

Lettings Policy

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1. Our purpose

We're proud to be able to support tens of thousands of people across England by providing affordable housing and care to help people live independently.

Everything starts at home, and we are privileged to be able to do work which makes a real difference to the lives of people in our communities. Everything we do is about people – whether that's providing a good quality, safe home or providing care which helps someone to live an independent life.

We live and breathe this social purpose.

2. Introduction

This policy describes how GreenSquareAccord (GSA) lets our general needs (social and affordable) rented homes. It provides information and advice for customers and colleagues on how we consider applications and allocate our homes.

When we allocate our homes, we will have regard to all relevant legislation and regulation, including the regulatory requirements of the Regulator of Social Housing (RSH) which are set out in the Consumer Standards. This policy sets out how we will comply with the requirements of the Tenancy Standard (one of the consumer standards) which are to:

- ◆ let our homes in a fair, transparent and efficient way
- ◆ consider the housing needs and aspirations of customers and potential customers
- ◆ demonstrate how our lettings make the best use of available housing and are compatible with the purpose of contributing to the local authority's strategic housing function and achieving sustainable communities.

Our customers will also have opportunities to exchange their tenancy by way of online mutual exchange services.

The aims and objectives of this policy relating to our customers, future customers and our communities are:

- ◆ We will let our homes in a fair and transparent way which most effectively meets housing need and creates sustainable tenancies and communities whilst minimising the time that properties remain empty between each letting.
- ◆ We will let our homes in an efficient and timely manner.
- ◆ We aim to ensure all customers are treated in a fair and equitable manner.
- ◆ We will work with customers to offer choice where possible and to minimise potential financial hardship.
- ◆ We will work with customers who have limited housing options due to relationship breakdown, domestic abuse, homeless or other reasons.
- ◆ We will work to support all customers according to their needs, making specific provision for customers with vulnerabilities.
- ◆ We will make available options for transfer and exchange.
- ◆ We will work with local authorities and other stakeholders to develop Local Lettings Plans to improve access to housing and create sustainable communities.

The aims and objectives of this policy relating to our stakeholders are:

- ◆ We will meet the requirements set out by our regulator.
- ◆ We will support local authorities and other partners to help meet local housing need.
- ◆ We will participate in choice-based lettings schemes and other nomination arrangements with our local authority partners.

3. Scope of Policy and Exclusions

This policy sets out how we allocate and let our Social and Affordable rented properties. It applies to customers of GSA in the following categories: general needs, sheltered and age restricted general needs housing.

It does not apply to any fully mutual housing co-operatives, housing for sale or shared ownership.

Housing let via our Care and Support services will follow the same aims and objectives as this policy, but the letting of these homes (including applicants' eligibility and reasons not to offer a home) will be via separate arrangements specific to the individual schemes.

For details of the types of tenure and tenancies available, please refer to the Tenancy Policy.

4. Definitions

Letting	Refers to the process whereby we rent a property both for new homes and subsequent relets.
Choice Based Lettings	A system operated by some local authorities enabling customers to bid for properties advertised.

Nomination Agreement	Refers to an arrangement whereby a certain proportion of homes provided by us are allocated to customers from the housing waiting list of a local authority.
Nomination	A household selected by a local authority as having a housing need for a GSA home.
General Needs	Refers to our rented homes provided for customers to live independently and where we do not provide direct support or care services.
Sheltered Housing	This usually consists of purpose-built flats with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services but provides some housing related support to enable residents to live independently.
Age designated Housing	This type of housing is for people aged 55 and over. It may include some shared amenities such as communal gardens but does not include support or care services.
Local Lettings Plans	Time limited allocation schemes that apply to more than a single dwelling and fall outside of the standard nomination agreement or lettings policy to

5. Roles and Responsibilities

The **Executive Board** are responsible for:

- ◆ Seeking assurance that legislation and regulations relating to our policies are complied with, via annual review by the Head of Legal.
- ◆ Providing the necessary resources to deliver the policy and associated processes effectively.

