

POLICY AIMS

- 1.0 To be fair, transparent and consistent in the allocation of GWHA properties.
- 1.1 To ensure that the allocations process helps to achieve balanced and sustainable communities.
- 1.2 To ensure those assessed as being in most housing need are prioritised.
- 1.3 To facilitate effective partnership working.
- 1.4 To mitigate risk, comply with relevant legislation, best practice and guiding standards.

2.0 CONTEXT

- 2.1 The provision of a high standard of affordable housing for rent, for those in housing need, is integral to the delivery of GWHA's vision of shaping thriving communities.
- 2.2 The association's housing stock is clustered in specific areas of the city centre and west end of Glasgow; just over 20% of stock is multi storey one bedroom flats with a city centre location, a further 20% are deck access properties situated in Finnieston and Hyndland and the remaining 60% is primarily rehabilitated or new build tenemental flats located in the G3, G11, G12 and G20 areas.
- 2.3 With its popular position in the west of the city, the area is serviced by excellent local amenities and transport links. Local services are valued, work accessibility is good and there is considerable neighbourhood and community attachment. Consequently, demand for GWHA's accommodation far outstrips both stock availability and turnover, and offers of accommodation will be available to approximately just 10% of those who apply for housing. With this in mind, it is important to note that a right to apply for housing does not equate to the right to receive an offer of housing.

3.0 COMPLIANCE ([Appendix 4](#))

4.0 RISK ([Appendix 5](#))

5.0 EQUALITIES ([Appendix 6](#))

6.0 STRATEGY

- 6.1 The HAP sits within the Community Sustainment Strategy, with close links to the Void Management Strategy and with direction through the Housing Needs Analysis. Initiatives are introduced through the Corporate Plan *Enhanced Services* driver to move the Association towards its vision of shaping thriving communities; and include sensitive lets ([Appendix 2](#)) and letting initiatives ([Appendix 3](#)) in clearly defined circumstances; partnership working with other RSLs¹ and the LA² to increase ease of access to a variety of housing options; active participation in the development of a common housing register; and supporting the Housing Access Team to deliver operational improvements in the homelessness referral system.

In addition to the needs of existing tenants and applicants, demographic trends and local circumstances are considered in determining future housing provision and tenure.

7.0 ACCESS TO GWHA HOUSING

- 7.1 GWHA is committed to ensuring that the allocation process supports our objective of creating thriving communities. Each financial year targets for the percentage of lets for each category will be set. These targets will take account of local housing need and I priorities, optimising opportunities and accessibility for homeless persons, existing tenants of GWHA and those who wish to apply for housing with GWHA.

7.2 Project/Development Priority

¹ Registered Social Landlord

² Local Authority

7.2.1 In the first instance, those affected by the Association's immediate development programme (i.e. those who have been temporarily decanted) will have priority in terms of rehousing. Thereafter, tenants of future development projects will be given priority to reflect the stage in the development programme.

7.2.2 Once the needs of the current projects have been met, recourse will be made to the Housing Register in accordance with current projections.

7.3 Housing Register

7.3.1 The Housing Register consists of three separate Lists as noted in sections 7.4 – 7.6. Housing Application Forms (HAF) will be assessed according to each applicant's individual circumstances, and the HAF will be placed on the relevant List.

7.3.2 GWHA will assess Housing and Transfer list applications using the points framework outlined at Appendix 1. Applicants will be placed on the housing list in order of the applicant with the highest combined points total (reflecting level of housing need).

7.3.3 Where more than one applicant has the same level of points, the date of application for housing will be used to determine the priority placing on the list.

7.4 Homeless List (HML)

Whilst the statutory duty to find permanent, secure accommodation lies, at all times, with the Local Authority, GWHA accepts it has an important role in assisting the Local Authority in discharging its housing obligations in line with the Housing (Scotland) Act 2001 and the Homelessness etc (Scotland) Act 2003. Referrals for homeless applicants will be managed in adherence to Section 5 of the 2001 Act, and in accordance with Glasgow City Council's Homelessness Duty Protocol. The following Applicants will be admitted to the HML:

(a) Homeless applicants

Applicants whom the Local Authority has assessed as homeless, or threatened with homelessness, who have an unmet housing need, and for whom the Local Authority has accepted a statutory duty to source permanent accommodation.

(b) H.M. Forces

Applicants who have completed a minimum of three years' service or have been injured in action, or have been discharged on medical grounds.

Priority under this category will be awarded where the applicant has provided their 'Certificate of Cessation of Entitlement to Occupy Service Accommodation', Notice to Vacate, and confirmation of their date of discharge and the period of their service either in the form of a letter from a senior officer or by providing a copy of their certificate of discharge.

7.4.1 Applicants placed on the HML are:

- i. Considered to have the highest priority for housing and will be placed solely according to the date of the application (as awarded by the Local Authority) or the date H.M. Forces priority was awarded and not on the basis of an award of points;
- ii. Eligible to receive one offer of housing. In the event this offer is refused the HAF will be removed from the HML and the application will be placed on the Housing List, and assessed in accordance with the points framework relative to other applications for housing. Housing List applicants are entitled to receive two offers of housing. The refused HML offer will not count as the first of two refusals.

The Local Authority will discharge their legal duty under the relevant homeless legislation where one reasonable offer of housing has been made to the applicant.

7.5 Internal Transfer List (ITL)

Applicants will be placed on this list if they are a current GWHA Tenant. GWHA will assess Internal Transfer Applications using the points framework outlined at Appendix 1.

Transfer applications are assessed on the same basis of housing need as other applicants, although it is recognised that existing tenants are unlikely to be able to compete with external applicants and, in terms of housing need points, may never be a priority. To ensure that existing tenants do have opportunities to move to more appropriate housing, the Association aim to allocate a proportion of annual lets to this group.

Transfer applications will be expected to comply with GWHA's HAP including the Access Criteria outlined at Section 9.0.

7.6 Housing List (HSL)

Applicants will be placed on this list if they fall within any of the following categories, or if their circumstances do not qualify them to be placed on the Homeless or Internal Transfer List:

- (a) A Tenant of another Registered Social Landlord or Local Authority;
- (b) A sub-tenant or lodger;
- (c) Living care of relatives, friends or others;
- (d) An owner occupier;
- (e) Individuals living in housing of multiple occupation (HMO);
- (f) Have a short assured tenancy, an assured tenancy or a private residential tenancy within the private sector.

7.7 Referrals and Partnership working

7.7.1 Consistent with the housing needs analysis, the Association will identify and prioritise particular needs from within its direct area of operation and from the wider population. Partnership working opportunities will be sought to support needs that cannot be met through other access measures. For example, in the case of wheelchair or specifically adapted accommodation, referrals may be sought from organisations such as Blackwood Homes, Glasgow Centre for Inclusive Living or Glasgow's Health and Social Care Partnership (HSCP). In the case of housing for older people, referrals may be sought from Yorkhill Housing Association who operate a housing list for their 'retirement homes'.

8.0 EXTERNAL TRANSFERS OR EXCHANGES

8.1 Mutual Exchanges

8.1.1 Tenants have a right, in accordance within Section 33 of the Housing (Scotland) Act 2001 to exchange their house with another tenant, providing that both parties hold Scottish Secure Tenancies, and that the landlords of both tenants have given their consent in writing.

8.1.2 Exchanges will not generally be permitted where:

- (a) There are outstanding rent arrears or other tenancy debts
- (b) The GWHA property is within an immediate development programme (i.e. either on site or due to go on site within a year).
- (c) GWHA has reasonable justification that the mutual exchange request results from a financial inducement being offered to one (or both) parties.
- (d) a Decree has been obtained or a Notice of Proceedings for Recovery of Possession of the Property has been served
- (e) GWHA's property has been adapted for particular needs and the exchange would result in no-one with such needs occupying the property.

