



Allocations Policy

2024 - 2027

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Manual Version Control

Version	Date	Change Description
1.0	2012	Allocations Policy and Procedure
2.0	May 2016	Revised
3.0	November 2017	Revised
4.0	May 2019	Revised
5.0	July 2020	Revised – main points of change are: Page 2 the Objects have been amended to mirror those within the new governing Scheme for PFH dated 29 June 2020, which have been amended and widened. Pages 4,5 and 6 show the changes to the governing Scheme in relation to the waiting list and also details who PFH can allocate to re the charities numbered “1”, “2” and “3”. Pages 11 and 12 – areas of welfare reform have been amended and updated.
6.0	June 2021	Fundamental review – see front sheet report
7.0	November 2022	Fundamental review – incorporates internal transfer allocations and a review of Asset/capital Limit.
7.1	May 2023	Changes made to asset limit, approved by Board May 2023.

7.2	November 2023	Inclusion of Mutual Exchanges, rehousing of Non-Dependents in RPL schemes, and the temporary closure of waiting lists. (Sections 6, 9 and 12)
7.3	September 2024	Inclusion of LA nomination agreements, appeals, rule against commercial use of sold properties, transparency of assessment/points process, non-dependent status. Reduced frequency of reviews to 2 years unless material changes required

1 Objects of the Allocation Policy

- 1.1 Pickering and Ferens Homes' (PFH) primary objective is to provide good quality and affordable accommodation and services mainly to older people.
- 1.2 The objects of the charity are:
 - (a) the provision of temporary or permanent housing accommodation for the beneficiaries (residents); and
 - (b) such charitable purposes for the benefit of the beneficiaries as the Board decide, including but not limited to the provision of health and social care and wellbeing activity to improve their quality of life, the relief of financial hardship, sickness and poor health amongst them, and the provision of specially designed or adapted housing, and items services or facilities calculated to relieve their needs.
- 1.3 The Allocations Policy aims to ensure that access to housing is based on the above objects of the charitable scheme. The PFH Board have determined that our homes should be allocated, in the main, to people over the age of 60. In some cases we can accept people over 50 as applicants for certain areas.
- 1.4 Applications for rehousing may be received from both internal and external applicants.
- 1.5 Within the bounds of PFH's Charity Commission Scheme of June 2021, PFH will co-operate with the local authority's strategic housing functions by assisting the LA to fulfil their duties to meet identified local housing need. PFH will ensure that existing nominations agreements are adhered to, as well as seeking ad-hoc nominations for schemes with no agreement; this may include seeking nominations for our disabled adapted stock to ensure that adapted properties are utilised by those in need of them. We will meet regularly with LA partners to ensure that processes and agreements are being adhered to and fit for purpose.

2. Charity Commission Scheme – Beneficiaries

- 2.1 The Board have the discretion to allocate accommodation to the future beneficiaries of the Association. The criteria in respect of the allocation of accommodation to future beneficiaries are found in the Scheme dated 29 June 2020 and are as follows: -
 - People in need by reason of age, ill- health, disability, financial hardship or other disadvantage; with
 - Priority given to those who were either born or are resident in the city of Kingston upon Hull and the East Riding of Yorkshire.
- 2.2 There are several exceptions to the above criteria, to preserve the legacy of the former Almshouse charities that are now within the PFH portfolio:
 - For Joseph Hornby Stockdale Almshouses applicants must meet the above criteria and have resided in the Parish of Hornsea for 2 years.
 - For Mrs D.L Richardson's Almshouses applicants must meet the above criteria and reside in the (former) County of Humberside or the counties of West Yorkshire, North Yorkshire, or South Yorkshire with a preference in respect of the appointment of Beneficiaries to MRC's Almshouses that are situated in Bridlington being given to residents currently in Bridlington.

- 2.3 In all cases the Board may, in exceptional circumstances, appoint a resident who lives outside of the area of benefit of the relevant charity, but is otherwise qualified. However, such appointments must make up no more than a third of the overall scheme and be recorded.
- 2.4 PFH can apply discretion to allocate to future beneficiaries (residents) dependent upon: -
a) the suitability of the applicant to be considered for the accommodation,
b) the requirements of the charitable scheme
- 2.5 As detailed in 6.1, when making an application, high-demand area lists may be closed and therefore applicants will be unable to apply for them. This ensures that applicants can only apply if they have realistic expectations of timely rehousing with PFH in their chosen areas. The assessment process affords applicants a different priority for different schemes, depending on the demand for that scheme.
- 2.6 General criteria for eligibility for applicants also apply. Applications will not be considered where the applicant has assets or capital combined worth over £235,000. Applicants who own their own homes will be asked to provide a valuation of their property and details of any other assets or capital as part of their application. However, where an existing applicant's assets and capital combined increase to over £235k whilst on the waiting list this will not affect their application.
- 2.7 In order to comply with our charitable aims, those who own their home at the time of applying will be expected to sell the property if rehoused with PFH. When rehoused, the property should not be used for any commercial purpose, for example, renting the property out and gaining an income from the rent, or otherwise use the property for commercial purposes.
- 2.8 A review of the asset and capital limit and the allocations policy will take place every two years, and the formula for setting a new limit will be to assess the average selling prices in the areas PFH operate (Hull and also the East Riding) and apply a percentage increase or decrease to the existing asset limit.