The **Director of Homes and Communities** is responsible for:

- ◆ The regular review, implementation and monitoring of this policy and for reporting to boards and committees as required.
- ◆ Negotiating strategic partnerships with local authorities and other partners
- ◆ Oversight on internal and external audit reports and for providing board assurance in relation to regulatory compliance
- ◆ Approving reports for employees and or board member rehousing

Heads of Service are responsible for:

- ◆ Liaison with local authorities and other Registered Providers in relation to choice-based letting schemes, nomination agreements and allocations and lettings strategies
- ◆ Approval of Local Lettings Plans
- ◆ Overseeing any appeals
- ◆ Participating in external benchmarking
- ◆ Providing local reporting e.g. to co-op partnership boards
- ◆ Ensuring that team responsibilities are reflected in meetings and performance reviews, and appropriately covered within departmental business plans, standard operating procedures, contingency plans and strategies

Departmental Managers are responsible for:

- ◆ Approving single needs assessments
- ◆ Investigating appeals
- ◆ Agreeing discretion in relation to reasons for accepting, refusing or suspending applicants
- ◆ Approving offers and management transfers
- ◆ Preparing reports for colleagues and or board member rehousing
- ◆ Ensuring colleagues are well-trained and supported to deliver
- ◆ Preparing information for reporting and monitoring purposes
- ◆ Monitoring that standards are complied with
- ◆ Taking action where data standards fall below those expected

Operational colleagues are responsible for:

- ◆ Liaising with local authorities and partners regarding nominations and choice-based letting applications
- ◆ Preparing adverts and updating choice-based letting schemes and other websites
- ◆ Processing applications and managing any direct waiting lists
- ◆ Contacting applicants to arrange assessments and property viewings
- ◆ Undertaking tenancy checks and Housing and Support Needs Assessments with applicants
- ◆ Reporting concerns of tenancy fraud
- ◆ Supporting applicants and / or signposting in relation to tenancy sustainment

Working groups will be set up as and when required to consider improvements and changes to this policy and other associated policies and procedures

Every colleague is responsible for:

- ◆ Delivering a customer-led service and for suggesting ways to improve and enhance the customer experience
- ◆ Preventing and / or responding effectively to complaints and concerns
- ◆ Recording information in a timely and accurate way having regard to UK GDPR, Data Protection rules and the Data Protection policy
- ◆ Ensuring that they comply with the requirements of this and other policies and procedures relating to their role

6. Policy

6.1. Policy Statement

One of our principal purposes is to provide housing for people in housing need and to create communities where people want to live. An effective and fair Lettings Policy is essential to the creation of a stable and sustainable community. We are committed to this ideal. By allocating housing that is appropriate and fit for the needs of our customers, they will be encouraged to stay in their properties, which will enable sustainable communities to develop.

Through development and the management of our existing stock we create quality new homes and sustainable communities where people can enjoy happiness, health and prosperity – the vital foundations for successful and fulfilling lives.

We are committed to making the best use of our stock whilst, where possible, offering customers choice over the homes most suitable to them. We are also committed to supporting customers to sustain tenancies and to provide housing options for those whose circumstances have changed.

6.2. Policy Outline

This policy sets out how we let our homes. It also sets out circumstances where we will consider not offering a property to a customer. Due to the varied nature and availability of social housing and the different approaches of local authority partners, it is important that we can adopt different procedures when allocating our own stock. This policy supports such an approach and identifies the various ways in which homes are allocated.

6.3. Policy Requirements

It is important that we publish clear and accessible policies, which outline our approach to lettings and let people know what they can expect as a customer or an applicant. This policy has been prepared and will continue to be monitored in line with the allocations and lettings strategies published by relevant local authorities.