8.1.3 Permission to exchange will generally be granted where it is demonstrated that:

- (a) both parties would benefit from the exchange
- (b) overcrowding would not occur (account may be taken of the constraints on GWHA's housing stock and of the household requirements).
- (c) underoccupancy would not occur (account may be taken of medical/social factors presented).
- (d) the tenancy record of the incoming tenant is satisfactory.
- (e) there is compliance with the "Access Criteria" (section 7.0)

- (f) both parties intend to permanently reside at the new accommodation. (Further applications to exchange or transfer will not be accepted unless there is a substantial change in the tenant's circumstances.)

8.1 HOMESWAPPER

GWAHA recognise that there will be instances whereby existing tenants will request assistance in securing accommodation out with the Association's area of operation. In recognition of this, and to optimise the opportunities for those tenants to be rehoused, GWAHA will positively promote and publicise the scheme operated by HOMESWAPPER and will assist tenants to access this scheme.

9.0 ACCESS CRITERIA: ELIGIBILITY

9.1 Continuous opportunity is available for applicants to be assessed for rehousing. Admission to the housing register is open to:

- (a) Any individual aged 16 years or older, provided they are not prevented from doing so by immigration or any other relevant legislation.
- (b) Amenity applicants must be at least 55 years old, or suffering from a medical condition that will be alleviated by a move to alternative accommodation.

9.2 Applicants for alternative forms of tenure including Shared Ownership, Homestake and MMR must meet the criteria specified within those policies.

9.3 Applicants for supported accommodation projects must have a support need that will be met at the project.

9.4 In circumstances whereby two or more persons wish to submit a joint application for housing, the housing application will be assessed on the combined housing needs of the household(s) wishing to move.

9.5 Property Ownership

9.5.1 Property ownership will not, in itself, disbar an application for rehousing. In such instances applications will be assessed, consistent with other applications for housing, although permanent rehousing may only be considered where it is demonstrated that the circumstances are that:

- (a) In the case of a property which has not been let, the owner cannot secure entry to that property; **OR**
- (b) It is probable that the occupation of the property will lead to abuse (within the meaning of the Protection from Abuse (Scotland) Act 2001) from some other person residing in that property; **OR**
- (c) It is probable that occupation of it will lead to abuse (within the meaning of the Act) from some other person who previously resided with that person, whether in that property or elsewhere; **OR**
- (d) Occupation of the property may endanger the health of the occupants and there are no reasonable steps which can be taken by the applicant to prevent that danger.

9.5.2 In all other circumstances, a Short Scottish Secure Tenancy may be granted to home owners in accordance with section 7A (1) of the Housing (Scotland) Act 2014:

- (a) The house is to be let expressly on a temporary basis to a person pending the making of arrangements in relation to a property which will allow the person's housing needs to be met.

10.0 ACCESS CRITERIA: RESTRICTIONS

10.1 In the undernoted circumstances, GWAHA will restrict access to its housing. In all cases, the Applicant will be notified of the reason for the decision and of the right of appeal. The MC will receive an annual report outlining the number of cases falling within these categories.

10.2 Deliberate Overcrowding of GWAHA property

To discourage applicants staying “care of” GWHHA properties and causing overcrowding (which can lead to the attendant problems of excess refuse, wear & tear, condensation & dampness, noise transference, deterioration in neighbour relations and more serious issues of infestations points will not be awarded in instances where an applicant is residing in a GWHHA property which constitutes a breach of tenancy

10.3 Support Requirements

Where the Association consider that a risk assessment is necessary, or that the Applicant requires a structured programme of support in order to sustain an independent tenancy and/or to minimise potential risk to GWHHA property and/or other members of the community, appropriate action must be taken to address these issues prior to any offer of rehousing. GWHHA may not make an offer of rehousing in instances where a risk assessment is refused and/or where support is refused or is unavailable.

10.4 Arrears

- 10.4.1 The existence of arrears will not in itself prevent a housing allocation, however, where arrears exist, the Association will establish, what, if any, arrangements exist between the Applicant and the current Landlord.
- 10.4.2 An offer of accommodation may not be made to the Applicant unless it is demonstrated that a repayment arrangement has been adhered to for a reasonable period of time (i.e. a minimum of 3 months) or it can be clearly shown by the Applicant that there are exceptional circumstances.
- 10.4.3 An offer would not be made where monies are owed by the applicant to the Association or legal proceedings have been raised against the applicant by the Association. However, no account will be taken of:
- (a) any outstanding liability attributable to a house of which the Applicant is not the tenant.
 - (b) arrears accrued by the Applicant that amount to less than one month's rent.
 - (c) debts that are not tenancy related debts (with the exception of monies owed to GWHHA)

10.5 Breach of Tenancy/Occupancy Obligations

- 10.5.1 Whilst an application for rehousing will be accepted, where an Applicant's occupancy of a property has been ended for a serious breach of the occupancy obligations (e.g. serious anti-social behaviour), no offer will be made for a period of 3 years.
- 10.5.2 This restriction will not apply where the Applicant is able to demonstrate, to the Association's satisfaction, through the involvement of other parties, that the issue has been resolved or ongoing support mechanisms have been put in place.
- 10.5.3 Where rehousing is offered, the Applicant may be offered accommodation on a Short Scottish Secure Tenancy Agreement.

10.6 Conduct

- 10.6.1 GWHHA will, at all times, endeavour to provide the highest quality information and advice to Housing Applicants in line with the Service Quality Guarantee.
- 10.6.2 In the event a Housing Applicant is verbally or physically abusive to a Committee Member, Officer, Representative, or Employee of the Association, the Association may consider excluding or suspending the Application for Rehousing.

10.7 False/Misleading Information

- 10.7.1 Where an Applicant is found to have benefited by withholding relevant information or from providing false or misleading information any offer of accommodation will be immediately withdrawn and the application will be suspended for a period of 6 months.
- 10.7.2 In instances where a Tenancy has been signed, the Association will consider the instigation of legal proceedings for recovery of the Tenancy. The Tenant will not be reconsidered by the Association for rehousing for a period of three years.

10.8 Suspensions

10.8.1 Internal Transfer List and Housing List HAFs will be suspended for a period of six months in the undernoted circumstances:

- (a) Refusal of two reasonable offers of housing within a three year period.
- (b) Tenancy related debt – where the Applicant has rent arrears or any other tenancy related debt (rechargeable repairs/service charges) for any current or former property for which they were the tenant. Exceptions to this would be made where
 - i. The debt has been paid off in full;
 - ii. The level of debt is equivalent to, or less than, one month's rent;
 - iii. An agreement has been made to pay the debt and has been maintained for at least three months, and is continuing.
- (c) The applicant has been verbally or physically abusive to a GWHA staff member, representative, contractor or Management Committee Member.
- (d) The Applicant has provided false or misleading information – where the applicant has deliberately misrepresented information in order to gain advantage over other applicants in housing need. In instances where a Tenancy Agreement has been signed, the Association will consider the instigation of legal proceedings for recovery of the Tenancy, following which the Applicant would not be reconsidered for housing by GWHA for a period of three years.

10.8.2 HAFs will be suspended for a period of three years where:

- (a) The applicant's occupancy of a property has been ended for a serious breach of the occupancy obligations (for example, serious anti-social behaviour).

This restriction will not apply where the applicant is able to demonstrate, to the Association's satisfaction, through the involvement of other parties, that the issue has been resolved or ongoing support mechanisms have been put in place.

10.8.3 In all cases, the suspension of a HAF will be confirmed in writing and will contain information regarding the reason(s) for the suspension, the period of the suspension and the applicant's right of appeal.

10.8.4 Suspensions will be reviewed by GWHA upon expiration of the agreed period, at which point more information may be sought from the applicant. A further suspension may be applied following review in accordance with the above noted suspension criteria. The onus will always rest with the Applicant to notify GWHA of any change relating to their reason for suspension.

10.8.5 In cases of suspension where an offer of housing has been made, the offer will be immediately withdrawn. A suspension will not in itself affect the applicant's points award.

11.0 GWHA OCCUPANCY STANDARD

11.1 The standard set out below is used to determine the number of rooms an applicant and their household requires.

11.1.1 One bedroom is required by:

- (a) A single person aged 14 years and over;
- (b) A couple;
- (c) Two children of the opposite sex where one or both is aged eight years or over, in which case each child will require a separate bedroom;
- (d) Two children of the same sex under 14 years, unless the age difference is 10 years or more.

