



**London Borough  
of Hounslow**

# **Housing Allocation Policy**

**April 2012**

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## **1. INTRODUCTION.**

**Councillor Curran introduction to be drafted.**

## **2. AIMS AND OBJECTIVES.**

This document describes the criteria that the London Borough of Hounslow uses to prioritise applications for housing that the Council lets to our own properties, homes owned by Hounslow Homes (HH) and Registered Providers (formerly Housing Associations) in the Borough where these lettings are made through nomination agreements. These properties are known as Social Housing.

Social Housing is housing owned by Local Authorities and Registered Providers. It may include rented housing owned or managed by other persons and provided under equivalent rental arrangements, as agreed with the Local Authorities or with the Homes and Communities Agency (HCA).

In Hounslow the demand for Social Housing is greater than the number of homes available. There is an extremely limited supply of Social Housing with over 12,000 households on the Housing Register and between 800 and 900 lettings per year. This Allocation Policy describes how the Council prioritises housing applicants to ensure that those with the greatest housing need, as described by the legal definition of 'Reasonable Preference', are given access to available Social Housing.

The Council's Allocation Policy sets out in detail who is, and who is not, eligible to become a member of the Housing Register and how this assessment is made. It sets out how applicants can apply for housing, how they are assessed and what service standards an applicant can expect to receive.

The Council has designed the Allocation Policy to meet all legal requirements and in particular the requirements set out by Section 167 of the Housing Act 1996. It explains the procedures and priorities for the letting of Council and Registered Provider properties in the area. It is the intention of the Policy to support and contribute towards the objectives of the Council's Sustainable Community Strategy by promoting economic growth and sustainable communities.

The key objectives of this Allocation Policy is to:

- Help those applicants most in housing need.
- Provide housing applicants in Hounslow with a fair and transparent system by which they are prioritised for Social Housing.
- Promote the development of sustainable mixed communities and neighbourhoods of choice.
- Encourage residents in housing need who are in low income employment or training.
- Make efficient use of our resources and those of our partner Registered Social Landlords.

This Allocation Policy is supported through the Council's Housing Options approach which informs applicants of their realistic prospects to obtain Social Housing and promotes other housing options e.g. low cost home ownership and Private Sector renting.

The Council are committed to providing a fair and transparent service to all persons eligible for registering for housing under the Council's Allocation Policy.

### **3. LEGAL FRAMEWORK.**

The London Borough of Hounslow's Allocation Policy sits within a tight and complex legal framework.

This section describes this legal framework.

The 1996 Housing Act (as amended by the 2002 Homelessness Act) requires Local Authorities to make all lettings and nominations in accordance with a published Allocation Policy. A summary of the Allocation Policy must be published and made available free of charge to any person who asks for a copy. A summary of the Allocation Policy and general principles is available from Hounslow Civic Centre offices and on the Council's website ([www.hounslow.gov.uk](http://www.hounslow.gov.uk)). The full version of the Allocation Policy can be made available on request at a cost of £10 per copy.

The Housing Act 1996 (as amended), requires Local Authorities to provide 'Reasonable Preference' in their Allocation Policy to people with high levels of assessed housing need. This includes homeless people, those who need to move due to welfare or medical grounds, people living in unsatisfactory housing and those who would face hardship unless they moved to a particular locality within the Local Authority's area.

The Housing Act requires Local Authorities to state within the Policy what its position is on offering applicants a choice of housing accommodation, or offering them the opportunity to express preference about the housing accommodation to be let to them.

This Allocation Policy complies with the requirements of Section 167(2) of the Housing Act 1996 (as amended). In addition, the Council has embraced the changes to allocation legislation brought about by Sections 145-147 of the Localism Act 2011.

This Allocation Policy takes into account the Allocation of Accommodation Code of Guidance for Housing Authorities 2012 which replaced all previous statutory guidance on Social Housing allocations. The Allocation Policy is drafted and framed to ensure that it is compatible with the Council's equality duties including the Equality Act 2010 and has been subject to a full published Equalities Impact Assessment.

#### **4. WHO CAN JOIN THE HOUSING REGISTER – ELIGIBILITY?**

Any eligible United Kingdom Resident aged 16 years or over can apply for accommodation by completing an application for accommodation form online at [www.locata.org.uk](http://www.locata.org.uk) or requesting a form from the Council.

Married, civil partners and cohabiting couples, same sex couples, brothers and sisters who wish to live together can make joint applications. In such cases, it is usual for a joint tenancy to be granted in the event of an offer of accommodation being made.

The Council will only let accommodation to people who are eligible and qualify under this Allocation Policy.

