

ALLOCATIONS POLICY (SOCIAL HOUSING – GENERAL)

Classification: Strategic

Status: Approved

Policy Lead:	Director of Housing & Care Services
Date Approved:	May 2020
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Review Period:	3 years unless required earlier due to changes in the law, regulation, best practice or requirement of the Association

REFERENCE PAGE

Document Title:	Allocations Policy (Social Housing – General)
Aim:	To ensure the allocation of suitable housing to those with a clear and identifiable need and are able to secure housing within the communities where applicants wish to live.
Objective:	3 The Eildon Group will ensure the delivery of high quality, responsive and affordable housing and support services
Scope of Policy:	Customers
Nominated Officer:	Director of Housing & Care Services
Approval Source:	Board
Legal & Regulatory References:	<p>This policy is based on the principles set out in the Scottish Government’s “Social Housing Allocations in Scotland: A Practice Guide”, published February 2019.</p> <p>At a minimum we will comply with all relevant legislation including the following:</p> <ul style="list-style-type: none"> • Housing (Scotland) Act 2014, and a range of Statutory Guidance relating to allocations policies and procedures • Housing (Scotland) Acts 1987 and 2001 • The Homelessness etc. (Scotland) Act 2003 • Equalities Act 2010 • Human Rights Act 1998 • The Management of Offenders (Scotland) Act 2005
Procedural References:	<p>This policy has been considered alongside other Eildon policies including:</p> <ul style="list-style-type: none"> • Voids Management • Decant, Home Loss and Disturbance Policy • Tenancy Management Policy • Unacceptable Actions Policy • Short SSTA Policy • Rent Management Policy • Preventing and Responding to Domestic Abuse Policy
Consultation Completed:	Yes - Staff & customers
Risk Implications:	2- Existing policy, substantial revision
Equalities Assessment:	All Eildon policies and key documents are developed with the clear objective of ensuring that they do not discriminate against any person and have negative impacts for equality groups. We will always welcome comments on the impact of a policy on particular groups of people in respect of, but not limited to, age, disability, gender reassignment, race, religion, sex or sexual orientation, being pregnant or on maternity leave and children’s rights and wellbeing.
Accessibility:	Accessible electronically/online and in print. All documents can be translated and made available in audio, braille and large print versions upon request.

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1. INTRODUCTION

- 1.1. Eildon Housing Association is a Registered Social Landlord providing a wide range of affordable social housing for people in housing need throughout the Scottish Borders. We offer a range of housing types and sizes to meet the diverse needs of our customers across the communities we serve.
- 1.2. This policy relates to the application and allocations process for general needs tenancies, and supported housing for older people where we provide low level support to tenants. Separate arrangements are in place for our non-social housing such as Mid-Market tenancies, and for supported housing where care and support are an integral part of the tenancy, such as extra care housing for older people.
- 1.3. We also have a separate policy for the allocation of Eildon's garages.
- 1.4. Eildon's Tenancy Management Policy sets out the arrangements for when Eildon tenancies may transfer to members of the tenant's household through succession or assignment. It also details our approach to tenant requests to sublet their property or take in a lodger.
- 1.5. Further information on the above and access to the policies referenced, along with information on our different housing types, can be found on our website - www.eildon.org.uk, or by contacting us directly.

2. POLICY AIMS AND OBJECTIVES

- 2.1 Our allocations policy is designed to meet the following objectives: -
 - We seek to contribute to achieving stable and balanced communities.
 - We will collaborate with registered social landlords to maximise opportunities and choice for people seeking social housing within and out with the Scottish Borders
 - Meet our legal and regulatory obligations and support Scottish Borders Council through joint agreements to meet the needs of people who are homeless and at risk of homelessness.
 - Is fair, transparent, understandable and consistent on who can apply for housing and how we allocate tenancies.
 - Provide good quality information and advice to support applicants to make informed decisions relating to their housing need.
 - Make best use of our housing stock, whilst offering applicants choice as far as is possible.
 - We consider health and social factors and the capacity to improve an applicant and their household's quality of life.
 - Ensure the accommodation we offer is suitable for the housing need of applicants and their household.
 - We facilitate mobility for reasons of support and employment.