3 Equal Opportunity – Fair access to homes and services

- 3.1 As a social housing provider, it is important that our homes are available to all eligible people in the communities in which we work. PFH commits itself to fairness and equality for all, operating with professionalism, integrity and openness, and a belief that everyone is entitled to be treated with dignity, respect, and fairness. PFH will operate within equality legislation and regulation.
- 3.2 We recognise that some of our applicants may experience disadvantage and therefore require extra support. For example, we can offer interpretation and translation service, wheelchair accessible meeting spaces, information in a range of formats and home visits where required.
- 3.3 Allocations will be made to future beneficiaries (residents) in accordance with the governing Charity Commission Scheme.
- 3.4 PFH also works in partnership with the other organisations, including local Councils, to try to meet the housing needs of older persons in the communities in which we work. We follow the nomination protocols agreed with each Council for both newbuild and existing stock. We will also support emergency housing situations where serious need arises and an applicant is a risk of harm.

4 Types of Housing Provided

4.1 PFH currently provide three different types of housing:

- General Retirement Housing – with no communal facilities
- General Retirement Housing – with external communal facilities
- PFH Plus Retirement Housing – (sheltered housing) with internal communal facilities.

4.2 General Retirement Housing – no communal facilities – designed to meet the requirements of people aged 60 and over, however where operational difficulties such as low demand exist the minimum age restriction is reduced to 50 and over. All properties are equipped with PFH Connect, a pro-active wellbeing and communications service. In addition, Smart Hub technology (telecare) is provided as a condition of the Licence to all properties on a needs basis. The telecare solution offers 24-hour emergency assistance as well as the ability to report out of hours repairs. There are no communal facilities or on-site staff available. This type of housing comprises self-contained bungalows, apartments and adapted bungalows

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4.4 PFH Plus (PFH+) – designed to meet the requirements of people aged 60 and over. Each scheme receives the services of a Scheme Manager who oversees site health and safety, provides housing related support to residents and a range of wellbeing activities. This type of accommodation is mainly in apartments with a lift facility. A limited number of properties are provided for residents in wheelchairs. Where a resident has a particular personal or health care need the statutory health and or social services teams will assess their requirements and make arrangements for meeting these needs. PFH will where possible act as advocate for the residents to help facilitate these arrangements. Properties are equipped with Communicall technology (telecare) and also benefit from the PFH Connect device, a pro-active wellbeing and communications service as a condition of the Licence.

4.5 All the above properties are designed as far as possible to enable our residents to live as independently as possible. PFH offers an aids and adaptations service to eligible residents. When allocating a home to applicants we may need to be sensitive to their circumstances to ensure that wherever possible the resident community is sustainable.

5 Tenure

5.1 PFH is an Almshouse charity and any home provided under this allocations policy is provided via a Letter of Appointment (Licence).

6 Access to the Waiting List

- 6.1 As stated in earlier sections, the governing instrument of PFH is the most recent version of the Charity Commission Scheme , as amended from time to time.
- 6.2 In accordance with the above-mentioned scheme, the Board can delegate the allocation of accommodation to the employees of the Charity. Therefore, access to the waiting list is through a central waiting list system and subject to set criteria.
- 6.3 Both internal applicants (existing PFH residents) and external applicants may apply for housing subject to meeting the requirements of the Charity Commission Scheme.
- 6.4 An application can be made via PFH's customer portal . Applications may be made on behalf of an applicant (with their consent), and PFH will offer assistance in completing applications for anyone who is unable to make an application in this way.
- 6.5 Internal or external applicants who have successfully participated in the Try Before You Apply (TBYA) scheme will be awarded additional points in order to award a level of priority. This applies to PFH Plus accommodation only.
- 6.6 Decant moves fall outside of the standard allocations policy and shall be used if the association requires vacant possession for major works, refurbishment works or plans to dispose of the asset. Please refer to the Charity Commission Scheme and the Letter of Appointment.