##### **4.1 Applicants who are eligible:-**

- a) UK National, Irish National or EEA National.
- b) Persons granted Exceptional Leave to Remain which is not subject to a condition of non-recourse to public funds.
- c) Persons who have unconditional and unlimited leave to remain in the UK, is habitually resident in the Common Travel Area (UK, Channel Islands, Isle of Man or EIRE) and who is not sponsored.
- d) Persons who have been granted Humanitarian Protection.
- e) Persons recorded by the Secretary of State as a refugee.

Anyone who is not habitually resident in the Common Travel Area, subject to certain exceptions for:-

- a) Persons with rights of residence under European Law.
- b) Persons who are in the UK as a result of being deported/expelled from another country.
- c) Other limited categories of persons who came to the UK fleeing from Montserrat, Lebanon or Zimbabwe.

Anyone who's only right to reside in the UK arises under European law based on their status as a jobseeker or an initial 3 months right of residence.

These rules do not apply to anyone who is already a secure, introductory or assured tenant of accommodation to which they have been nominated by a Local Housing Authority. In that case, you are free to apply for a transfer regardless of your immigration status.

#### **4.2 Applicants who are not eligible:-**

Certain persons subject to immigration control are not eligible for the allocation of the housing under Section 160A(1)(a), (3) and (5) under the Housing Act 1996 (as amended). This includes:-

- Over stayers and visitors to the country.
- Illegal entrants.
- Asylum Seekers.
- People in the country on condition that they have no recourse to public funds.
- Persons from abroad' who fail the habitually residence test.
- Persons from abroad who are in breach of the European Community Right of Residence Directive.
- Persons from abroad' who have been subject of a sponsorship agreement for less than 5 years and who sponsors are still alive.

It should be noted that the statutory framework for eligibility is subject to alteration by the Secretary of State.

#### **4.3 Financial and Asset Restrictions.**

Section 167(2A) of the Housing Act 1996 allows the Council to give less priority to an applicant who has financial resources available to them to meet their own housing needs. This is by having the financial resources available to purchase a property, rent privately or access shared ownership for a period of two years or more.

##### **Capital and/or Assets.**

Owner occupiers who are adequately housed or people with sufficient financial resources available to them to meet their own housing needs will not qualify to register for Housing.

The Council will take into account any previous disposals of assets or capital when calculating the financial resources available which will include disposals for nil (e.g. transfer of ownership) or below market rate value. The Council considers £72,000 total capital and/or assets to be sufficient financial resource to fund their own housing solution.



The primary asset the Council considers is where a person legally owns a property either outright or with the assistance of a mortgage. This includes Shared Ownership as well as having a legal interest in a property even if the person does not live there. Ownership of an interest in a property, whether locally or outside the United Kingdom is a financial resource that will be taken into account when determining an applicant's ability to meet their housing costs.

#### **Income thresholds.**

The Council considers £60,000 per annum household income to be a sufficient financial resource to buy a home or pay market rent in the Borough and therefore such applications will not qualify to register for Housing.

Where an applicant requires more specialised accommodation and owns their own property and has considerable savings or an income of £50,000 the applicant's case will be presented to the Lettings Team Leader to make the final decision as to whether to accept the application.

The Council may wish to make an offer of Social Housing to an applicant that owns their current accommodation, either outright or with a mortgage, if they are no longer able to reside at this property. However, the applicants should not financially benefit from the offer of Social Housing and are therefore required to sell the accommodation as soon as possible after moving into Social Housing.

#### **4.4 Restricted Cases.**

There are some cases where applicants on the Housing Register are either homeless or are owed duties under certain homelessness provisions within the Housing Act 1996 (or Housing Act 1985) but are not entitled by legislation to some of the 'Reasonable Preference' referred to in Section 6.5. This is because they have attained their status by reason of 'restricted persons' being in their household.

These persons are defined in Section 184(7) Housing Act 1996, which relates to immigration law. In cases where this applies, we have decided that the applicant may only have priority for housing assistance under the following categories:

- People who need to move on medical or welfare grounds, including needs relating to a disability.
- People occupying insanitary or overcrowded housing, or otherwise living in unsatisfactory conditions.

#### **4.5 16/17 year olds.**

Any United Kingdom resident aged 16 years or over can apply to go on the Housing Register, although for applicants aged 16 and 17 years old they are not legally able to hold a tenancy so will not be allowed to bid.

However, in certain circumstances a Registered Provider will grant a tenancy to an applicant under the age of 18 years if they are able to provide a guarantor to cover rent and have a support plan to sustain and maintain the tenancy. For young people under the age of 18 years the Registered Provider may grant permission to allow the occupation of a property by way of an 'Equitable Agreement'.