3. DATA PROTECTION

- 3.1 All information provided by applicants in relation to this policy will be treated as strictly confidential and not discussed with third parties without their permission.
- 3.2 We will ensure compliance with the Data Protection Act of 2018 and the General Data Protection (Regulation (EU) 2016/679), as well as any domestic laws subsequently enacted.
- 3.3 Applicants can access our Customer Fair Processing Notice on our website which sets out the personal data we process and why. The Customer Fair Processing Notice also gives applicants information on their rights in regard to the personal information we hold.
- 3.4 An applicant has the right to see any information we have stored on our records about him or her. We will respond to any request to view the information held on computer, or to have sight of any personal records maintained by Eildon.

4. HOUSING LIST - ACCESS AND ELIGIBILITY

- 4.1 Applicants can apply on their own, jointly with a partner, or with other people aged 16 years and over who live with them.
- 4.2 UK citizens who are aged 16 years or older are eligible to apply for housing. However there may be restrictions for UK citizens who lived abroad and are returning to live in the UK, as well as to people who have never lived in the UK previously. Where this applies we will provide personalised advice and assistance, based on the applicant's circumstances, in accordance with current immigration legislation and guidance.
- 4.3 Applicants from the European Economic Area (EEA) are eligible to apply for housing if they have been granted settled status under the EU Settlement Scheme, and are 'habitually resident' in the UK or have an EEA 'right to reside' that qualifies them to access social housing.
- 4.4 Any request to register on our housing list from applicants who are neither UK citizens and not EEA nationals living in the UK will be offered personalised advice and assistance, based on the applicant's circumstances, in accordance with current immigration legislation and guidance.
- 4.5 No restriction is placed on acceptance of applications due to ability to pay or property ownership.
- 4.6 The right to be admitted to the housing list differs from the right to be allocated a property.

- 4.7 Applicants can register for housing online via www.eildon.org.uk, or by completing a paper registration form. Help is available to anyone who has difficulty registering online or completing the form.
- 4.8 We will ensure information can be translated upon request and made available in different formats to meet the specific needs of applicants as required.
- 4.9 We will process all new applications within one working day, subject to having access to all relevant information. Applicants can begin applying for properties as soon as they are registered.

5. HOUSING OPTIONS ADVICE & SUPPORT

- 5.1 Each quarter we will publish information on our website relating to stock turnover, geographic location and bid history.
- 5.2 Personalised housing options advice will be offered to applicants who have been awarded Platinum Priority (see Section 6), at risk of homelessness (see Section 12), any other applicants who requests this service, or where assistance is required to discuss housing options available to widen opportunities.

6. ASSESSMENT OF NEED

- 6.1 To enable us to meet the objectives of this policy and ensure we support people in greatest housing need, we operate a priority pass system covering four priority groups - Platinum, Gold, Silver and Bronze.
- 6.2 All applicants will be encouraged to apply for priority to reflect their housing need. Only one priority pass will be awarded for one set of circumstances with the priority awarded based on the highest-level pass.
- 6.3 Where an applicant has been awarded a Gold, Silver or Bronze Priority Pass and have not placed a bid within 6 months of being awarded priority, a housing options review will be undertaken to determine if the Priority Pass should be retained. If the pass has not been used during the 6-month period when it could have been, then a review will take place which may result in the priority pass being withdrawn. If no suitable properties have been advertised or bids for suitable properties have not been successful, then the priority pass will automatically renew for a further 6 months.
- 6.4 In the case of the Platinum Priority Pass, these will be reviewed 3 months after priority has been awarded as part of a wider review of housing options, and every 3 months thereafter.

6.5 The table below summarises the priority groups and the level of priority awarded:

Priority Groups	Priority Pass Level			
	Platinum	Gold	Silver	Bronze
Statutory Homeless	✓			
Specified Critical Needs (Homeless Prevention)	✓			
Management Transfers including decants (Eildon tenants only)	✓			
Wheelchair and specially adapted housing	✓			
Health Assessment (Grade A, B or C)	✓ (A)		✓ (B)	✓ (C)
Overcrowding		✓		
Unsatisfactory Housing Conditions		✓		
Under-occupancy of social housing		✓		
Armed Forces Veterans		✓		
Prevention of Homelessness			✓	
Social, community and family support <ul style="list-style-type: none"> • Carer Support • Employment or Education 			✓	✓
Transfer with no priority need (Eildon tenants only)				✓

6.6 We operate two systems to allocate properties to applicants applying for social housing with Eildon – **Priority Housing List and Choice Based Lettings**

6.7 **Priority Housing List** – Applicants assessed as being in critical housing need will be placed on this list and will be awarded a Platinum Priority Pass. Applicants on this list will not be required to bid for properties. Instead they will be directly matched to an empty property which meets their health, housing and personal needs.