7. Closure of Waiting Lists

- 7.1 PFH operates a system whereby within one main waiting list, there are different lists for each area, property type, number of bedrooms and bathing facilities required within the areas. This enables PFH to match the applicant and property according to the applicant's needs. Lists are drilled down further depending on the bathing facilities the applicant needs.
- 7.2 Many of PFH's schemes are in high demand and as a result, vastly oversubscribed, therefore the vast majority of applicants on these lists are unlikely to be rehoused.
- 7.3 PFH reserve the right to close its waiting list for specific areas, property types, or entirely on a temporary basis, subject to demand. Decisions around closing the waiting list will be taken by the Senior Leadership Team and reviewed at least every six months.
- 7.2 Appropriate controls ensure that applicants requiring urgent rehousing, or those seeking PFH accommodation in lower demand areas, are not adversely affected and therefore, these lists will remain open. The controls detailed in Appendix 6 show the rationale behind considering the closure of a waiting list.

8 Internal Transfers and Decants

- 8.1 Internal and external applications are assessed using largely the same criteria based on health and social circumstances and current housing circumstances and priority is given to those who appear at the top of match lists when a vacancy arises (i.e. those with the highest points).
- 8.2 In the event of properties needing extensive refurbishment, or the property is severely damaged, PFH may decant a resident into another PFH property, either on a temporary or permanent basis. Whilst there is no obligation for PFH to provide home loss payments due to its exempt status as an Almshouse charity, PFH may in some circumstances provide such residents with disturbance payments to help cover the costs of moving.

8.3 There are exceptions to how internal applicants are assessed. Internal applicants may also fall within one of the following categories, which would give them automatic priority status:

a) Fire Safety in PFH Plus Schemes

For the safety of our residents and in order to meet fire safety regulations, it is necessary for PFH to provide residents with a low-risk, safe means of evacuation in the event of a fire or other emergency. In line with guidance from the fire service and our fire risk audits, residents of PFH Plus schemes living in upper floors, or those who are an unmanageable distance from fire exits and therefore unable to self-evacuate, have the option to move to a ground floor PFH Plus apartment, or an PFH Plus apartment closer to a fire exit.

For the sake of systems audit, it is necessary to assign 150 points in order for an applicant's priority to be demonstrated on a match list.

b) Urgent Management Transfers

- i) In some circumstances, PFH will consider a Management Transfer for cases which may fall outside of routine assessments and are deemed urgent. This route may be taken in cases where the internal applicant can demonstrate that their needs are severe or urgent, and their current home is having a significant detrimental impact on their physical or mental health.
- i) In such cases, the [Urgent Management Transfer Recommendation form](#) should be completed by the Area Coordinator, and submitted to the Director of Home Services for approval. Cases must meet one of the below criteria:
- severe anti-social behaviour, including actual or threats of violence, harassment or hate incidents where the resident is significantly and demonstrably threatened
 - If there is a safeguarding issue which puts the resident at significant physical, mental, financial or other risk (evidence must be provided to support the management transfer report)
 - where the resident's property is unfit for occupation as a result of fire, flood or on the recommendation of a Property Services Manager that the resident needs to move so that essential repairs can be carried out and completed
 - where there are urgent social reasons, for example the applicant's current circumstances are having a significant and impact on their mental health and no other suitable options are available and where a move would wholly or partially address these issues (supporting letters from health or social care professionals must be provided)
 - where there are urgent medical reasons, for example a significant decline in the applicant's physical health means that their current home or parts of their home are no longer manageable or accessible and a move would wholly or partially address these issues. Supporting letters from health care professionals must be provided)
 - there is an immediate high risk of injury or death if the resident / family remain in their current accommodation, (for example, domestic abuse), or
 - there is an immediate high risk of family breakdown or there are significant risks to mental or physical health if they remain in their current accommodation.
- ii) Particular attention should be paid to confirming the details and reason for the transfer application; evidence of incidents, the affect that the circumstances have had on the resident, the effect of the housing circumstances on any medical conditions and assessing the risk posed to the resident by these circumstances.

- iii) All urgent cases should (where possible) be supported by the appropriate agencies; Police, Health services, Social Services, Anti-Social Behaviour team, Safeguarding team, mental health teams, GP and any other agencies involved. Where an urgent transfer is being considered and there has been severe harassment or violence/threats of violence, it is expected that the agencies involved and PFH consider the new accommodation suitable and safe. An area will not be considered safe if it is likely that harassment will continue. PFH will also reserve the right to refuse to rehouse a transfer applicant to areas that it does not consider to be safe or suitable.
- iv) Management Transfers should be rehoused within one month of the status being awarded wherever possible, subject to the availability of suitable accommodation.
- v) In most situations the rehousing of applicants awarded an Urgent Management Transfer will be on a permanent basis, however if it is not possible to find a suitable permanent property e.g. a property of a suitable size in the right area is not available in a reasonable timescale or if it is demonstrably not safe for the resident to remain in their present accommodation it may be necessary to rehouse a resident in temporary accommodation pending a more suitable property becoming available or in some circumstances until they can return to their own home.