11.2 Due to the diverse nature of GWHA housing stock, consideration will, where appropriate, be given to distinguishing between bedrooms and bed spaces in order to best fulfil housing need, and make the best use of housing stock (e.g. bedroom capacity in traditional tenement properties may be more generous than that of new build properties).

11.3 Applicants will be admitted to the list for only the size of property for which they are eligible, in accordance GWHA's Occupancy Standard. Due to demand, GWHA does not permit under-occupancy within its housing stock.

11.4 Additionally, the following criteria will apply:

- (a) If an applicant is living in an overcrowded situation and GWHA does not own accommodation of the size required, the applicant *may* be considered for accommodation which is smaller than their needs so

long as it eases the overcrowding by at least one bed space. Exceptions of this nature must be approved by the Tenancy Services Manager and will be explicitly defined in the offer of accommodation.

- (b) Where applicants have equal or majority access to a child(ren), the child(ren) will be assessed as permanent members of the household in accordance with GWA occupancy standard. Where the residence and contact arrangements have been made formally through the court or a lawyer, copies of the court agreement or lawyer's letter should accompany the application.

11.5 Additional bedroom requirements

11.5.1 There are some circumstances in which an additional bedroom may be awarded:

- (a) **Expectant mothers:**
Applicants should provide proof of pregnancy in support of their application, and will be eligible for the size of property which will be required by the expanded household.
- (b) **Overnight access to children:**
Only one additional bedroom will be permitted, irrespective of the number of children the applicant has access to.
- (c) **Fostering and adopting children**
Applicants currently being assessed for suitability to foster or adopt will be eligible for the size of property which will be required by the expanded household.
- (d) **Medical need for additional bedroom**
Where medical evidence has been provided which documents the need for an additional bedroom (such examples may include persons who require an additional room to receive medical treatment at home, or have a development disability such as Autism Spectrum Disorder that would have an adverse impact on another child who shares a bedroom).
- (e) **Part-time occupants**
Where a household includes an individual who is absent from the home for regular or pro-longed periods of time (such examples may include off-shore workers, children studying at University, armed forces etc.) then they will be treated as a permanent member where the property continues to be their only or principal home.
- (f) **GWA under-occupation**
Internal transfer applicants occupying larger GWA accommodation (4Apt or above) may apply for one bedroom greater than their need (as assessed against GWA occupancy standard) to ensure best use of housing stock through increase in turnover of larger-sized accommodation³.

12.0 MANAGEMENT PROCEDURES: APPLICATIONS FOR HOUSING

- 12.1 Applicants must complete a HAF to facilitate an assessment of housing need, and to enable the award of points in line with the HAP.
- 12.2 HAFs can be accessed from GWA's offices in person, or by requesting a form by telephone, in writing, email, or via the website.
- 12.3 Applicants who require information in a different format should contact the office to discuss how their needs can best be met.
- 12.4 Staff appointments to assist with the completion of a HAF, or the provision of housing options advice, are available on request.
- 12.5 The onus will always rest with the applicant to notify GWA, in writing, of any change in circumstances. Such examples may include
 - (a) Change of address and/or contact details
 - (b) If someone leaves or joins the household
 - (c) If a member of the household reaches either eight or sixteen years of age

³ As agreed by MC on 15/11/2016

- (d) Change of preferences specified in the HAF
- 12.6 GWHA reserve the right to request confirmation of any information in respect of an application for housing, and to postpone admission to the housing register, or suspend/reject applications where a satisfactory response has not been provided. Prior to an offer of housing being made, tenancy references will generally be sought for Applicants with a current or previous social tenancy.

12.7 Areas of choice

- 12.7.1 At the point of application, information is provided in relation to GWHA stock demand and turnover: The HAF contains an area selection form in which the housing stock has been divided to show stock type per street. Applicants are permitted to select as many letting areas as they wish to optimise opportunities for rehousing.

13.0 MANAGEMENT PROCEDURES: OFFERS OF TENANCY

13.1 General

- 13.1.1 GWHA will consider an offer of housing to be reasonable if it meets the preferences stated on the Resettlement Plan (Homeless List Applicants) or the HAF (Internal Transfer and Housing List Applicants).
- 13.1.2 Before an offer of housing is made, an account of the Applicant's individual needs and circumstances, the effective use of housing stock and any impact on the wider community will be taken. However, it should be noted that the overall objective is to address housing need in accordance with the policy.
- 13.1.3 Prior to an offer of housing being made, tenancy references will generally be sought for applicants with a current or previous social tenancy.
- 13.1.4 A Scottish Secure Tenancy Agreement reflecting the terms of the Housing (Scotland) Act 2014 will be offered to prospective tenants, with the exception of the following circumstances whereby a *Short Scottish Secure Tenancy* may be offered:
- "where any of the following persons have, in the preceding three years acted in an anti-social⁴ manner in relation to another person in their locality, or pursued a course of conduct⁵ amounting to harassment of another person":
- (a) The applicant; OR
 - (b) Any joint applicant; OR
 - (c) A visitor of the applicant; OR
 - (d) A person who it is proposed will reside with the applicant.

"The house is to be let expressly on a temporary basis to a person pending the making of arrangements in relation to a property which will allow the person's housing needs to be met."

13.2 Homeless List (HML) Applicants

- 13.2.1 Offers of housing will be made to the applicant with the earliest application date.
- 13.2.2 HML Applicants will receive one offer of housing which meets the preferences as specified by their Homeless Caseworker on their resettlement plan, based on the following:
- (a) GWHA has been selected as a preferred landlord;
 - (b) Size of property required;
 - (c) Any restrictions to the type of property required;
 - (d) Any other specific requirements.
- 13.2.3 If the applicant refuses an offer of housing, GWHA will notify the Local Authority, who may choose to discharge their statutory homelessness duty. The applicant will be encouraged to contact their Homeless Caseworker for information relating to their homeless application in the event of an offer refusal. All appeals relating to the reasonableness of a homeless offer of housing should be directed to the Local Authority.

⁴ An action or course of conduct causing, or likely to cause alarm, distress, nuisance or annoyance

⁵ Conduct includes speech, and a course of conduct describe two occasions or more

13.2.4 Where a reasonable offer is refused, a new HAF may be completed by the applicant. Upon assessment, they will be placed within the Housing List, allocated points in accordance with the points framework set out in Appendix 1, and the applicant will be eligible to receive a further two offers in accordance with section 13.3 of this policy.

13.3 Internal Transfer List (ITL) and Housing List (HSL) Applicants

13.3.1 Offers of housing will be made to the applicant with the highest points award for that property. In the event two or more applicants have the same level of points, the offer will be made to the applicant with the earliest application date.

13.3.2 If two internal applicants have the same level of points and the same application date, the offer will be made to the applicant who is also a member of the Rent Reward Scheme.

13.3.3 Applicants will be eligible to receive up to two offers of housing which meet the preferences as stated on their housing application, based on the following:

- (a) Area of choice;
- (b) Size / type of property;
- (c) Any other specific requirements.

13.3.4 If the applicant refuses an offer of housing, GWHA staff will contact them to discuss their application preferences and housing requirements in more detail. It is GWHA's aim to provide relevant housing advice and information on supply, turnover and demand to ensure informed choices about housing preferences are made.

13.3.5 If a second reasonable offer is refused, the application will be suspended for a period of six months. At the end of this period, the application will be re-instated and the applicant will be eligible to receive a further two offers.

14.0 MANAGEMENT PROCEDURES: CANCELLATIONS

14.1 Cancellations

14.1.1 HAFs will be cancelled in the undernoted circumstances:

- (a) The Applicant has requested, in writing, that their HAF be removed from the register;
- (b) The Applicant is deceased;
- (c) The Applicant has failed to respond to the annual review of their HAF;
- (d) The Applicant has failed to respond to at least three items of correspondence from GWHA about the housing register;
- (e) The Applicant's housing need has been met, either by GWHA, another housing provider, by Mutual Exchange, or as a result of purchasing a property;
- (f) GWHA has established that the Applicant has no legal right to a tenancy.