6.8 In order to assist with achieving a balanced mix of tenants needs across our new build developments, we will aim to ensure we have no more than 40% of allocations to applicants with Platinum Priority Passes, with the remainder of properties being advertised through choice-based lettings. Furthermore, for each of our new build developments we will consider if a local lettings plan is required which will take account of the needs of the current community and whether allocations should give preference to certain households groups, based on the property types and sizes.

6.9 **Choice Based Lettings** - Over 60% of our empty properties will be advertised to applicants registered on our Choice Based Lettings system. Each week we will advertise available properties on our website, social media and on occasion in local newspapers. Applicants can choose to place a bid for properties of their choice. We will provide information relating to the properties available, where they are located and proximity to local services to help applicants make an informed decision before they place a bid. When bidding closes, we will offer a tenancy to the applicant who requires that particular size and type of

accommodation with the highest level of priority pass and date when priority was awarded (see Section 16.7).

6.10 In assessing the type and size of housing required:

- Children who reside with their parents for 3 or more nights per week will be classed as permanent members of the household. Written confirmation of access arrangements will be required. This will include joint custody arrangements and access arrangements.
- Where an applicant is fostering, adopting or a kinship carer with residency, we will consider children to be permanently living with the household and where appropriate, will award a separate bedroom for each foster or adopted child/children based on the criteria set out in Section 9.1. Written confirmation of the arrangements from a local authority panel will be required.

7. PLATINUM PRIORITY PASS

7.1 Platinum Priority will be awarded based on the outcome of a housing options assessment. When Platinum Priority has been awarded, applications will be held on the Priority Housing List for the category their circumstances fall within, as follows:

- Statutory Homeless
- Specified Critical Needs (Homeless Prevention)
- Management Transfer (Eildon Tenants)
- Decants (Eildon Tenants)
- Wheelchair and Specially Adapted Properties
- “Grade A” Medical Priority (see Section 8)

7.2 Where a property meets the need of the top placed applicant on more than one category, consideration will be made on who will be offered the property on a “case per case” basis, taking account of the critical need of the applicant including health related issues, date when Platinum Priority was awarded, and stock turnover for the property type they require.

7.3 Statutory Homeless - Priority will be awarded to applicants assessed as statutory homeless and nominated for housing in accordance with the Section 5 Protocol in place with between Eildon and Scottish Borders Council (SBC).

7.4 We will work closely with SBC and the Scottish Borders Health and Social Care Partnership to deliver solutions to support homeless people to settle into permanent accommodation as quickly as possible and, where appropriate, to ensure a person centered support package is in place for applicants with complex needs at the start of their tenancy.

- 7.5 In accordance with the Section 5 Protocol, we will work with the local registered social landlords and SBC to agree an annual target of lets to homeless people. This will be published as part of our annual performance indicators and reported to our Board and customers on a quarterly basis.
- 7.6 Specified Critical Need (Homeless Prevention) – Priority will be awarded to applicants who have specific needs and are at serious risk of homelessness, to be supported to find settled accommodation and prevent homelessness occurring. These arrangements include (but not limited to) young care leavers, offenders managed through the Multi Agency Public Protection Arrangements (MAPPA), and people referred to us through Multi Agency Risk Assessment Conference (MARAC) arrangements where Eildon and SBC have joint protocols in place on how these applications will be managed.
- 7.7 Management Transfers - An Eildon tenant who has an urgent need to transfer to another Eildon property will be awarded Platinum Priority. Any such moves will require to be approved by a senior manager within the Housing Services Team and will be limited to addressing serious issues and making best use of our stock.
- 7.8 Decants - An Eildon tenant who has an urgent need to be decanted on a temporary or permanent basis to another Eildon property due to serious damage or the need to carry out major modernization works to their home will be awarded Platinum Priority. Eildon's Decant, Home Loss and Disturbance Policy contains fuller information on this issue.
- 7.9 Wheelchair and Specially Adapted Properties – We have a small number of properties located within our general housing developments which have been purposely built or adapted to meet the needs of wheelchair users and/or people with a disability. We will work with the Scottish Borders Health and Social Care Partnership to maximise opportunities for households in need of this specialist housing. Applicants assessed as requiring this type of property will be awarded Platinum Priority.