6.3.1. Letting our Empty Homes

We will let our general needs homes via one of the following ways:

- ◆ Choice-based letting scheme
- ◆ Nomination
- ◆ Direct Waiting List
- ◆ Direct let
- ◆ Management transfer
- ◆ Referrals by our Care & Support directorate
- ◆ Referral by a partner agency, normally as part of a reciprocal agreement

In some areas, stock may be allocated in only one or two of these ways. For example, in areas where we have limited numbers of properties, lettings will be made exclusively via the nominations agreement or choice-based letting schemes.

- ◆ We will generally let our properties through local authority choice-based letting schemes or via local authority nomination agreements.
- ◆ We make best use of our stock in some local authority areas by re-letting via a 'management transfer' or a 'direct let' outside of local authority allocations schemes.
- ◆ We may also let homes outside of a local authority's policy where there is a need for a Local Lettings Plan or sensitive let. These will be agreed in advance with the appropriate local authority to create sustainable communities.
- ◆ For our current customers, we will promote, and offer advice to assist with mutual exchanges.
- ◆ We will make the best use of our stock and offer empty homes of a suitable size to meet an applicant's housing need. We will consider allowing a home to be under-occupied

depending on the applicant's circumstances. The applicant will need to be able to afford any shortfall in housing costs.

6.3.2. Applicant Eligibility

Any person can apply for a GSA general needs property via the routes mentioned although there are circumstances where we may refuse to consider an applicant.

- ◆ We will undertake an assessment of an applicant's status including their ability to afford the property and this will take account of all household finances, not just the housing costs in isolation.
- ◆ The assessment may include the requirement for the applicant to check (either on-line or otherwise) if they are eligible for any state benefits.
- ◆ If the assessment shows that the applicant is not in a position to afford and sustain the tenancy, they will not be offered the property in question and where appropriate, they will be advised about more affordable options suitable to their needs.
- ◆ Alternatively, if an applicant has sufficient equity and/or income to purchase their own home or secure private accommodation, they will not be eligible for one of our affordable or social rent properties. We will apply the limits set by the relevant local authority when assessing those applicants.
- ◆ Applicants must usually have a clear rent account and/or have no housing related debt. This could include rent or mortgage arrears, both current and former, even if the arrears are due to a shortfall in benefits due to under-occupation or non-dependent charges. More detail on the affordability criteria we apply is set out under section 6.3.11 (ii) below.
- ◆ If an applicant has housing related debt, then an application to our own or a local authority hardship fund may be made. In these cases, the applicant will not be considered for an empty home until the debt has been cleared or the application to a hardship fund has been approved.
- ◆ Where an applicant has housing related debt, we normally expect a payment agreement to have been maintained for 13 consecutive weeks where the initial arrears were £999 or below or 26 consecutive weeks where the initial arrears were £1,000 or more.
- ◆ We will normally only let our empty homes to those applicants 18 years or over. Applicants over 16 and under 18 years old will only be considered in exceptional circumstances where these cases will normally be supported by the local authority and a guarantor will be required.

6.3.3. Housing of colleagues, board members and their relatives

Applications for housing which are made by employees of GSA or their close relatives, contractors, or board members or their close relatives are permissible so long as the decision is made fairly and in strict accordance with this policy and as set out within the Housing Act 1996 Schedule 1 Section 2. Approval has to be provided as set out below:

- ◆ For colleagues – applications require approval by either the Head of Housing Operations, the Head of Localities or the Senior Lettings Manager, followed by Governance approval from the Company Secretary (Executive Director of Governance).
- ◆ For board or committee members and members of the Executive Team – applications

require approval by the People and Culture Committee.

6.3.4. Applicants Ineligible for Social Housing

We will not house an applicant who is legally not eligible for social housing, such as those subject to immigration control and who do not have a 'Right to Rent'.

We reserve the right to let to applicants who ordinarily would not be eligible for social housing but who fulfil the aims of our charitable status. This could be in the following circumstances:

- ◆ It relates to a hard to let properties that we have been unable to let via the local authorities choice-based letting schemes.
- ◆ It is a requirement of the S106 or an agreed local lettings plan.