14.1.2 In all cases, the cancellation will be confirmed in writing and will contain information about their right of appeal. If, following the cancellation of a HAF, the Applicant wishes to re-apply, a new HAF must be submitted for assessment.

15.0 DELEGATED AUTHORITY

15.1 GWHA's Management Committee will monitor and review this Policy, delegating authority to:

15.1.1 The Chief Executive: to ensure the implementation of the Policy and Procedures;

15.1.2 The Services Director: It is recognised that in exceptional circumstances, cases may still arise whereby the Points System cannot adequately deal with the situation and HOMESWAPPER/ RSL referral are not appropriate. In such cases, the Services Director may consider a direct housing allocation, out with the standard allocations framework, taking account of the Applicant's particular needs and the urgency of the situation; In this instance a report focussing on the circumstances (rather than the allocation) will be retrospectively made to the MC and amendment to the HAP will be considered to reflect.

15.1.3 The Tenancy Services Manager: to agree sensitive lets in line with criteria set out. (Appendix 2)

15.1.4 The Tenancy Services Team Leader to suspend/cancel applications in accordance with policy.

16.0 FEEDBACK, APPEALS AND COMPLAINTS

16.1 Feedback

GWHA Tenants and other customers may provide feedback about this document by emailing admin@glasgowwestha.co.uk

16.2 Appeals and Complaints

- 16.2.1 The procedures for dealing with appeals arising from Section 5 Referrals should be directed to the Local Authority and will be considered in accordance with the terms of the Homelessness Duty Protocol
- 16.2.2 In all other cases, applicants with a grievance arising from their application or decisions in the allocations process will be considered in accordance with the Comments and Complaints Policy.
- 16.2.3 Once the Association's Comments and Complaints Policy is exhausted, there is a right of appeal to the Scottish Public Services Ombudsman. The Ombudsman will be concerned with the proper application of the HAP.
- 16.2.4 Section 20B of the Housing (Scotland) Act 1987 gives applicants the right to appeal against their housing application suspension to the Sheriff by summary application within 21 calendar days from the date of suspension. Applicants are advised to seek legal advice, or assistance from an organisation such as Shelter Scotland or Citizens Advice Scotland.

17.0 PERFORMANCE INDICATORS

Advise applicant on outcome of HAF	3 weeks from receipt
Process reported changes in circumstances to existing housing application	2 weeks from receipt
Respond to written correspondence	1 week from receipt
Lettings Targets performance and PIs	Reported to MC 6-monthly
Cancellations, Suspensions and Appeals	Reported to MC 6-monthly
Sensitive Lets	Reported to MC 6-monthly
Policy Review	5 yearly: 2024

1.0 MEDICAL FACTORS

1.1 General

- 1.1.1 Medical Priority will be awarded only where an applicant's condition would be alleviated by a move to alternative accommodation. Having a medical condition will not in itself be grounds for an award of medical points.
- 1.1.2 Medical Priority will not be awarded in instances where mental health has been cited as being a need for rehousing if the stress or anxiety is deemed to be short-lived (e.g. bereavement) and/or related to a significant incident which has the prospect of being resolved through practical intervention (e.g. financial difficulties, rodent infestation etc.)
- 1.1.3 GWHHA reserves the right to seek additional medical information if there is insufficient information provided and/or if staff are ill-equipped to make an assessment of an individual's housing need(s) on account of their medical condition. The responsibility for providing requested information will lie with the applicant.
- 1.1.4 Where more than one member of the Applicant's household has a medical condition that would benefit from rehousing, the member most in need will receive full points and subsequent members of the household will receive half of the relevant points.
- 1.1.5 Where the medical situation relates to mobility, points will be awarded only where the Applicant accepts a move to a lower level and/or a more suitable property.

1.2 Medical Category

1.2.1 Category A - 45 points

The award of medical Category A points will be restricted to the following circumstances:

- a. The applicant, or a permanent member of their moving household, is currently awaiting hospital discharge, though cannot return to their own accommodation due to an enduring medical condition, and where their current accommodation cannot be adapted to meet their needs; **OR**
- b. Where the applicant is terminally ill and requires alternative accommodation as a matter of urgency, and where their current accommodation cannot be adapted to meet their needs.

1.2.2 Category B – 25 points

Medical points will only be awarded if:

- a. The applicant, or a permanent member of their moving household, has been assessed as having a medical condition; **AND**
- b. The present accommodation is wholly unsuitable in light of those medical needs and having a significant impact of their health; **AND**
- c. The home cannot be adapted and/or health/care support services cannot be provided to meet the applicant's needs.

2.0 TENURE SECURITY

2.1 General

- 2.1.1 Applicants will qualify for only 'Threatened with Homelessness' points **OR** 'Insecurity of Tenure' points as appropriate.

2.2 Threatened with Homelessness – 20 points

Points will be awarded if the applicant is at risk of losing their current accommodation. Such examples would include:

- a. Receipt of 'Notice to Quit' on non-conduct grounds;
- b. Receipt of a 'Notice of Proceedings for Recovery of Possession' on non-conduct grounds;
- c. Marriage or relationship breakdown;
- d. Domestic abuse;
- e. Experiencing harassment in current accommodation as linked to protected characteristics⁶;
- f. Statutory homeless applicants who, following admittance to the Homeless List, have refused one reasonable offer of housing and have been moved to the Housing List.

⁶ Age; disability; gender reassignment; race; religion or belief; sex; sexual orientation; marriage and civil partnership; pregnancy and maternity, as per the Equality Act 2010

2.3 Insecurity of Tenure – 5 points (available to Housing List applicants only)

Insecurity of tenure points will be awarded to applicants who do not have security of tenure. Points will not be awarded under this category to applicants who have a Scottish Secure Tenancy, an Assured Tenancy or a Private Residential Tenancy within the private rented sector, or those who own their own home.

3.0 SUPPORT**3.1 Support – 15 points**

3.1.1 Support points will be awarded if the applicant currently resides outwith the Glasgow area and requires to move to the area to receive specialist medical support which is available only within GWHA's area of operation (G3, G11, G12, G20).

3.1.2 All requests for support points must be substantiated. The responsibility for providing requested information will rest with the applicant.

4.0 HOUSEHOLD FORMATION**4.1 Household Formation – 15 points**

4.2 Points will be awarded where an Applicant wishes to reside with partner/family but is unable to do so because both of the existing properties are unsuitable.

4.3 Both applications will be assessed and the one with highest points accepted.

5.0 UNDEROCCUPATION**5.1 Under-occupancy – 10 points per non-occupied bedroom**

5.1.1 Points will be awarded for each bedroom not being occupied as a bedroom within their current home.

5.1.2 Under-occupancy points will be awarded if:

- a. The applicant and their household do not require all of the bedrooms in their current home; AND
- b. The applicant is a current social housing tenant

5.2 The HAF will be pointed on the basis of the number of bedrooms that the applicant's household requires in order to meet GWHA's occupancy standard as compared with their current living arrangement (i.e. a family who requires 2 bedrooms, and is currently residing in a 3 bedroom property would be awarded 10 points, whereas an applicant who requires 1 bedroom, and is currently residing in a 3 bedroom property would be awarded 20 points).

6.0 OVERCROWDING**6.1 Overcrowding – 10 points per extra bedroom required (up to a maximum of 40 points)**

6.1.1 Overcrowding points will be awarded to applicants who are currently occupying a property which is too small for their household needs as defined in the Housing Allocations Policy.

6.1.2 The HAF will be pointed on the basis of the number of bedrooms that the applicant's household requires in order to meet GWHA's occupancy standard as compared with their current living arrangement (i.e. a family who requires 3 bedrooms, and is currently residing in a 2 bedroom property would be awarded 10 points, whereas a family who requires 3 bedrooms, and is currently residing in a 1 bedroom property would be awarded 20 points).

6.1.3 Applicants who occupy bedsit or studio accommodation (i.e. without separate bedroom) will not be considered to be overcrowded due a lack of separate bedroom alone (eg. a single occupant who lives in bedsit/studio accommodation will not be considered as overcrowded in the current accommodation and therefore no award of points will be granted under this category).