8.4 Applicants who fall within 8.3a) or 8.3b) are awarded additional points to ensure they appear at the top of the waiting list. It is necessary to award points so that applications can be identified through their priority and ensure that our systems recognise their application when a shortlist is produced.

8.5 There may be the circumstance whereby there is more than one applicant from each of these lists being considered for one vacancy, and all may have the same or similar points. In this event, priority status should be applied as below.

- Fire Safety in PFH+ (Priority Status 1) (150 points)
- Management Move (Priority Status 2) (150 points)

9) **Mutual Exchanges**

9.1 Both internal and external applicants may wish to apply for a Mutual Exchange. Applications from those wishing to swap properties may be received from both internal and external applicants, for example between a PFH resident with a non-PFH resident, or when both applicants are PFH residents. Whilst the full assessment and pointing process would not be required under a mutual exchange, external applicants would be required to meet the basic pre-eligibility requirements, which include meeting the age threshold, whether they live in or were born in Hull or the East Riding, and meeting the asset limit requirements. They would also be required to provide a satisfactory landlord reference and/or complete the Applicant Declaration form.

9.2 Licensees exchanging with an internal or external applicant may not assign their licence to the person they are exchanging with, however PFH will work within the spirit of mutual exchanges by enabling them to be carried out as a new allocation and will require the same scrutiny of applications and ultimately the provision of a new licence to each party. Therefore, subject to the applicant meeting the necessary requirements, they will be provided with a new licence which relates specifically to them and the home they are moving to.

9.3 Transfer requests that are not covered by the Transfer criteria will be advised about swapping their homes and supported in applying to HomeSwapper for a Mutual Exchange. In addition,

anyone applying for accommodation will be advised of the option to mutually exchange as an alternative, or in addition to, applying for housing direct with PFH.

9.4 The availability of Mutual Exchange services will be further publicised as part of our on-going marketing plan and information about Mutual Exchanges is available on the website.

9.4 HomeSwapper

9.5 HomeSwapper is a mutual exchange service and is an alternative option for residents looking to move home. Residents of PFH are able to use this service free of charge to help them find a new home. A mutual exchange may offer an alternative to an internal transfer to find a new home.

9.6 HomeSwapper is easy to use and automatically matches residents/tenants who are interested in the applicant's home and have a home that the applicant may be interested in.

9.7 Applicants need to register at www.homeswapper.co.uk then, once the registration has been approved by PFH the applicant will be able to access information about residents/tenants who may wish to exchange properties. HomeSwapper may e-mail the applicant at regular intervals with details of suitable exchange partners. If the applicant does not have access to the internet then HomeSwapper will send match alerts via their mobile phone every two weeks.

9.8 If the applicant does not have a computer at home then there are other ways to register and access the HomeSwapper website such as:-

- All PFH + schemes have free internet access available to all of our residents; residents may ask PFH staff for help,
- Family / Friends,
- Local Libraries will also often have internet access available to the public, as well as internet cafes.

9.9 Once the applicant has found someone they want to mutually exchange with then HomeSwapper will send an alert to PFH, which will then review and authorise/reject the exchange.

9.10 With non-PFH residents, the AC will undertake checks to ensure their eligibility and obtain documentation to demonstrate the individual's 'Right to Rent'. All external applicants must qualify for accommodation with PFH as per the Allocations Policy and complete a landlord reference, or an Applicant Declaration form.

9.11 Applicants must NOT exchange properties until PFH have provided consent via HomeSwapper and agreed when the exchange can take place. Standard/required compliance checks must take place on the day of the move.

9.12 Please note – we will maintain the structure and fittings of the property under the terms of the Licence. However residents who exchange accept the property 'as seen'. Any damage caused by the outgoing resident becomes the responsibility of the incoming resident, who is liable to either carry out or pay for the repair.

10) **Making an application**

10.1 Applications are made through a digital application form. This allows the applicant to provide the information required in their own time and consider their options. They are also able to

attach their 'proofs' (Right to Rent, etc) to their application. Those that are unable to, or do not have family to help with an on-line application, will be supported by PFH team members.