For any applicant we let our homes to, we will apply our usual pre-tenancy checks and our Tenancy Policy will still be applicable.

6.3.5. Immigration Status

We will house applicants who have permanent or limited leave to remain in the UK. The following documents must be seen prior to offering a tenancy:

- ◆ A copy of the passport.
- ◆ A copy of the documents included in an application to renew leave to remain; and
- ◆ Immigration Status document provided with asylum decision; or
- ◆ Letter from the Home Office or UKBA confirming eligibility.

If an applicant has limited leave to remain, any offer of accommodation will be regarded by us as non-secure and cannot be used as permanent accommodation or permanent status for benefit entitlement, for example. In these situations, a temporary, non-secure Tenancy will be granted (please see our Tenancy Policy).

We will comply with Right to Rent legislation when considering direct applications, to ensure we meet legal requirements under the Immigration Act 2014 (as amended by the Immigration Act 2016).

6.3.6. Nomination Agreements and Choice-Based Letting

The majority of our homes are let through local authorities' choice-based letting schemes. We are committed to the principles of choice-based lettings as a fair and transparent way of sourcing applicants for our empty homes. We will work with local authorities in order to assist with their statutory duties in relation to the homeless and those in priority need; however, any nomination must meet the criteria of this Policy. Each local authority has its own system for advertising and short-listing applicants.

We will work with local authority partners and statutory agencies to reach agreement on the proportion of empty homes to be offered to local authority nominations. This will generally be 100% first lets for newly built homes and for re-lets this will vary in accordance with the nomination

agreement for each local authority.

We will adhere to the provisions of any nomination or service level agreement we hold with our local authority partners. However, we reserve the right to refuse nominations in accordance with this Policy.

A local authority may nominate an applicant outside of their choice-based letting system in exceptional circumstances. This is usually when the property is or can be adapted for the applicants specific housing needs.

6.3.7. Direct Waiting List

In certain local authority areas where 100% nomination rights do not apply and there is not an adequate letting arrangement or CBL system in place, we may operate its own Direct Waiting List.

Applicants who wish to join a Direct Waiting List will be subject to the same eligibility and assessment requirements as listed in this Policy. When allocating properties to applicants from the Direct Waiting List, our aim is to house people in housing need whilst ensuring tenancies will be sustainable in the long term and contribute to settled communities.

Applicants on a Direct Waiting List will only receive 1 offer of accommodation. If this offer is not accepted, the applicant will be removed from the waiting list. To ensure our Direct Waiting List are manageable and maintained at an appropriate number of applicants, they can be closed to new applicants at any time without prior notice.

6.3.8. Mutual Exchanges

We provide a free subscription for all GSA customers to an online national home swap service provider.

6.3.9. Management Transfer

There may be exceptional circumstances where there is an overriding urgent housing need for an existing GSA general needs or care and support customer to permanently transfer to another home where there is evidenced threats to life or serious risk of harm (e.g. due to violence, domestic abuse, sexual abuse, harassment, hate crime or fire safety issues). Management transfers will be outside our usual lettings process and may also need agreement with the relevant local authority.

Within our care and supported housing services, in addition to the above circumstances, a management transfer may also be considered where a move to another property will meet the specific needs of the individual tenant. For example an already adapted property.

Dealing with cases of over-crowding and under-occupation helps us to make best use of our stock. Where a customer is under-occupying their home and wishes to move, we will work closely with our local authority partners to encourage a move into more suitable, smaller, accommodation. We will give advice on housing options for their area, this includes applying to the relevant Local Authority and/or seeking a Mutual Exchange. In very exceptional

circumstances we may consider a management transfer for customers due to unsuitable occupancy levels within their home.

Each case will be considered individually on its own merits and will require the approval of departmental managers (within Localities and Lettings for our general needs customers or Care and Support for our C&S customers). For individual cases where there are very exceptional circumstances, we may decide to rehouse a customer who does not meet the eligibility criteria (as laid out in the Lettings procedure) following approval from a Head of Service within Localities or Housing Operations.