6.1.4 It should be noted that applicants who have allowed their property to become overcrowded, in breach of their tenancy agreement will not be eligible to receive overcrowding points. This does not apply where a family has expanded through marriage, child-birth, custody changes, fostering or adoption. This information will be verified through tenancy references.

7.0 PROPERTY TRANSITION

7.1 **Property Transition – 10 points** (available to Internal Transfer List applicants only)

7.2 Property Transition points will be awarded to Internal Transfer List applicants who have resided in GWHAs bedsit, mezzanine or basement accommodation for two years or more.

7.3 Only one set of property transition points will be awarded after the minimum residency period has been reached.

8.0 CONDITION OF PROPERTY**8.1 Extreme Fuel Poverty – 15 points**

8.1.1 Extreme fuel poverty points will be awarded where it can be evidenced that:

- a. The applicant's current accommodation's Energy Performance Certificate (EPC) rating is E or F; **AND**
- b. The cost of heating their home is equal to or exceeds 20% of the household income; **AND**
- c. Proof of utility comparison which shows the applicant to be on the most affordable tariff.

8.2 Fuel Poverty – 7 points

Fuel poverty points will be awarded where it can be evidenced that:

- a. The cost of heating the applicant's home is more than 10% of the household income; **AND**
- b. Proof of utility comparison which shows the applicant to be on the most affordable tariff.

8.3 Disrepair – 8 points

8.3.1 Disrepair points will be awarded if the applicant's current accommodation meets one of the following standards of disrepair:

- a. Confirmed severe dampness or direct water penetration (i.e. visible evidence of rising or penetrating dampness (mould or water stains) in at least two rooms within the property); **OR**
- b. Where the Local Authority provides confirmation of a severe and ongoing rodent and/or insect infestation, a consequence of which GWHAs assesses the property as uninhabitable. In such instances, the applicant must demonstrate proactive engagement and full co-operation with advice/actions to facilitate prompt treatments and resolution of the infestation.

8.3.2 It should be noted that where disrepair is determined to be due to, or exacerbated by, misuse, neglect or improper conduct on the applicant's part, the applicant will not qualify for points under this category. Examples of applicants who may be considered ineligible include:

- a. Those who have failed to comply with Local Authority advice or instruction to resolve the matter;
- b. Poor household hygiene playing a role in the disrepair/condition of property.

8.3.1 The examples provided are not exhaustive and circumstances will be considered on an individual basis.

8.4 Lacking Facilities – 4 points per facility lacking

8.4.1 Lacking facilities points will be awarded if the applicant's current accommodation lacks certain basic facilities.

8.4.2 Applicants will receive points under this category only if they can demonstrate that their accommodation lacks, or they, as a long term measure, are unable to access:

- a. Internal WC
- b. Washing Facilities (i.e. no bath or shower)
- c. Piped Hot Water in bathroom and/or kitchen
- d. Separate Kitchen
- e. Adequate internal heating (i.e. no heating facilities in living room and every bedroom – heating facilities will include gas central heating radiators, fixed electric heating appliances, gas fires and solid fuel fires)
- f. Double glazed windows
- g. Exclusive use of kitchen, bathroom and/or living room area for those living in a house of multiple occupancy (HMO)

8.4.3 It should be noted that where any of the above facilities are inaccessible due to temporary works, lacking facilities points will not be awarded.

Taking into account housing mix and circumstances of existing households (and in accordance with the Association's aim of achieving a balanced and sustainable community), sensitive lets will apply in respect of the undernoted:

- a) densely populated buildings:
(27 Derby Street, 22 Hillhead Street and 27 St Vincent Crescent)
- b) flats/buildings which, due to their position in the development, might exacerbate an Applicant's vulnerability.
- c) buildings where there is a recorded history of anti-social behaviour as a result of a current (or recent) tenant's conduct/vulnerability.

In the event a void property falls within one of the above categories (and the intention is not to allocate to the person in greatest housing need (in terms of points)) prior approval is required by the Tenancy Services Manager.

Evidence must be provided to support the decision to by-pass Applicants with greater housing need points.

In all cases, the allocation must be to an Applicant who has been accepted to the Association's housing register.

The Tenancy Services Manager must approve all sensitive lets and the MC will receive reports 6 monthly outlining the number of allocations within the category of "sensitive let".

LETTINGS INITIATIVE: BLYTHSWOOD COURT**1.0 FRAMEWORK**

1.1 This initiative, which sits within the community sustainment strategy, is a key objective of the 2012/13 Corporate Plan, embracing *Enhanced Customer Service* and *Optimum Performance* drivers. It will be delivered through flexibility in the HAP⁷ and Void Management Strategy and aims to contribute to the delivery of GWHAs vision of *Shaping Thriving Communities*.

2.0 AIMS

- 2.1 To create a balanced and sustainable community.
- 2.2 To encourage community responsibility and support for GWHAs vision, aims and objectives.
- 2.3 To improve void performance, reducing rent loss, repairs costs, re-let times and refusal rates.
- 2.4 To foster positive attitudes/perceptions and increase demand for the properties.
- 2.5 To ensure compliance with legislation, guiding standards and best practice.
- 2.6 To minimise risk.

3.0 CONTEXT

- 3.1 The Blythswood Court properties, which are the focus of this Lettings Initiative, were transferred to GWHAs on 27/06/11 in the process known as 2ST⁸. The 323 flats, in three high rise buildings, are exclusively 2 apartment in size; are situated in a prime location off Argyle Street in the City Centre, and boast excellent transport links and access to local facilities and amenities. Prior to transfer, the properties benefitted from substantial refurbishment works⁹ and will be further enhanced over the next 12-18 months with lift replacement works and upgrades to the entrance foyers¹⁰. A 24-hour concierge service, based in the Dalriada building, links the three properties with CCTV and a call-system, providing valuable on-site customer services and security for the residents.
- 3.2 Within this backdrop, accommodation, provided at affordable rent levels, should be highly desirable, however, the reality for Blythswood is quite different, with historically poor housing policy decisions leaving GWHAs with a legacy of low demand properties, and a community profiled by a concentration of single male households (76%), benefit reliance (69%), drug and alcohol dependency and mental ill health, which combine to create a pressure pot of anti-social and disruptive behaviour¹¹ and place the long-term sustainability of the community at risk.
- 3.3 With this multitude of factors, a strategy that focuses on a rebranding of the stock is crucial to the delivery of GWHAs vision of *shaping thriving communities*. Reversing the trends of the past decade through a sensitive lettings initiative will be a key part of this and will be implemented alongside partnerships that provide effective and targeted support to the existing vulnerable households and measures that ensure a zero tolerance approach to incidents of anti-social behaviour and criminality.

4.0 TRENDS ANALYSIS

⁷ Housing Allocations Policy

⁸ Second Stage Transfer

⁹ External cladding and upgrading of verandas, kitchen, bathroom and boiler replacements and rewiring works.

¹⁰ Particularly crucial at 323/421 in terms "1st impressions"

¹¹ Noise, parties, fighting, fire-raising, urinating in stairwells/landings, drug dealing, from tenants and visitors

Block	Female	Male	HB Reliance
56	32%	68%	71%
323	19%	81%	62%
421	22%	78%	73%
TOTAL	24%	76%	69%
Traditional GWA stock			59%

Aug 11 – Mar 12			Apr – Sep 12		
Block	No Voids	Days to Relet ¹²	Block	No Voids	Days to Relet
56	4	17	56	5	32
323	4	23	323	8	19
421	6	19	421	6	30
TOTAL	14	20	TOTAL	19	26
Traditional GWA stock	19	11		21	16

At 26 days, the void turnaround times for Blythswood are currently 38% higher than the average for GWA stock and refusal rates???. The levels

5.0 COMPLIANCE

5.1 Legislation

This initiative sits within the Housing Allocations Policy, complying with the terms of associated legislation, including the Housing (Scotland) Acts 1987 and 2001, the Human Rights Act 1998, the Homelessness etc (Scotland) Act 2003 and the Equalities Act 2010.