- 10.2 When making the application, there is information on the portal to ensure applicants are informed about how our waiting list and allocations processes work, and how the applicant's individual circumstances are considered before applying points.
- 10.3 Applications completed via the portal will not show the applicant what points are awarded for each category. Before being made 'live' on the waiting list, applications will be assessed by the Waiting List Coordinator (WLC) to ensure that there are no errors and that responses to questions are accurately assessed. The WLC will also ensure that the required proofs support the application.
- 10.4 As part of the application process, applicants are advised of the documentation which they need to provide in order to verify their eligibility for rehousing with PFH and also their 'Right to Rent'. Applications will not be made 'live' until all required documentation is in place. We will chase outstanding proofs via the applicant's chosen communication preferences and advise the applicant of this at least twice over a period of four weeks before cancelling the application.

11 Assessing and prioritising applications

- 11.1 Properties are allocated to applicants using a points system which helps us to identify the applicant's needs.
- 11.2 Points are not awarded for care needs; however, an applicant's overall needs will form part of the assessment process. PFH will, when necessary, liaise closely with health and social services. Applicants who have high care and support needs may not be offered housing with us unless a long-term care package is in place.
- 11.3 When assessing an application, particular attention is given to how the applicant's current accommodation may be detrimental to their day-to-day life, and in turn, what accommodation may best suit their current and future needs, and why.
- 11.3 PFH reserves the right to award discretionary points of up to 100 in exceptional circumstances only. This would require the approval of the Resident Services Manager and a note must be added to the record detailing the rationale/justification as to why the additional points have been awarded. This may apply, for example, in the event of an upheld complaint or other circumstances where awarding additional points is the only reasonable alternative to a situation that cannot otherwise be resolved.
- 11.3 When completing the digital form, if all area lists are open, applicants may still receive a pop-up notification if they are requesting areas which are in high demand, so that they are aware that the likelihood of rehousing in such areas is much lower than some other areas.
- 11.4 We require applicants to provide information to evidence their current financial and housing circumstances, their immigration status to verify their "Right to Rent", and references from previous landlords, if applicable.
- 11.5 We will support applicants by assessing their affordability, and their eligibility to welfare benefits if necessary or requested. We will also consider if under occupation or universal credit issues will affect the applicant. PFH reserve the right not to accept an applicant onto the waiting list if the landlord reference, Applicant Declaration, affordability check or any other information suggests that the applicant will not be able to afford the WMC or otherwise sustain

their Licence. If the applicant has significant existing arrears, applications may be reconsidered if a repayment plan or consolidated debt arrangement is in place for at least 6 months (or until the debt is cleared if sooner) which has been adhered to consistently.

- 11.6 Where an applicant advises us that they do not want PFH to contact their landlord in advance of being considered for accommodation or they are otherwise unable to provide a reference, or they do not rent their home, applicants will be required to complete the 'Applicant Declaration'. Please see Appendix 3.
- 11.7 In some circumstances, for example, where the application process has raised concern about the applicant's suitability as a PFH resident, PFH reserves the right to insist on landlord references (if the applicant rents their home) or any other supporting information deemed appropriate to make a judgement.
- 11.8 If an unsatisfactory reference is received or the reference raises concerns about the applicant's suitability as a PFH resident due to risks which cannot be adequately mitigated, PFH reserves the right to refuse their application for rehousing. Please also see section 13 'Sensitive Allocations'.
- 11.9 Due to the daily changing of the make-up of waiting lists, PFH will advise the applicant of their points total and what points have been awarded for, however it does not routinely advise applicants of their position on the waiting lists they have been added to. This is to help manage applicant's expectations of rehousing and prevent information being given about their position on the list which could be misleading. This is because new applications are added every day, applications are cancelled, and the circumstances of applicants are updated. These changes affect the number of people on the list and applicant's points, resulting in the position of applicants on the lists changing on a daily basis. For example, an applicant with 200 points today may show as the top of the list for one area, however if the list is run a day later they may be further down on the waiting list.
- 11.10 PFH recognise however that it is important to be transparent with applicants regarding their chances of rehousing, and responsibly manage expectations by not placing new applicants onto lists which are vastly oversubscribed. Therefore, very high demand areas are closed to new applications, however applicants can still choose from a list of shorter-wait properties. Applicants are also provided with the details of other RSL's which operate in the area.
- 11.11 Frequently Asked Questions, which explain how applications are assessed and prioritised, as well as what happens when a vacancy arises, are included within the application area of PFH's customer portal.