If a customer is approved for a management transfer, they will receive one reasonable offer of a similar size to their current home and the Management Transfer status will remain valid for a period of up to 3 months from date of approval. An additional offer may be made in exceptional circumstances if authorised by the relevant departmental manager.

6.3.10. Local Lettings Plans

We will introduce Local Lettings Plans to address housing management issues, make the best use of our homes and to help create balanced and sustainable communities in a specific area. We may have tailored eligibility criteria for these lettings which consider the needs of a defined area in terms of building a balanced and sustainable community, rather than concentrating on meeting housing needs alone. This may mean that our priorities for rehousing may differ from this policy and we reserve the right to do this in these circumstances.

We will consult our local authority partners when adopting a Local Lettings Plan. To ensure the plan reasonably balances the demands of housing need and the specific issues identified, a Local Lettings Plan will have the approval of the Head of Housing Operations and the relevant local authority. Local Lettings Plans will only be in place for a set period of time and will be regularly reviewed to ensure they continue to meet the initial aims.

The Local Lettings Plan will include the following information:

- ◆ Why the plan is needed
- ◆ The aim of the plan
- ◆ Who has been consulted about the plan
- ◆ Details of the scheme and locality affected by the plan
- ◆ Transport links, shops & facilities, health services and alternative housing options
- ◆ The profile of the locality
- ◆ The duration and review periods of the plan
- ◆ Any specific lettings criteria to be applied

Local Lettings Plans will be reviewed periodically by the Head of Housing Operations. A copy of any Local Lettings Plan will be available for colleagues, relevant local authorities, prospective and current customers on request.

6.3.11. Deciding not to offer a home

We will consider every applicant's individual circumstances before making any decision, however

if we decide not to offer a home, we will explain our reasons clearly, as well as what the applicant needs to do in order to be re-considered in the future and our appeals process. We will confirm our decision in writing if needed.

The lists below are not exhaustive but provide some examples of what we consider when making our decision to offer a home;

i. Anti-Social or Unacceptable Behaviour

We will not usually offer a home to applicants (including members of their household) who have a history of anti-social or unacceptable behaviour. All relevant circumstances will be considered and we will examine the strength of the evidence against the applicant and the members of their household when making our decision. We are unlikely to offer an applicant a home due to their behaviour if (but not limited to):

- ◆ Individuals or members of their household who have been served with a Notice of Seeking Possession by their current or previous landlord for anti-social behaviour related issues in the 3 years prior to the application or following our housing assessment.
- ◆ We receive a reference highlighting the applicants or any members of their household's inability to manage a tenancy (e.g. intentional damage to the property).
- ◆ Individuals or members of their household who have a current Community Protection Notice (CPN) or Criminal Behaviour Order (CBO) or an Injunction or have been the subject of one in the 3 years prior to the application date or following our housing assessment.
- ◆ The behaviour breached tenancy conditions and caused the applicant or any members of their household to be evicted.
- ◆ The applicant or any members of their household have been verbally or physically abusive towards a GreenSquareAccord colleague or contractor.
- ◆ Our assessments indicate that the applicant or any members of their household are likely to pose a risk to their household, neighbours and / or wider community. This will normally be confirmed by an external partner such as the Police, Probation Services, Social Services or Educational Welfare.
- ◆ The applicant or any members of their household have obtained or attempted to obtain a tenancy by deception, for example, by withholding information or by giving false or misleading information.

ii. Affordability

Both new and existing customers will be required to demonstrate that the tenancy will be sustainable and that they can afford to pay the rent and service charges and have enough money left to live on. We have a framework with income thresholds to use when deciding if a customer has enough income to live on after paying their rent and service charges.