8. HEALTH NEEDS

8.1 We will ensure that all applications for medical priority are assessed in a fair and consistent manner. Within the Scottish Borders, the local registered social landlords operate a unified health assessment procedure whereby we share information to ensure applicants only complete one Health Assessment.

8.2 Priority is awarded on three levels - Platinum, Silver and Bronze and is graded as follows:

- **Platinum Priority (Grade A)** - Where an applicant has a health problem and is unable to return to their home, or unable to continue living in their own home because they would not be able to gain access to essential facilities unaided and/or they are at significant risk of doing so, or due to significant and enduring mental illness they are unable to return or continue to live in their current home and/or environment, and it is not practical to adapt their home to meet their needs.
- **Silver Priority (Grade B)** - Where an applicant has a health problem and is living at home and they are unable to gain access to essential facilities unaided, and/or they would be housebound because they could not get out of their home unaided, or their mental illness severely restricts their ability to continue to live in their current home and/or environment and it is not practical to adapt their home to meet their needs.
- **Bronze Priority (Grade C)** Where an applicant has a health problem and is living at home and becoming less able to access essential facilities unaided, and/or they are becoming less able to get out of their home unaided, or they are becoming less able to cope in their current home and/or environment due to their mental illness, and it is not practical to adapt their home to meet their needs.

9. OVERCROWDING

9.1 Where the required number of bed-spaces exceeds the number available, then overcrowding exists. All rooms in the existing accommodation which are bedrooms, and all persons living there, will be taken into account. Where a bedroom cannot accommodate two beds then it will be regarded as a single bedroom. Each person under the age 16 years and unborn children will count as one person.

9.2 In assessing whether a household is overcrowded, we will use the criteria set out at Section 16.1. Gold Priority will be awarded to applicants who meet the criteria and who are assessed as being overcrowded.

10. ARMED FORCES VETERANS

10.1 Applicants serving in the Armed Forces can apply one year before their date of discharge and one year after. Gold priority will be awarded to applicants serving in the Armed Forces who:

- Are currently serving with one of the recognised Ministry of Defence Armed Forces, with less than one full year to discharge
- Have been discharged from the Armed Forces within the last year of applying for housing and:
- Have completed at least a 3-year fixed term contract of one full tour of duty

10.2 Gold priority will also be awarded to the surviving spouse/partner or a non-dependent child aged 16 or older of a deceased Forces Personnel, who served in the armed forces within the past 12 months.

11. UNSATISFACTORY HOUSING

11.1 We will offer Gold Priority to applicants who live in accommodation which is assessed as being legally below the “tolerable standard” for healthy occupancy.

The property is lacking one or more of the following amenities:

- piped water supply, inside water supply,
- inside flushing toilet,
- hot water supply,
- cooking facilities,
- lack of adequate heating,
- fixed bath/shower

or, the property is in severe disrepair, and the property has been assessed by Scottish Borders Council to be below the ‘Tolerable Standard’ in accordance with current legislation.

12. UNDEROCCUPANCY

12.1 Underoccupancy occurs when a person or family do not use one or more of the bedrooms available to them within their Eildon tenancy, or a Scottish Secure or Short Scottish Secure tenancy held with another registered social landlord. We will support tenants to move to a smaller property where they under occupy it, and where they wish to move to a smaller property. In such cases we will award Gold Priority to facilitate a move.

13. PREVENTION OF HOMELESSNESS

13.1 We will award silver priority to applicants assessed by either Scottish Borders Council or ourselves as being threatened with homelessness. This includes (but not limited to):

- Applicants leaving tied accommodation due to no fault of their own;
- Applicants experiencing financial difficulties in making rent or mortgage payments within their current home;
- Relationship breakdown within the current family home

13.2 In assessing eligibility, we will require supporting evidence. All applicants will receive a personalised housing options advice either from Scottish Borders Council or ourselves to explore housing options.