5.2 Scottish Social Housing Charter

Outcomes: 1 (Equalities); 3 (Participation); 7-9 (Housing Options); 10 (Access to social housing); 11 (Tenancy Sustainment) and 12 (Homeless people)

5.3 Research/Good Practice

In particular, the SG’s commissioned research “Tensions between Allocations Policy and Practice” and “Improving Access and Maximising Choice: The Applicant’s Perspective of Allocations Schemes” and the recommendations regarding guidance for local lettings initiatives.

6.0 RISK SCHEDULE (Appendix 1)

6.1 GWA’s HAP prioritises applicants in the greatest housing need, in line with legislation, guiding standards and good practice. However, with the concentration of 2 apt properties at Blythswood, the higher levels of homelessness amongst single male households, and the priority awarded to homeless households in the HAP, the application of our policy in Blythswood conflicts with, and places at risk, our aim of creating balanced and sustainable communities. This and other risks are explored via the schedule at Appendix 1.

6.2 The longer term benefits of the Initiative are evident, however, there will be a budget impact of c. £25-£30k over the 5 years, in particular the tenancy sustainment initiative and lettings committee

7.0 EQUALITIES IMPACT ASSESSMENT (Appendix 2)

8.0 LETTINGS INITIATIVE

¹² Average

8.1 Housing Applications

- 8.1.1 A separate Housing List will be held to readily identify housing applicants interested in rehousing within the Blythswood properties.
- 8.1.2 Female and couple households will be prioritised¹³ in 60% of allocations¹⁴, with additional priority in 80%¹⁵ of these cases to households that have been economically active for a period of at least 6 months¹⁶. All applicants offered rehousing will be expected to demonstrate a housing need as recognised by GWAH’s HAP.
- 8.1.3 The remaining 40% of allocations will be made through alternative access mechanisms¹⁷, with allocations to applicants in the greatest housing need, and with continuing endeavours, but not exclusivity, to females/couples and economically active households.

8.2 Promotion

- 8.2.1 To attract interest from the identified priority groups, a housing advice leaflet, promoting the Blythswood Initiative and GWAH service standards, will be circulated in city centre workplaces¹⁸.

8.3 Tenancy Sustainment Incentives

- 8.3.1 Tenancies created under the Blythswood Initiative will receive a 5% refund on rent paid at the end of each full year, for the first three years of the tenancy. This will be in addition to the Rent Reward Scheme incentives and is subject to full tenancy compliance.
- 8.3.2 In addition to the routine settling-in visit for all tenancies, there will be contact with the Blythswood Initiative tenants on a quarterly basis in the first 18 months, to ensure tenancy compliance and a prompt response to service delivery issues.

9.0 LETTINGS COMMITTEE

- 9.1 A Blythswood Lettings Committee will be established to foster community responsibility and support for GWAH’s vision, aims and objectives. All applicants for rehousing will be expected to meet with the Lettings Committee prior to being offered rehousing.
- 9.2 The Lettings Committee will share local information and knowledge with prospective applicants, with a view to building relations, and with the aim of encouraging active participation and engagement in the local community. Information about an applicant’s circumstances will not be made available to the Lettings Committee and all decisions regarding the allocation of housing will remain solely with GWAH.

10.0 IMPLEMENTATION STRATEGY

	Target	
Lettings Initiative consents ¹⁹	Nov 2012	
Community endorsement	Jan 2013	
Phase 1 ²⁰ Implementation	April 2013	
Lettings Committee interest/training	July 2013	

¹³ To address the gender imbalance

¹⁴ 60% of c. 40 allocations p/a = 24 p/a

¹⁵ 80% of c. 24 allocations p/a = 19 p/a

¹⁶ To address the economic imbalance

¹⁷ Housing List, Internal Transfers, Section 5 Referrals

¹⁸ Call Centres/City Regeneration/Hospitals/Schools

¹⁹ Management Committee/SHR

²⁰ Section 8

Phase 2 ²¹ Implementation	Aug 2013	
Phase 1 Review	Sept 2013	

11.0 PERFORMANCE INDICATORS

To redress the imbalance in gender and economic profiles through housing allocations will require a sensitive lettings initiative for an initial period of around 5 years, based on turnover of 12% per annum and indicators as described below:

	2013 ²²	2014	2015	2016	2017
% non-male households ²³	24%	32%	39%	47%	54%
% non-benefit households ²⁴	31%	37%	43%	49%	54%

Blythswood Initiative	2013	2014	2015	2016	2017
Days to Relet	26	22	18	16	14
No of tenants with RRS Membership ²⁵		15	28	44	59
Tenancy Sustainment levels ²⁶		90%	92%	93%	94%
% reduction in Stage 1 ASB					
% reduction in common repairs					

²¹ Section 9

²² Current profile of 245 male households (76%) and 223 households (69%) reliant on Housing Benefit

²³ Formula: 60% of 40 allocations p/a = 24. Year 2013 male h/hold figure of 245 reduced by 24 allocations p/a to 2016/17.

²⁴ Formula: 80% of 24 allocations p/a = 19. Year 2013 HB dep figure of 223 reduced by 19 p/a to 2016/17

²⁵ 80% of economically active households c. 19 p/a

²⁶ GWHA 2011/12 = 91.4%

RISK SCHEDULE: BLYTHSWOOD LETTINGS INITIATIVE

Appendix 1

HAZARD	RISKS	F	S	EXISTING CONTROLS	RESP	ADD CONTROL	RESP	REVIEW FREQ
Inability to address the current socio/economic imbalance GWA reputational impact	Lack of demand/interest from targeted groups	L	H	Promotion/marketing of Blythswood Initiative to city-centre workplaces / regeneration agencies/key worker initiatives Tenancy Sustainment incentives Programmed reviews to test effectiveness – Plan B? (short term /temp accommodation)	TSM SD	Review leases/TFFs within Blythswood to ensure fit with community sustainment objectives	TSM	
	Regulatory consent restricted/withheld	L	H	Compliance test Evidenced community support System audit review in advance of consent submission	SD			
	Rents unable to sustain the costs associated with Initiative ²⁷	L	H	Close monitoring of costs/budgetary impact Rent Policy Review	SD			
Challenges for the delivery of the changing attitude/culture/perception	Community resistance to the Initiative	L	H	Promotion of Initiative Training/development of Lettings Panel	TSM			
	Success of initiative threatened by ongoing ASB/issues from existing tenancies	L	M	Concierge service review ASB strategy/actions Tenancy Sustainment: quarterly contact arrangements	BDD	Targeted support for vulnerable h/holds	TSM	
Wider pressure on HAP/needs analysis	Increased demand from new Blythswood couple h/holds for rehousing to 3apts (family formation)	L	L	Housing Needs Analysis Programmed reviews to test impact/effectiveness of initiative	SD			

²⁷ Sustainment Incentives; increased void relet times/void loss whilst initiative is embedded; lettings panel training and ongoing support costs; promotional materials

EQUALITIES IMPACT ASSESSMENT (EQIA) : BLYTHSWOOD COURT LETTINGS INITIATIVE **Appendix 2**

Aims: To create a balanced and sustainable community

DIVERSITY	CITY PROFILE	GWAH PROFILE ²⁸	SENSITIVITY/ BARRIER	CURRENT MEASURES	ADDITIONAL CONTROLS	FURTHER ACTION REQUIRED	RISK ²⁹	TIMESCALE	LEAD
AGE	Increase in no. of children and reduction in elderly to 2016. From 2016-2026 significant increase in no. of people of retirement age, initially in <74 yrs but >74 yrs over 10 year period	15% < 35 38% < 55 18% < 65 29% > 65 70% of current tenants of working age	Applicants > 65 less likely to be economically active and therefore less likely to be eligible for 50% of allocations made through lettings initiative.	Access to Blythswood properties still available to >16's through routine access mechanisms ³⁰ Reasonable current representation of > 65s (29%)	Promotion of alternative access opportunities via agencies such as Age Concern	Close monitoring to ensure continued representation of all groups.	L		
DISABILITY	People with a disability currently under-represented in employment activities.	28% of existing h/holds with a disability	50% of new tenants to be economically active – potential access barrier for those with a disability	As above, opportunities via routine access mechanisms ²⁴	As Above: disability rights forum / employment agencies	As above	L		
RACE	Increase in inward migration: asylum seekers from Africa/Asia and economic migration from EU ³¹	30% BME	Language	Existing profile higher than community profile. Promotion of initiative through key agencies (e.g. PAIH, SRC)		As above	L		
RELIGION/ BELIEF		50% Christian, 3% Muslim, 14% no religion, 33% unanswered	N/A	N/A					