12 Sensitive Allocations

- 12.1 To promote social inclusion and create a mixed and balanced community and take account of the health and safety needs of applicants it is important for PFH to allocate appropriately and sometimes sensitively. 'Sensitive' allocations are used only in exceptional circumstances where we need to consider the suitability of the applicant for the vacancy. This will be based on legitimate information we have about the applicant and where applicable on our knowledge of the property, its location, or neighbours.
- 12.2 We will make sure that all decisions on sensitive lettings are accountable, transparent, and monitored. As there are many situations that may be sensitive, discretion will have to be used when identifying sensitive let applicants, however examples of sensitive allocations would be:

- 12.3 PFH reserve the right not to accept an applicant onto the waiting list if PFH is made aware of their involvement in inappropriate behaviour including vexatious behaviour, is or was the subject of ASB, caused wilful damage to property, if a current or spent conviction is deemed to cause significant risk to residents or their visitors, or if they are in arrears which they have made no attempt to pay. PFH may consider applicants with arrears where there is an agreement in place which has been maintained for at least six months or paid in full.
- 12.4 Serious offenders and Anti-Social Behaviour
- 12.5 At the time of registration all applicants are asked if they or anyone residing with them has a conviction of a criminal offence. Under the Anti-Social Behaviour, Crime and Policing Act 2014 they are asked whether they have been subject to a Criminal Behaviour Order (CBO) or an Injunction to Prevent Nuisance and Annoyance (IPNA), or a Community Resolution such as agreeing to restorative justice, signing an Acceptable Behaviour Contract, or attending a neighbourhood justice panel for restorative justice.
- 12.6 Applicants must also declare if they have any spent or unspent convictions so that PFH can appropriately assess where and if the applicant can be rehoused. If this is the case, permission will be sought from the applicant to contact the Police and/or Probation Service for further information. We will assess each case individually taking personal circumstances and risk into account before making a decision on whether the applicant can be accepted on to the waiting list or be rehoused.
- 12.7 In circumstances where an applicant has been convicted of a community offence(s) (such as burglary, aggravated burglary, drug dealing (from their home), sexual offences) or has been involved with serious anti-social behaviour such as use of threats of violence to persons or any type of harassment to persons or any type of anti-social behaviour, we will assess the risk as follows:
- i) We will work the police, probation service and support workers to understand the level of risk and the on-going support which they will be providing to the applicant/resident. We will ask them to provide us with their views on appropriate mitigating measures in relation to the applicant's rehousing requests.
 - ii) Once these risks have been assessed and information from specialist agencies have been received, PFH may decide that
 - o either the risk is too great and therefore the applicant is ineligible for accommodation (such as evidence of past unacceptable behaviour that would warrant an outright possession order through the courts, or the breaching of a CBO or an IPNA), or any other offence which deem the applicant to pose an on-going risk to residents or their visitors.
 - o the risk is such that the applicant will be considered for housing – if there is clear evidence showing that the applicant has shown a change in behaviour this could include such things as working to the terms of any CBO or IPNA or agreeing and working to any terms agreed under Community Resolution for a period of up to 2 years. The risk will then be reviewed by the Home Services Director after 2 years have elapsed and reported back to the Board. The Board will then decide whether the applicant can be accepted onto the waiting list and rehoused. If the Board decide that the risk is still too great, then the applicant will be ineligible for accommodation. An application may however be re-submitted where the applicant can evidence a change in behaviour that has been sustained for a period longer than 6 months.
- 12.8 Information and any risk assessment undertaken relating to the above-mentioned applicants will be provided to the Board with recommendations for decision. No allocation will be made prior to the above decision-making process and any allocation will be halted if further information comes to light and will be subject to further formal review by the board. Should

the application be considered for an offer of housing ahead of a board meeting, a brief report outlining the nature of offences, an assessment of risk and recommendations will be submitted to the Chair or Deputy Chair of the Board who will make a decision on whether to approve the application or not.

12.9 Applications from current or former staff, residents, board members or contractors will be considered as a 'sensitive' application and will be subject to board approval. The 'Applicant Declaration' shall be completed in all cases, and all such applications will require Board approval. (See also section 13).

12.10 Domestic Abuse and Safeguarding

12.11.1 PFH's Domestic Abuse policy states that PFH will where possible assist those suffering domestic abuse if there is a risk of immediate harm. Additional points will be awarded to the applicant. Offers of accommodation remain subject to the usual eligibility checks and the availability of suitable housing.

13 Non-Dependents

13.1 A Non-Dependent (ND) is someone who lives with a Licensee, but who is not named on the licence. Not being named on the licence is usually because the person does not meet the basic qualifications to be a PFH beneficiary and therefore is essentially occupying the property as a guest of the Licensee.

13.2 The Licence (Letter of Appointment) contains a section on ND's and the ND is obliged to sign a separate letter confirming their understanding of their occupancy status, and that they are not a Licensee.

13.3 In all cases, ND's are required to provide a satisfactory landlord reference, and/or an Applicant Declaration before being considered and approved by the Area Coordinator.