This will be based on the amounts that we deem each household to need as a minimum net amount. We will not normally offer a tenancy to an applicant if they (but not limited to):

- ◆ have any amount of former or current arrears with GSA
- ◆ owe over £1000 of rent, mortgage or other housing debt to other landlords

- ◆ have history of making sporadic or late payments to their landlord
- ◆ have failed to make or maintain an agreed payment plan
- ◆ have recently cleared rent arrears or housing debt to be considered for another home
- ◆ have been evicted for rent arrears on a previous tenancy in the last 3 years.

Applicants with housing related debt and / or arrears to other landlords may still be considered for housing if:

- ◆ they can provide evidence they are maintaining an agreed repayment plan for each debt and have been doing so for a minimum of 6 (six) consecutive months immediately prior to their application
- ◆ and/or have made a reasonable attempt to repay the majority of the debt.

We may consider exceptions to all or some of the conditions mentioned in this section if there is evidence of the following circumstances:

- ◆ Housing related debt and / or arrears were accrued because of a lack of tenancy support.
- ◆ Applicants are identified at risk of suffering financial hardship if they remain in their current home and the applicant can demonstrate the affordability of all their existing financial commitments in addition to all costs relating to the property they have applied for and they have made a payment arrangement to clear any debts with their former landlord, even if this arrangement is less than 6 months old.
- ◆ There is an overriding need, such as a high medical need, which has resulted in a home becoming unsafe for the applicant or impossible for them to enter or exit safely.
- ◆ The applicant has accrued the debt as a result of fleeing domestic abuse and this is supported by a relevant supporting agency, statutory or otherwise.
- ◆ They are a GSA customer and need to downsize from their current home and the move will reduce their housing costs.

In such cases, the individual circumstances of the applicant will be considered and if needed a final decision will be made by a manager in the Lettings team.

iii. Homeowners

It is highly unlikely that we would house an applicant who owns or has a legal interest in a property. Homeowners seeking housing will be subject to any assessments that are needed to comply with the relevant local authority's allocation schemes in order to make sure that their need cannot be met via the open market. We may consider existing homeowners in the circumstances listed below. All cases will be assessed on an individual basis.

- ◆ The property has been or is about to be repossessed and there are insufficient funds to rent on the open market.
- ◆ The homeowner has fled a property due to domestic abuse and is found by the local authority to be eligible for housing. In cases such as these we may consider granting an Assured Shorthold Tenancy.
- ◆ The property is for sale on the open market and has become unsuitable due to disability, the homeowner is unable to fund the required adaptations and is unable to secure a

Disabled Facilities Grant from the local authority to carry out the necessary works and is unable to secure accommodation in the private sector.

- ◆ The customer has left the property because of a relationship breakdown and they can demonstrate they have insufficient funds to rent or buy on the open market.
- ◆ The property in question is a mobile home / caravan.

iv. High income/savings/assets

We will not normally offer a home where there is evidence that an applicant has sufficient financial means to meet their housing need. We will apply the limits set by the relevant local authority when assessing those customers that apply directly to us.

v. Availability of appropriate support

We will only offer a home to vulnerable applicants who need support to manage and sustain a tenancy where adequate support arrangements are in place. We will work with agencies to confirm that support is in place before making a final decision. We will not offer a home where the applicant refuses to or has demonstrated that they are unlikely to engage with any support that is put in place.

vi. Minors (under 18 year olds)

Anyone under 18 cannot legally hold a tenancy. We will consider offering a home to under 18s if the tenancy is held in trust by a family member or recognised agency, and relevant support is in place. Please see our Tenancy Policy for further information.

vii. Re-housing violent and sexual offenders

We will work with relevant agencies to make a full assessment and carefully consider any risks before making a decision to offer a home to a violent and sexual offenders.

6.3.12. Suspension from the Direct Waiting List

Applicants can be suspended or removed from the Direct Waiting List managed by GSA for the following reasons:-

- ◆ Providing false information – it is a criminal offence for a person to withhold information or provide false information in relation to any application to be housed.
- ◆ If the applicant's circumstances have changed since applying and they are no longer in housing need.
- ◆ If the applicant refuses a reasonable suitable offer of housing.