²⁸ Household Profiling Exercise currently underway : based on the 20% of forms returned from Blythswood court residents

²⁹ High/Medium/Low : Substantial/Some/Little or no.... evidence that particular groups/needs are not accommodated or are affected by policy/decision

³⁰ Section 5 Referrals, Housing List, Internal Transfers

³¹ European Union

GENDER	1 person h/hs to be in majority by 2020. Small inc in no. of families to 2016, thereafter decline in couple families with lone parent families the majority from 2016-2026.	76% males 24% females	Restricted access opportunities for single male households which tend to form significant % of homeless households	Positive action to create balanced community. Access for male households via routine measures ²⁴ Male couple households prioritised via lettings initiatives		Close monitoring to ensure representation of all groups	L		
SEXUAL ORIENTATION	LGBT groups make up about 5% of population	44% heterosexual 3% gay 53% unanswered	N/A	As above.			L		
TRANSGENDER	Majority of transgender cases male to female		Restricted access opportunities for single male h/holds	As above.			L		
DIVERSITY	CITY PROFILE	GWHA PROFILE	SENSITIVITY/ BARRIER	CURRENT MEASURES	ADDITIONAL CONTROLS	FURTHER ACTION REQUIRED	RISK	TIMESCALE	LEAD

	SELF ASSESSMENT AREA	COMPLIANCE	FURTHER ACTION	TARGET
HOUSING (SCOTLAND) ACT 2014	<p><u>Part 2: Social Housing ,Section 3</u> Section 3 amends section 20 of the 1987 Act to replace the existing categories of persons to whom social landlords must give reasonable preference when allocating social housing. It states that reasonable preference in allocations must be given to persons who are homeless or threatened with homelessness and persons who are living under unsatisfactory housing conditions, in each case where that individual has unmet housing needs. Reasonable preference must also be given to the tenants of any social landlord whom a social landlord considers to be under-occupying a property.</p>	<p>Policy section 7.4 outlines that homeless applicants will be assessed as separate list from transfer and housing applicants.</p> <p>Points system, Appendix 1 defines points criteria, which includes indicators of need through unsatisfactory housing conditions and under-occupancy.</p>	None	N/A
	<p><u>Part 2: Social Housing ,Section 4</u> Section 4 inserts new section 20A into the 1987 Act. New section 20A requires social landlords to consult (Applicants on its housing list; Tenants of the landlord; Registered Tenant organisations; and Such other persons as the landlord thinks fit) and prepare and publish a report on the consultation. When making or amending the allocation policy, subsection (2) amends section 21 of the 1987 Act to require social landlords to take account of any local housing strategy and any guidance issued by the Scottish Ministers.</p>	Details of consultation undertaken noted within consultation report at appendix 6.	Publish consultation report, as outlined in appendix 7 on GWA website	01/05/19
	<p><u>Part 2: Social Housing ,Section 5</u> Section 5 amends section 20 of the 1987 Act to ensure that social landlords take no account of the ownership of or value of heritable property owned by the applicant or by a person who lives with or who it is proposed will live with the applicant, in the following circumstances</p> <ol style="list-style-type: none"> a) the owner cannot secure entry to that property, b) it is probable that occupation of the property will lead to abuse from some other person residing in that property, c) it is probable that occupation of it will lead to abuse from some other person who previously resided with that person, whether in that property or elsewhere, d) occupation of the property may endanger the health of the occupants and there are no reasonable steps which can be taken by the applicant to prevent that danger. 	Policy section 9.5 mirrors legislative wording.	None	N/A
	<p><u>Part 2: Social Housing ,Section 6</u> Section 6 amends section 20 and inserts new section 20B in the 1987 Act to allow social landlords to impose a minimum period (suspension) before the applicant is eligible for the allocation of housing, if certain circumstances apply. Circumstances relate to Anti-Social Behaviour, Criminal Convictions, Orders of Repossession, previous Abandonment of Tenancy, outstanding liability (for payment of rent or otherwise) A minimum period requirement cannot be placed on homeless applicants to whom the local authority has a duty to provide settled accommodation (new section 20B(2)(b)). Subsection (10) provides applicants with a right to appeal to the sheriff against a landlord's decision to make them ineligible for a period for the allocation of housing.</p>	<p>Policy section 10.8 outlines how GWA will apply suspensions, which can range from 6 months to 3 years. Certain suspensions can be reviewed earlier upon request. This complies with Scottish Government Allocations guidance (section 13) which specified that <i>"There is no maximum length for a suspension set out in legislation. However, the Scottish Government's Statutory Guidance makes it clear that statutory suspensions should not exceed three years."</i></p>	<p>Review existing HAP suspension letter to ensure the following information contained:</p> <ul style="list-style-type: none"> • If they have been suspended under section 20B (statutory suspension) • The reason for the suspension in accordance with the HAP • The implications of the suspension (won't be made an offer of housing while it remains in place) • The suspension timescale • Conditions to be met (where appropriate) • Where to find independent housing and/or legal advice • The right to appeal,, including their right to appeal to the Sheriff Court if there are suspended under section 20B 	01/05/19

Housing (Scotland) Act 2001	<p>Part 1: Homelessness and Allocation of Housing, Section 5</p> <p>Subsection (1) enables local authorities to request a registered social landlord (RSL) which holds accommodation in the local authority's area to provide accommodation for an unintentionally homeless person in priority need.</p> <p>Subsection (3) requires registered social landlords to comply with a local authority request, within a reasonable period, unless there is a good reason for not complying.</p>	<p>Policy sections 7.4 and 13.2 outline how GWHA will work in partnership with the Local Authority with respect to Homeless referrals.</p>	<p>None</p>	<p>N/A</p>
	<p>Part 1: Homelessness and Allocation of Housing, Section 9</p> <p>This section substitutes a new version of section 19 of the 1987 Act. Section 19(1) will now extend a right to register on a housing list for accommodation held by local authorities or registered social landlords to anyone aged 16 or over. Section 19(2) defines a housing list.</p>	<p>Policy section 9.1(a) specifies that GWHA's housing register is open to any persons aged 16 or above.</p>	<p>None</p>	<p>N/A</p>
Scottish Social Housing Charter	<p>Outcome 1: Equalities</p> <p>Social landlords perform all aspects of their housing services so that every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.</p>	<p>EQIA Appendix 6</p>		
	<p>Outcome 2: Communication</p> <p>Social landlords manage their businesses so that tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.</p>	<p>Policy section 12.0 outlines how applicants may communicate with GWHA in relation to the HAP.</p>		
	<p>Outcome 3: Participation</p> <p>Social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.</p>	<p>Consultation Report, Appendix 7</p>		
	<p>Outcomes 7, 8 & 9: Housing Options</p> <p>Social landlords work together to ensure that:</p> <ul style="list-style-type: none"> • people looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them • tenants and people on housing lists can review their housing options. <p>Social landlords ensure that:</p> <ul style="list-style-type: none"> • people at risk of losing their homes get advice on preventing homelessness. 	<p>Policy section 2.0 outlines prospects for applicants within GWHA stock.</p> <p>Policy section 12.0 outlines how applicants can engage with GWHA regarding their housing options.</p>		
	<p>Outcome 10: Access to Housing</p> <p>Social landlords ensure that people looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed.</p>	<p>Policy section 6.1 outlines GWHA participation in the development of a common housing register.</p>		

Risk Type		Likelihood (L)		Impact (I)	
S or C	Statutory/Contractual		Score		Score
F	Financial	Unlikely	2	Minor	2
R	Reputational	Possible	3	Moderate	3
TS	Tenant Safety	Likely	4	Major	4
V	Vulnerable Groups	Almost Certain	5	Severe	5

