7.2. Examples of suspended applications

This section summarises the situations that may result in an application being suspended.

Applications will normally be suspended for no more than **six** months.

Applicants may appeal any suspension that is imposed. Section 7.3. provides information on appeals.

Delayed applications

This is an application that cannot be processed as the applicant has not completed the application form details.

Deferred applications

This is an application that is presently inactive as the applicant only wants housing in the future. An example of this might be an applicant living with parents, or someone in the armed forces.

Suspensions on grounds of age

We may suspend applications on grounds of age if the housing in question is designed or adapted for people of a certain age.

Suspensions on grounds of housing debt

We may suspend applications if there is housing debt over a certain level.

Housing debt relates to rent arrears lawfully due, service charges and rechargeable repairs.

We will only apply suspensions if:

- the debt is more than **one** month's rent;
- an arrangement to repay the debt has not been kept to for at least **three** months; and
- payments are not continuing.

Suspensions on grounds of the legal status of applicants

We meet the relevant law concerning asylum seekers and other migrant workers in respect of their entitlement to register on the housing list. For example, an asylum seeker may register on our housing list provided she/he is sixteen or over, but we cannot offer housing until refugee status is achieved.

Suspensions on grounds of conduct

We may suspend applications due to the conduct of applicants. This is done to protect the interests of other tenants and residents.

Examples of circumstances where we may suspend an application due to conduct are noted below:

- Anti-social behaviour – applicants who have received a warning for serious ASB or where a live legal notice or ongoing legal action against them for ASB exists
- Provision of false or misleading information – applicants found guilty of this, as confirmed through a tenancy reference, or through investigation by Forth Housing Association
- Violence or verbal abuse towards Forth Housing Association staff – applicants found guilty of this
- Evicted tenants and/or abandoned tenancies – an applicant who has been evicted from a tenancy or abandoned a tenancy in the last 3 years

In deciding whether or not to suspend applications on conduct grounds, we consider **three** main factors:

- the nature and seriousness of the conduct;
- the likelihood of the conduct continuing in the new location; and
- other options, for example, could a Short Scottish Secure Tenancy be granted instead.

Note

A Short Scottish Secure Tenancy can only be granted in circumstances prescribed in law and is a form of tenancy with limited security of tenure.

Suspensions on grounds of refusing reasonable offers of accommodation

We may suspend applications due to an applicant refusing **two** reasonable offers.

This is a reasonable position as we only offer applicants houses in areas that they specifically request. Repeated failure to accept offers of housing requested may result in the Association facing rental loss so suspensions are used to stop this. Again, this is an important principle within our policy objectives.

Suspensions on grounds of legal orders

We may suspend applications if a live legal order is in existence that prohibits someone living in a particular area.

For example, such orders may apply in the case of matrimonial disputes, antisocial behaviour, and sex offenders.

7.3. Appeals

We will suspend applications for no longer than six months.

Applicants may appeal to our internal appeals committee.

Details of how to appeal are described in section 10.

Section 8: Performance management

We monitor this policy to ensure that policy objectives are implemented effectively.

We monitor quantitative and qualitative issues.

(a) Quantitative monitoring

This involves monitoring things by numbers and includes:

- new applications by number, including processing within time scales;
- number of applications reviewed and deleted;
- offers made and whether accepted or refused;

- reasons for offers being refused;
- allocations to each group by target;
- numbers of appeals and complaints and outcomes; and
- equality information to identify applications, offers and lets by reference to factors such as age, disability, ethnicity and gender.

(b) Qualitative monitoring

This involves monitoring the quality of services that we provide and includes:

- advice provision; and
- documentation attaining certain standards, for example, being in plain language.

We present information on allocation trends to the Management Committee on a **three monthly** basis.

We also provide general information on allocation trends to tenants and other service users through our newsletter.

Section 9: Consultation and policy review

9.1. General

We review the allocation policy every **three** years, or sooner if needed. For example, the allocation policy may need to be reviewed in the light of any changes in law.

We consult with tenants, applicants, Registered Tenant's Organisations and other service users on relevant policy proposals through our tenant participation strategy.