The disqualification period will be for no more than two years. Where the application is suspended, it will be reviewed periodically but the onus is on the individual to reapply.

If an applicant is suspended from the Direct Waiting List, the applicant can continue to apply for housing with GSA via the relevant local authority.

6.3.13. Appeals Process

An applicant can appeal against our decision not to offer them a home if they believe we have not considered all relevant information or have made the decision unfairly.

Appeals must be made within 5 working days (from the date the applicant is informed of the decision not to offer) and should normally be made in writing. We will not hold any homes empty whilst the appeal is being considered. However, if the appeal is successful, we will seek to offer a suitable alternative property via a direct let, subject to availability.

An independent manager who was not involved in the original decision will review the appeal. Applicants will be notified of the outcome in writing within 10 working days of the date of the appeal or within a mutually agreed timescale. This decision will be final.

7. Monitoring and Reporting

7.1. Data Recording

The fundamental principle of data quality and recording is that data should be right first time, which means that the responsibility is held at the point at which it is collected and recorded, whether the person recording the information is clinical, technical or clerical.

All colleagues are responsible and accountable for the quality of data they collate and record.

Colleagues must ensure that they complete the appropriate continuous recording of lettings and sales in social housing in England (referred to as CORE) reporting returns. This collection provides all of the statistical information that the Department for Levelling Up, Housing, Communities produces on social housing lettings and includes:

- ◆ trends in social housing lettings over time
- ◆ characteristics of tenants with new social housing lettings
- ◆ types of tenancy agreements

Annually the NROSH+ return will be completed and submitted. NROSH+ is the data collection website of the Regulator for Social Housing (RSH) in England, through which it collects regulatory data and information from registered providers of social housing.

7.2. KPIs

In addition to standard KPI's for re-let times and voids we monitor customer satisfaction with new lettings, in regard to both the home, and the process.

7.3. Monitoring Effectiveness

Regular reviews will be undertaken to assess the use and implementation of this policy and that it is meeting business plan and organisational objectives.

We will regularly monitor the effectiveness of nominations and choice-based letting arrangements.

7.4. Reporting Fora and Frequency

Internally

- ◆ Monthly performance reports at individual and team level
- ◆ Quarterly Executive team reports at Directorate level
- ◆ Quarterly Committee reports at Directorate level
- ◆ Board reports at Directorate level (as and when required)
- ◆ Reports for Customer Panels (as and when required)

Externally

- ◆ Local authority nomination and lettings returns as required
- ◆ CORE forms quarterly
- ◆ NROSH+ annually

8. Assurance

Internal Audit: Adherence to this policy will be routinely assessed on a risk-based basis by our internal auditors. In addition, line managers should ensure that regular spot checks are carried out to identify and remedy any issues.

External Audit / Validation: Adherence to this policy may be audited / validated by the following external bodies:

- ◆ Homes England via scheme development reviews

Service Standards: Customers will be involved in developing service standards and in monitoring and scrutinising performance.

9. Equality Impact Assessment

9.1. Customers & Communities

Tenancy sustainment lies at the heart of our approach to lettings, ensuring we take account of individual and local circumstances when allocating and letting properties.

We will actively lead and participate in Local Lettings Plans where these are appropriate and approved.

We are committed to working with local community organisations and representatives to ensure that housing is allocated, and support services are managed, in ways that meet the needs of the community and help sustain tenancies. Emphasis will be placed on working with applicants prior to becoming our customers in terms of tenancy sustainability, to ensure the right people are housed in the right properties.

We aim to increase our customer satisfaction levels by having an accessible and efficient lettings process and offering good quality homes.

We will ensure that no person or group of persons will be treated less favourably than another person or group of persons on account of any diversity strand or protected characteristics.

We will ensure our customers have fair access to our homes and will provide translation services when required.