ROBUST GOVERNANCE												
Strategy	Risk	Risk Type	L	I	Inherent Risk	Controls	L	I	Residual Risk	Further Action /Controls	Lead	Review
Corporate Governance	Not allocating properties in compliance with legislation	S, R	4	4	16	Housing Allocations Policy Void Management Strategy Annual Return on the Charter	2	2	4	N/A		
	Non-compliance with Scottish Social Housing Charter	S, R	4	4	16	Housing Allocations Policy Mid-year self-assessment report to MC Annual Return on the Charter Annual Landlord Report	2	2	4	N/A		
Fiscal	Increased rent loss through time taken to relet in absence of policy framework	F, R	5	3	15	Housing Allocations Policy Local Lettings Initiatives Void Management Strategy	2	2	4	N/A		
Asset Management	Inappropriate allocation of property (e.g. overcrowding) leading to e.g. increased wear and tear/demand impact											
Efficiency	Reduced performance in absence of policy/PI framework	F, R	3	3	9	Housing Allocations Policy Local Lettings Initiatives Void Management Strategy	2	2	4	N/A		
ENHANCED SERVICES												
Community Sustainment	Housing needs not properly assessed and/or addressed	S, R, V	3	3	9	Housing Allocations Policy Equalities impact assessment Local Lettings Initiatives	2	2	4	N/A		
	Reduction in tenancy sustainment and impacts to wider community	S, R, V	3	3	9	Housing Allocations Policy Local Lettings Initiatives Community Sustainment Strategy Tenancy Sustainment Database	2	2	4	N/A		

						Welfare Rights Service						
Enterprise & Growth	N/A											

EQUALITIES IMPACT ASSESSMENT									
DIVERSITY	CITY PROFILE ³²	HOUSING APPLICANT PROFILE ³³	SENSITIVITY/ BARRIER	CURRENT MEASURES	ADDITIONAL CONTROLS	FURTHER ACTION REQUIRED	RISK ³⁴	TIMESCALE	LEAD
AGE	16-29 = 24.4% 30-44 = 21.8% 45-59 = 19.1% 60-74 = 11.9% >75 = 6.7%	16-29 = 15% 30-44 = 38% 45-59 = 32% 60-74 = 13% >75 = 2%	Access to accessible/ adapted housing for elderly. Access to housing for larger families with children.	Opportunities to access GWAHA housing via routine access mechanisms ³⁵ Amenity list in operation for >55 as per stock classification/profile. Children can share bedroom up to age 14 (same sex) or age 8 (opposite sex). Cross over with gender.	Policy differentiation between bedrooms and bedspaces to ensure best use of stock. Consideration via January 2018 Housing Needs Analysis (HNA).	Continued close monitoring to ensure representation of all groups via Equalities Monitoring Form (EMF)	L	6-monthly via ARC	TSTL

³² Based on Scottish Government census 2011

³³ Based on GWAHA Housing register (1047 applicants) as of 18/02/2019

³⁴ High/Medium/Low

³⁵ Homeless, Transfer or Housing List

<p style="text-align: center;">DISABILITY</p>	<p>Long term health problem or disability - undefined 22.7% limited health /disabled.</p>	<p>30% of existing main or joint applicants have self-identified as having a disability. This information is not available for all listed in the household.</p>	<p>Inadequate assessment of medical need Cost of acquiring supporting medical evidence.</p>	<p>Opportunities to access GWhA housing via routine access mechanisms Amenity list in operation for >55 as per stock classification/profile. Access to GWhA wheelchair adapted accommodation. Ability to have home medically adapted.</p>	<p>GWhA empowered to seek additional information if required to make assessment of medical need.</p>	<p>Continued close monitoring to ensure representation of all groups via Equalities Monitoring.</p>	<p>M</p>	<p>2019/20 Q2</p>	<p>TSM</p>
<p style="text-align: center;">TRANSGENDER</p>	<p>No reliable source of official info – new statistic expected 2021</p>	<p>0.19%</p>	<p>N/A</p>	<p>Opportunities to access housing list via routine access mechanisms</p>		<p>n/a</p>			
<p style="text-align: center;">MARRIAGE AND CIVIL PARTNERSHIP</p>	<p>Single = 49.2% Married or civil = 31.0% Separated = 3.9% Divorced / dissolved civil partnership = 8.2% Widowed = 7.6%</p>	<p>21% married or in civil partnership</p>	<p>Relationship breakdown</p>	<p>Opportunities to access housing list via routine access mechanisms</p>	<p>Custody arrangements considered under GWhA occupancy standard for accommodation size and points assessment.</p>	<p>N/A</p>			

<p>PREGNANCY AND MATERNITY</p>	<p>No data</p>	<p>No quantitative data recorded</p>	<p>Need to be assessed for correct accommodation size</p>	<p>Unborn child considered part of household when assessing size requirements</p> <p>Overcrowding points can be awarded upon birth of child, where appropriate</p>	<p>None required</p>	<p>N/A</p>			
<p>RACE</p>	<p>White Scottish – 78.6% White –other British 4.1% White – Irish 1.9% White Polish – 1.4% White –other 2.4% Asian, Asian Scottish or Asian British 8.1 Other ethnic groups - 3.5%</p>	<p>49% White 23% BME 28% Prefer not to say or Unspecified</p>	<p>Language barrier in accessing forms, information, access to staff etc.</p> <p>Potential imbalance throughout consultation against community profile.</p>	<p>Policy (S2.3) specifies how to contact office if information required in another format.</p> <p>Routinely provide translators for house visits and office appointments</p>	<p>Links with external organisations and support groups who work with BME groups</p> <p>Consideration via January 2018 HNA</p>	<p>Publish HAP on website to enable use of online translation services for BME applicants</p>	<p>M</p>	<p>2019/20 Q2</p>	<p>TSM</p>
<p>RELIGION OR BELIEF</p>	<p>No religion - 31% Roman Catholic – 27.3% Church of Scotland – 23.1% Other Christian – 4.1% Muslim – 5.4% Other religion – 2.1% Not stated - 7.1%</p>	<p>18% Christian 18% None 10% Islam 0.7% Buddhist 0.7% Hindu 0.6% Sikh 4% Other 58% Prefer not to say or Unspecified</p>	<p>Potential cultural issues e.g. access to running water for bathing</p>	<p>Opportunities to access housing list via routine access mechanisms</p>	<p>None required</p>	<p>Continued close monitoring to ensure representation of all groups via Equalities Monitoring Form (EMF)</p>	<p>L</p>	<p>6-monthly via ARC</p>	<p>TSTL</p>

<p>SEX/ GENDER</p>	<p>Male - 48.2% Female – 51.8%</p>	<p>Male – 42% Female - 48% Prefer not to say or Unspecified - 10%</p>	<p>Single Males and male couples unable to access BWC development Children sharing rooms</p>	<p>Opportunities to access housing list via routine access mechanisms BWC LLI in place Children can share bedroom up to age 14 (same sex) or age 8 (opposite sex). Cross over with age.</p>	<p>BWC LLI subject to <u>bespoke</u> EQIA Flexibility within policy to differentiate between bedrooms and bedspaces to ensure best use of stock.</p>	<p>Continued close monitoring to ensure representation of all groups via Equalities Monitoring Form (EMF) BWC LLI evaluation</p>	<p>L</p>	<p>6-monthly via ARC 2019/20 Q2</p>	<p>TSTL TSM</p>
<p>SEXUAL ORIENTATION</p>	<p>2.2% LGBT</p>	<p>2.5% LGB 47% Heterosexual 2% Asexual 48.5% Prefer not to say or Unspecified</p>		<p>Opportunities to access housing list via routine access mechanisms⁵ BWC LLI in place</p>	<p>BWC LLI subject to own EQIA</p>	<p>Continued close monitoring to ensure representation of call groups via Equalities Monitoring Form (EMF) BWC LLI evaluation</p>	<p>L</p>	<p>6-monthly via ARC 2019/20 Q2</p>	<p>TSTL TSM</p>