13.4 Non-Dependents in PFH Plus Schemes

13.5 In PFH Plus schemes, PFH reserve the right to exercise further discretion and put in place controls when considering ND requests so that all relevant background information and the appropriateness of the request are considered. We will ensure:

- That other residents are not adversely affected by, for example, younger people living in the building,
- That the dynamic of the scheme and services are not compromised,
- That PFH Plus remains 'exempt accommodation', and
- A satisfactory landlord reference and Applicant Declaration form are received.

13.6 Requests from those under 50 and who wish to move in with a licensee at a PFH Plus scheme will be considered on a case-by-case basis, by the Scheme Manager and Area Coordinator, who will provide a report to the Resident Services Manager. The report will include their rationale of the suitability of the ND in PFH Plus, the ND's past record, the balance and make-up of the scheme and whether there are other management concerns within the scheme. The Resident Services Manager will have the authority to refuse or approve the request based on the information provided.

13.7 Requests from those aged between 50 and 60 wishing to move into PFH Plus schemes may be considered and approved by the Area Coordinator following a process of assessment, however if there are any concerns about the ND's suitability, as per 14.9, these will be raised

with the Resident Services Manager as per the above steps, before the AC and RSM make a joint decision as to whether to approve the request.

- 13.8 The residents must be made aware that the person under 60 (or under 50 for some schemes), may not be able to remain in the property should the qualifying resident leave for any reason. They will be asked to sign a 'non-dependent' licence letter which makes this clear. However, consideration will be given as to whether the non-eligible resident may remain in the property, for example, if the resident is 59 and has otherwise had a good licence record. The AC will provide the RSM with a written report outlining their recommendations, for decision.

14 Commitment to Refer

- 14.1 As part of the National Housing Federation's 'Commitment to Refer', PFH will refer an individual or household to a local authority if they are homeless or threatened with homelessness. In addition, PFH will award appropriate points if an applicant is homeless and the local authority is able to verify this.

15 Offers of accommodation

- 15.1 PFH makes every effort to ensure that only areas and property types chosen by the applicant, and for which they have a reasonable chance of being rehoused at, are added to their application choices. This helps to ensure applicants have realistic expectations of their chances of rehousing. It also reduces the number of refusals or inappropriate offers and allocations.

- 15.2 The applicant will in all cases be offered a viewing before making a decision about accepting the property.

15.3 Reasonable and Unreasonable Refusals

- 15.4 In the event that an applicant refuses an offer, further offers may be made. Applicants may be given up to three offers of accommodation. If these offers subsequently turned down and the reasons deemed to be 'unreasonable', PFH reserve the right to remove them from the waiting list or bypass their application should they show on shortlists for future vacancies. However if there are operational difficulties with letting the property in question, or other extenuating circumstances, the application may remain on the list at PFH's discretion. .

- 15.5 If one or more of the offers were deemed to be reasonable, i.e. refused due to affordability, there is a safety concern, or the property does not meet the current or long-term needs of the applicant, further offers may be made but only if 'unreasonable' refusals do not exceed three (notwithstanding 16.4 above).

- 15.6 Those who wish to transfer to another PFH property will be given no more than three occupancies with PFH unless there are exceptional circumstances, for example where there is a significant risk to the resident's physical or mental health, and where this is supported by a health professional.

16 Deferrals, Suspensions, Cancellations and Pending Applications

- 16.1 PFH may defer, suspend or cancel an application in some circumstances.

- 16.2 Suspensions may occur, for example, when there is sufficient doubt as to the applicant's suitability as a resident, and/or while the provision of further information is pending.

- 16.3 A cancellation of an application may occur, for example, when we have been made aware that the actions or behaviour of an applicant is inappropriate, vexatious, threatening or violent and/or may pose a high risk to staff or residents. A cancellation may also occur if the applicant has requested that their application be cancelled, or if they have not responded to communications, or if PFH becomes aware that the applicant is no longer eligible to be a beneficiary of the charity.
- 16.4 An application may be deferred, for example, if the applicant has requested that they remain on the waiting list but are not in a position to move yet. The date of lifting the deferment will be agreed with the applicant. A deferment will mean that the applicant will not show on shortlists when allocating properties.
- 16.5 An application may be marked as pending if there is information outstanding in order to assess the application. This may be, for example, supporting letters, information which proves their eligibility to be a beneficiary, or to prove their 'Right to Rent'. Whilst pending applications may show on shortlists, these applicants will be overlooked if information is outstanding.