9.2. Governance

Approval of the Homes and Customer Experience Committee is required for this Policy. We will review this policy in line with any changes to the Tenancy Standard as published by the RSH and in line with prevailing good practice. We will ensure that in handling the personal data of our customers, we will abide by the UK GDPR and Data Protection rules.

9.3. Partners

We will work in partnership to maximise the opportunities for our customers to access good quality homes. Where appropriate to do so, we will participate in choice-based letting nomination arrangements with local authorities in the areas where we operate. We will make available opportunities for management transfers and also for exchanges through our membership of HomeSwapper UK (or alternatives) and in partnership with other registered providers.

We will be actively involved in any review of local authority nominations agreements and we may make use of external agencies to provide information, advice and guidance to our customers. We will assist local authorities and other partners to prevent and reduce homelessness.

We are committed to working to prevent discrimination and to proactively assist all those who may find it difficult to obtain good quality housing. In particular, we will work with representative organisations to assist them to meet the housing needs of the groups they represent.

9.4. People

We will make sure colleagues are appropriately trained and understand how to implement this policy.

10. Training and Competency

All colleagues will receive adequate training in the use of policies, documentation, systems and records required as part of their role. Induction, supervision and appraisal processes will be used to monitor colleague's understanding and compliance with expectations.

Where anomalies indicate changes are needed to training programmes, changes will be made to reduce the risk of recurrence and ensure expected standards are clear.

11. Communication and Implementation

Line managers will ensure that this policy and any team responsibilities are communicated as appropriate and reflected in meetings and performance reviews, and appropriately covered within departmental business plans, standard operating procedures, contingency plans and strategies. Colleagues may be asked to confirm they have received and understood the details of this policy.

12. Legal and Regulatory Framework

The RSH states that Registered Providers shall clearly set out, and be able to give reasons for, the criteria they use for excluding actual and potential tenants from consideration for allocations, mobility or mutual exchange schemes. It also requires Registered Providers to develop and deliver letting processes in a way which supports their effective use by the full range of actual and potential tenants, including those with support needs, those who do not speak English as a first language and others who have difficulties with written English.

In addition, we are guided by the specifics of housing law, including, but not limited to:

- ◆ Housing Act 1988 – the legislation that governs the law between landlords and tenants. The Act introduced the concepts of assured and assured shorthold tenancies.
- ◆ Housing Act 1996 – the legislation that regulates the provision and allocation of rented housing in England.
- ◆ Localism Act 2011 – the Act which changes the powers of local government in England and ensures that decisions about housing are made locally.
- ◆ Homelessness Act 2002 – the legislation that amends the Housing Act 1996 and sets out duties of local housing authorities to help people who are homeless or at risk of homelessness.
- ◆ Equality Act 2010 – the legislation which outlaws direct discrimination, indirect discrimination, harassment and victimization. Housing providers must not discriminate against any person who has a protected characteristic.
- ◆ UK Data Protection Act 2018 – the legislation which updates data protection laws in the UK and implements the EU General Data Protection Regulations (GDPR).
- ◆ Human Rights Act 1998 – the legislation that protects our basic rights and freedoms in the UK, which includes the protection of family life and home.
- ◆ The Welfare Reform Act 2012 – the legislation made changes to rules concerning a number of benefits and the introduction of Universal Credit and Personal Independence Payments.
- ◆ The Prevention of Social Housing Fraud Act 2013 – the legislation which creates offenses relating to sub-letting and parting with social housing.

13. Information Sharing and Confidentiality

We will provide information as required in line with relevant law and regulation.

We collect information (personal data) to enable us to:

- ◆ manage and support our relationship with customers to comply with legal obligations

- ◆ improve our services
- ◆ achieve our legitimate business aims

We are committed to complying with data protection legislation when handling data.

Customers have rights including access to their data and to object to the way it is processed. For more information on how and why we process customer data and how customers can exercise their rights please view our full Privacy Policy on our website at [Privacy notice – GreenSquareAccord](#).