14. SOCIAL, COMMUNITY AND FAMILY SUPPORT

14.1 We will award Silver Priority to applicants who have a specific need to live in one of our communities to provide ongoing practical and/or emotional support to close family members i.e. parents or children. In assessing eligibility for awarding priority, we will require supporting evidence from a health or social care practitioner, or another appropriate professional.

14.2 We will award Bronze Priority to applicants who have a specific need to live in one of our communities to access employment, or formal education at either Borders College or Heriot Watt University. In assessing eligibility for awarding priority, we will require supporting evidence from the applicant's new employer or educational establishment, as appropriate.

15. EILDON TENANTS WITH NO PRIORITY

15.1 We will award Bronze Priority to Eildon tenants who wish to move to another Eildon property but have no priority need to move. However, the following conditions apply before we will award Priority:

- Applicants must have held their current tenancy for at least 12 months
- The condition of the current tenancy for at least 12 months
- There must be no history of neighbour problems or anti-social behaviour issues in the preceding 3 years at the time of applications
- Where there is tenancy debt with Eildon, there must be a stable and acceptable repayment arrangement in place which has been maintained for a minimum of three months

16. ALLOCATION OF PROPERTIES

16.1 All Eildon housing is classified by bed-spaces required by the household from a single person upwards. Double bedrooms can only be occupied by two persons under the following circumstances:

- adult couples over the age of 16,
- children under the age of 10, of different sex
- children of same sex up to the age of 15

16.2 On occasion, applicants may require accommodation with a greater number of bed spaces and bedrooms than is available within their area of choice. Where this is identified, we will work with registered social landlords to consider the best options for the household. Where Eildon are the landlord of choice for the applicant, we may offer a tenancy which will reduce current overcrowding. However, in all circumstances, we will ensure occupancy of the new tenancy does not contravene the legal definition of overcrowding as set out in the Housing (Scotland) Act 1987.

16.3 Where an applicant is pregnant, the unborn child/children will be treated as a permanent member of the household on confirmation of pregnancy.

16.4 Eildon's supported housing for older people and elderly amenity housing is designed to meet the need of older people. As such we apply an age criterion of 60 years and above. Applicants below this age will not be considered for any empty properties unless we have decided to reduce the age as part of a local initiative.

16.5 Empty properties will be advertised weekly. The exceptions are

- Properties which will be let to applicants who have a Platinum Priority Pass
- New build properties which will have a different advertising cycle linked to when the development will be complete
- Properties which are located in an area where we have a Local Lettings Plan in place (see Section 21), or
- Properties where we have decided a sensitive let is required (see Section 20)

16.6 Applicants can choose to place a bid for properties of their choice, up to a maximum of 5 properties per week.

16.7 When allocating properties, we will consider the following:

- Best Use - The applicant/s who would make 'best use' of the property – for example, by using all the available bedrooms, or any adaptations will be considered first.
- If there is more than one applicant who would make 'best use' of the property, we will offer it to the person with the highest-level Priority Pass.
- If there is more than one person with the same level of Priority Pass, then the offer will go to the person with the earliest priority pass date.
- If there is more than one applicant with the same level and date of Priority Pass or if there is more than one applicant applying and no Priority Passes are being used, then the offer will go to the person with the longest registration date with Eildon.

16.8 Prior to making a formal offer of tenancy, a home visit will normally be undertaken to validate the information held and to discuss the potential offer.

16.9 Where an applicant has a current tenancy or has previously held a tenancy, we may, with the permission of the applicant, seek a reference from the present or previous landlord regarding the conduct of the tenancy when an offer of a tenancy is being considered.

16.10 On occasion we may bypass an applicant for a shortlisted property who would otherwise receive a provisional offer of tenancy. This may be due to new information being disclosed during a home visit or when a provisional offer is being discussed with the applicant. Where this action has been taken, we will discuss the reasons with the applicant and advise what additional information we require to enable an offer to be considered in the future.

16.11 The applicant will be invited to view the property before signing a tenancy agreement. An applicant will be given 3-days to respond to an offer of tenancy after which the offer may be withdrawn.