9.2. Methods of Review

The Housing Manager is responsible for initiating reviews and will organise detailed consultation of policy proposals with:

- the Management Committee;
- housing staff;
- tenants; and
- other service users such as housing list applicants.

Section 10: Appeals and complaints

This section summarises our appeals and complaints system; information on these procedures are available to applicants.

10.1. Appeals

Any applicant wanting to appeal against a decision taken in line with this policy should appeal in writing to the Director stating the grounds of their appeal. We can provide a standard appeal form, on request.

Appeals are considered by the Appeals Committee at the next appropriate meeting after the receipt of the appeal. This is subject to ratification by the Management Committee whose decision is final.

10.2. Complaints

Complaints are different from appeals. Any complaints are dealt with under our Complaint Policy.

For example, an applicant may complain if we don't:

- apply the allocation policy properly; or
- provide services in line with our published organisational standards.

We give tenants a copy of our complaints policy and procedure when they sign their tenancy agreement. We inform all applicants in our general information pack.

This information includes details about the Scottish Public Services Ombudsman; this agency deals with complaints involving failure to implement services properly (maladministration).

Applicants must use our internal complaints system before contacting the Ombudsman.

Appendix 1: Points table

The points table describes the present targets set for each group and then lists the needs factors for which we award points.

Group 1: Referrals of applicants from Stirling Council Target: 50%

Group 2: The reasonable preference groups

(a) People affected by homelessness and those threatened with homelessness Target: 15%

(b) Unsatisfactory housing conditions Target: 15%

(c) Under-occupancy Target: 10%

Group 3: The General Group Target: 10%

Points elements	
Homeless/threatened with homelessness	100
Unsatisfactory housing conditions	
• Overcrowding	30
• Below tolerable standard	30
• Harassment/abuse	30
• Need adapted/accessible home	40 or 20
Under-occupying	30
General	
• Insecurity of Tenure	30
• Proximity to facilities	10
• Proximity to support	10
• Unaffordable current housing costs	10
• Sharing amenities	20
• Preference	10
• No fixed abode	10
Exceptional circumstances	40

Appendix 2

Bogside Dunblane Lettings Plan

1 Introduction

The Bogside, Dunblane development was financed not with public grant funding but a combination of private finance raised by the Association and charitable funds from the former Thomas Brittain Trust. This Trust was established to manage the bequest of the late Thomas Brittain, who required that funds be used for a specific purpose. The Trust was wound up in June 2015 on the agreement of the Office of the Scottish Charities Regulator (OSCR) with the condition that funds be transferred to Forth Housing Association to be used in line with this purpose.

2 The purpose of the Trust funds

Thomas Brittain required that funds be used as follows:

For “The relief of those in need by reason of age and ill-health or disability or other disadvantage through the provision or assistance with the provision of sheltered housing or other accommodation within the geographical area of, and with preference to be given to residents living within, coming from or having a close connection with, the former Burgh of Dunblane and the Parish of Dunblane and Le Croft” (The Deed of Trust)

3 The aim of this Lettings Plan

This lettings plan outlines the special circumstances that will be applied to all lettings of homes in the Bogside, Dunblane d development.

4 Assessment of need, occupancy standards etc.

All aspects of priority assessment, allocation etc, apart from the assessment of local connection priority, will be assessed as per Forth’s standard allocations policy.

5 Local connection priority

When seeking to allocated properties within the development at Bogside, Dunblane preference will be given to residents within, coming from or having a close connection with, the former Burgh of Dunblane and the Parish of Dunblane and Le Cropt.

Priority will be given as follows:

- a) First preference will be given to applicants currently resident within the defined area, with properties being allocated to the applicant(s) with the highest points total in the selected grouping.
- b) Where no applicants fall into the above category, second preference will be given to applicants with immediate family currently resident within the defined area. Properties being allocated to the applicant(s) with the highest points total in the selected grouping.
- c) Where no applicants fall into either of the above categories, third preference will be given to applicants who formerly resided within the defined area. Properties being allocated to the applicant(s) with the highest points total in the selected grouping.
- d) Where no applicants fall into any of the above groupings properties will be allocated to other applicants, in line with Forth's standard procedures.