17 Applications from Staff, Board Members, their Relatives, or Contractors

- 17.1 Applications can be received from people directly or indirectly connected with PFH provided any conflicts of interests are declared, mitigated, and managed.
- 17.2 Applications from current or former staff, their relatives, board members, their relatives or contractors will be considered based on eligibility for rehousing, however PFH will ask all such applicants to complete the Applicant Declaration. PFH will consider criminal convictions, injunctions, arrears, ASB and current or past conduct.
- 17.3 Information on such applications will be provided to the Director of Home Services for approval. In the event that the applicant is connected to the DoHS, or the DoHS is absent, approval will be sought from the Chief Executive. PFH must ensure that the staff member is not directly or indirectly involved in the application process nor the allocation of accommodation to themselves, their relatives or their friends.

18 Review of Applications

- 18.1 All applications on the waiting list are reviewed on a rolling three-yearly basis. Applicants may be contacted in writing, by phone or via text message. The purpose of the review is to ensure that the information that we hold for each applicant is accurate and up to date and that we confirm the applicant still wishes to remain on the list.
- 18.2 A review of an application may take place if an individual's circumstances have changed. The applicant may update their own application within the customer portal, or PFH may update the application. Any changes in points will be notified to the applicant, either as a pop-up message when the update has been made on the customer portal, or as a text message or email. It is the responsibility of the applicant to maintain their application if circumstances change or contact PFH who can do this for them. We will also review the waiting list every three years.

19 Allocation Control Measures

- 19.1 Checks to ensure an applicant meets all eligibility criteria before being offered accommodation, and that appropriate proofs are in place, will be undertaken by the RSM before approving each allocation. If an error or omission is identified, the allocation will not

be approved or may be approved subject to receipt of the document. Repeated errors or omissions will be managed with the member of staff involved and will include discussions noted formally through check-in meetings. Repeated failures in allocation submissions may be managed through appropriate employment policy.

20 Appeals

- 20.1 Anyone enquiring or applying to PFH for rehousing can appeal against a decision that has been made. The appeal should firstly be made to the Resident Services Manager. A full response to the appeal will be made within 10 working days.
- 20.2 If any applicant believes that PFH has not complied with the terms of the Allocations Policy, or they are dissatisfied with the way their application has been handled then they are encouraged to make a complaint through PFH's complaints policy, setting out their reasons for dissatisfaction and the resolution they seek.

21 Confidentiality and General Data Protection Regulation (GDPR)

- 21.1 By providing information and signing the application declaration, applicants provide PFH with their explicit consent to PFH using any personal information (including health information and information relating to criminal convictions) for the purposes of processing the applications and assessing suitability and eligibility for a property having regard to our relevant criteria. Where we process information relating to ethnicity, sexuality, and date of birth, PFH do so on the basis that the processing is necessary for the substantial public interest in ensuring meaningful equal opportunity monitoring, reporting and complaints.
- 21.2 We will only collect information about criminal convictions where it is appropriate and where we are legally able to do so. Any such checks will be carried out in order to satisfy ourselves that there is nothing in the applicant's criminal convictions history which makes them unsuitable for rehousing with PFH, having regard to our duty of care to our staff and other residents, in which case we may ask to see a basic disclosure of criminal records history.
- 21.3 If an applicant fails to provide certain information when requested which is necessary for PFH to consider their application, PFH may not be able to consider the application further. Information is also recorded on computer systems and is done so in accordance with GDPR.

22 Our Commitment to Equalities

- 22.1 Everyone at PFH has a responsibility to ensure that this policy is put into practice. We expect a commitment from everyone to ensure that their action does not lead to unlawful discrimination.
- 22.2 Deliberate acts of discrimination, including victimisation, harassment, instruction or pressure to discriminate, will result in serious disciplinary action taking place possibly including dismissal of employees and termination of contracts with external agents.
- 22.3 PFH can provide access to interpreters for minority languages, sign language and can organise written material in large print and Braille where required, including all documents relating to ASB. Our offices, Retirement Plus Schemes and Pop-In Centre's are wheelchair accessible. An induction loop can be provided when residents attend our offices.
- 22.4 The Association will aim to ensure that no individual or group is treated less favourably on the grounds of age, disability, gender, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation. We aim to

recognise the needs of individuals and treat each person through the allocations process with dignity and respect.

- 22.5 PFH will take account of the individual needs of residents who may require additional support and services in its allocations processes so as to provide a service to suit the individual where necessary.

23 Associated Policies

Complaints Compliments and Suggestions policy
Charity Commission Governing Instrument
Domestic Abuse policy
Safeguarding policy
Equality, Diversity Inclusion policy
Data Protection Act 2018
Income Management policy
Void Management policy
Fire Safety Policy

24 Appendices

- 1 Application points assessment form
- 2 Landlord reference request form
- 3 Applicant Declaration
- 4 Outstanding Proofs letter
- 5 Initial Enquiries Leaflet
- 6 Waiting List Closure Controls