16.12 Should the applicant fail to view a property and is unable to provide a reasonable explanation for not viewing it, the offer will be withdrawn.

16.13 Where it has been identified that false or misleading information has been provided, and the offer has been made based on this false or misleading information, the offer of tenancy will be withdrawn and the application suspended for up to 6 months (see Section 17.6.1). Where it has been determined that an applicant provided false or misleading information and has been allocated a tenancy inappropriately based on this information, we will take legal action against the tenant which could result in eviction.

17. SUSPENDED REGISTRATIONS

- 17.1 A suspension is where Eildon decides that an application will be put on hold and an applicant will not be able to receive an offer of housing until certain circumstances have changed, conditions are met or a set period of time has passed. During any period of suspension, the applicant will remain registered on the list unless they ask to be removed.
- 17.2 We aim to keep registrations suspended to a minimum, to be clear about when they will apply and for how long. Signposting to independent advice will also be provided.
- 17.3 Any decision to suspend an application will be taken on the basis of available factual information, with a clearly documented audit trail. Any decision to suspend an application will be communicated in writing to the applicant, setting out who has made the decision, why the decision has been made, how long it will last, what action the applicant needs to take in order for the decision to be changed. Applicants will also be advised of their right of appeal against this decision.
- 17.4 **Outstanding Tenancy-Related Debt**
- 17.4.1 Registrations will be suspended if the applicant or a member of their household has tenancy related debt of more than one month of the annual amount, and there is no repayment agreement in place and being adhered to.
- 17.4.2 Where the applicant has been adhering to a previously agreed repayment arrangement for a period of three consecutive months or more, the registration will not be suspended.
- 17.4.3 Where there is confirmation that the arrears are a result of delays relating to welfare benefit payments, the registration will not be suspended.
- 17.4.4 Once the tenancy debt has been paid in full or a repayment arrangement has been entered into and maintained for a minimum of three months the suspension will be lifted.

17.5 Anti-Social Behaviour

17.5.1 We will impose a suspension where we have received documented evidence that an applicant or a member of their household have:

- acted in an anti-social manner or has been responsible for harassment in the vicinity of a property,
- caused extensive and deliberate damage to a current or previous tenanted property,
- used a house or allowing it to be used for immoral or illegal purposes (such as drug dealing, prostitution, fire raising)
- behaved in a threatening or violent way towards an Eildon staff member or third party acting on our behalf

17.5.2 Where we impose a suspension for anti-social behaviour the suspension will remain in place until the applicant has not acted in an anti- social manner for a period of up to 12 months from the incident/s depending on the nature and severity of the behaviour.

17.5.3 We will retain tenancy information for former tenants of Eildon where we had instigated legal action due to serious anti-social behaviour. This information will be retained for 5 years from the date the tenancy ended. Where we receive a housing application from a former Eildon tenant with this tenancy history within 5 years of their tenancy ending, we will automatically suspend their application in line with Section 17.5.2

17.6 False or Misleading Information

17.6.1 Applicants are required to declare on their application form that all information supplied is true and are asked to take care to submit accurate information about their circumstances. Where Eildon can demonstrate that an applicant has deliberately sought to distort or omit information to gain advantage will be suspended for up to 6 months. Any priority passes awarded will be reviewed and may be removed from the application, subject to approval by a senior manager within the Housing Services Team.

18. REFUSAL OF OFFERS

18.1 Applicants who refuse two reasonable offers of accommodation will have their application suspended for six months. Where the application has been awarded a Priority Pass, a review will be undertaken at the end of the suspension period to agree if the priority is still appropriate.

18.2 The only is where an applicant has been awarded a Platinum Priority Pass and refuses two reasonable offers. Where this occurs, the application will not be suspended but instead we will meet with the applicant, reassess their application and move their application to our Choice Based Lettings list.

19. CHANGE IN CIRCUMSTANCES

- 19.1 Changes in circumstances may result in the registration being placed on hold, pending verification or receipt of additional information required.

20. SENSITIVE LETS

- 20.1 Occasionally we may have an empty property where we will decide to allocate it out with this policy to address local housing management or other local issues to provide a sustainable solution for the applicant and surrounding neighbours. We will only take this action in exceptional circumstances and with the approval of a senior manager within the Housing Services Team.

21. LOCAL LETTINGS PLAN

- 21.1 We will on occasion consider the use of a Local Lettings Plan to address housing need within a specific community. This includes:
- areas of low demand where we wish to relax the allocation criteria in order to maximise bids;
 - flatted accommodation where we wish to reduce the number of households with children occupying properties in order to create a balanced mix of households;
 - areas where there are significant issues and concerns with anti-social or criminal behaviour
- 21.2 Across each new-build development we will consider whether a local lettings plan is required. The Local Lettings Plan will set out our approach to meeting specific local needs and to achieving a balanced mix of tenants, which may include preference to local applicants who live in and contribute to the local community. This would normally be applied for first lets only.
- 21.3 The introduction of a Local Lettings Plan will be approved by Eildon's Executive Team and published on our website and referenced when we advertise properties through our Choice Based Lettings system. The effectiveness of the Plan will be monitored on a regular basis and where no longer required, will be cease.

22. MUTUAL EXCHANGES

- 22.1 We encourage requests for mutual exchanges between Eildon tenants, and with tenants of other registered social housing landlords. We will not unreasonably refuse permission for a mutual exchange. Conditions regarding exchanges are detailed in the Eildon's Tenancy Management Policy.

- 22.2 We will Homeswapper (www.homeswapper.co.uk), a national mutual exchange scheme which allows our tenants to advertise their exchange online at no cost and identify potential exchange opportunities.
- 22.3 We will also support individuals who want to move to another local authority area by providing details of landlords in their areas of choice. We will also actively consider requests from other landlords throughout the UK to house applicants with high levels of housing need.

23. PERSONS CONNECTED TO EILDON

- 23.1 Any member of staff or their family (for example sister, stepbrother, cousin, uncle etc.) is entitled to apply for housing with Eildon. Our application form will ask applicants whether they work for Eildon, have a family member who works for us or if they are related to a member of our Board of Management. If the connection relates to a staff member, the member of staff concerned will not be involved in assessing any priority or allocating any property.
- 23.2 Where a relative of a staff or Board member is shortlisted for an offer of housing, a senior manager within the Housing Services Team, not involved in the shortlisting process, will review and verify the proposed allocation. Details of the allocation will be entered into our Payments and Benefits Register and reported to the Board at its next scheduled meeting. A full audit trail will be kept.

24. APPEALS AND COMPLAINTS

- 24.1 All applicants have the right to appeal against a decision relating to their application. This could relate to the level of priority awarded, where the applicant feels we have unfairly suspended their application, or where the applicants considers we have made an unreasonable offer of housing. Such appeals will be considered by a senior manager within the Housing Services Team, not connected with the original decision resulting in the appeal. All such appeals will be considered and responded to within 5 working days of the appeals being made.
- 24.2 If the applicant remains dissatisfied the appeal will be escalated to a more senior manager who will independently reassess the circumstances, and within 20 working days, in accordance with Stage 2 of Eildon's Complaints Procedure. Where applicants remain dissatisfied after conclusion of a Stage 2 review, they have the right to take their appeal to the Scottish Public Services Ombudsman for an independent review.

25. ANNUAL REVIEWS

- 25.1 We will review applications annually, on the anniversary of their housing registration, to ensure the information held by Eildon is still relevant and up to date. If the applicant fails to respond to this contact, we will make contact one

further time. If there is no response, we will cancel the application and remove the registration from our housing list.

26. CANCELLED APPLICATIONS

26.1 We will cancel applications in the following circumstances:

- Where an application requests a cancellation of their application;
- The death of the applicant;
- Where the applicant repeatedly fails to respond to the annual review or other requests for information relating to their housing application.

27. MEASURING PERFORMANCE

27.1 It is the role of the Board to oversee the allocations function of Eildon and to set, monitor and review the policy's aims and objectives.

27.2 In addition, senior managers will monitor feedback from customers on the operation of the policy, and consider on a quarterly basis:

- Number of applications;
- Bids, refusals and lets across each Priority Groups
- Number and reasons for suspensions, bypasses and sensitive lets
- Complaints and appeals
- Effectiveness of Local Lettings Plans

28. REVIEW

28.1 We will review this policy every three years or earlier due to changes in the law, regulation, best practice or requirements of Eildon.