## **5. BANDING SYSTEM.**

Note the Council is consulting on the Banding system and whether to register and Band applicants that have no prospect of receiving an offer of Social Housing. If the latter option is adopted there will be no Band for cases that have no prospect of being housed. In addition the option to adopt a 2 Band system consisting of:

- a) Those cases with exceptional and urgent housing need technically known as 'additional preference' cases. These will normally be placed at the front of the band and may receive a direct and immediate offer in recognition of their urgent housing circumstances.
- b) Those cases that fall into one of the statutory 'Reasonable Preference' head start groups on the basis of their high level of housing need.
- c) Those cases that qualify for under one of Hounslow's local housing need priority groups.

For the purpose of this consultation document the Allocation Policy has been written as a 2 Band system. Consisting of Band 1 (Additional Preference) and Band 2 ('Reasonable Preference' and local priority groups).

### **5.1 The structure of the Priority Banding System.**

When you apply to join the Housing Register you will have your housing need assessed and be given a priority Band if you have sufficient housing priority to be registered. These Bands are the Council's way of making sure we offer homes to people who are most in need. These Bands take into account the people who we need to give preference to by law and those people considered to be a local priority for housing by the Council.

The Policy consists of 2 Bands whose purpose is summarised below:-

### **5.2 Band 1.**

Applicants placed into Band 1 have been assessed as qualifying for 'Reasonable Preference' and have been granted additional preference in recognition of their emergency and extremely urgent need to move. Band 1 cases will be reviewed every 3 months or where appropriate from the date of being awarded to ensure there is still an urgent need to move.

A summary of Band 1 categories and criteria are set out in the table below.

<b>Band 1: Emergency and extreme need to move Band. Granted 'Reasonable Preference' plus additional priority</b>	<b>Summary of Criteria</b>
<p><b>1. Emergency medical or disability.</b></p> <p>All of these awards will be approved by the Chief Housing Officer.</p>	<ul style="list-style-type: none"> <li>• Where an applicant's condition is expected to be terminal within a period of 12 months and rehousing is required to provide a basis for the provision of suitable care.</li> <li>• The condition is life threatening and the applicant's existing accommodation is a major contributory factor.</li> <li>• The applicant's health is so severely affected by the accommodation that it is likely to become life threatening.</li> <li>• The applicant is unable to mobilize adequately in their accommodation and requires rehousing into accommodation suitable for their use.</li> <li>• The applicant's accommodation is directly contributing to the severe deterioration of the applicant's health such as severe chest condition requiring intermittent hospitalization as a result of chronic dampness in the accommodation and the condition of the property cannot be resolved within a reasonable period of time.</li> </ul>
<p><b>2. Exceptional need for an urgent move approved by the Joint Assessment Referral Panel (JARP).</b></p>	<ul style="list-style-type: none"> <li>• Emergency need to move assessed by JARP. The Panel will decide the priority for cases that have multiple needs and welfare of the applicant and/or their household is being adversely affected, and hospital discharge cases where information has been provided by the Independent Living Team and Hospital Social Work Team with a reasonable time frame to accommodate applicants.</li> <li>• All cases that fall outside of the policy will be brought to JARP to consider the priority that should be awarded.</li> </ul>
<p><b>3. Release of adapted property.</b></p>	<ul style="list-style-type: none"> <li>• Where a tenant is willing, and does not require adaptations, to transfer to a suitable non adapted property.</li> </ul>
<p><b>4. Under-occupation.</b></p>	<ul style="list-style-type: none"> <li>• Where a Council tenant will downsize to release 2 bedrooms or more.</li> </ul>

<b>Band 1: Emergency and extreme need to move</b> <b>Band. Granted</b> <b>'Reasonable Preference'</b> <b>plus additional priority</b>	<b>Summary of Criteria</b>
<b>5. Statutory Overcrowded.</b>	<ul style="list-style-type: none"> <li>• Tenants who are statutorily overcrowded [see overcrowding definition in Section 6.6.5.]</li> </ul>
<b>6. Private Sector properties insanitary or unfit.</b>  Those living in insanitary conditions where the conditions pose an ongoing and serious threat to health.	<ul style="list-style-type: none"> <li>• Private Sector tenants and residents of dwellings that the Council's Private Sector Housing Team has determined that the property poses a Category 1 hazard under the Housing Health and Safety Rating System and the Council are satisfied that the problem cannot be resolved by the landlord within 6 months and as a result continuing to occupy the accommodation will pose a considerable risk to the applicant's health. This includes a property that has severe damp, major structural defects including subsidence, flooding, collapse of roof, or have living conditions which are a statutory nuisance <u>and</u> there is no prospect of the problems being remedied within a 6 month time period.</li> <li>• A Private Sector property either owned or rented where a statutory notice (either an Emergency Prohibition Order or a Prohibition Order) has been issued by the Private Sector Housing Team that an unfit property is to be demolished under the Housing Act 2004.</li> </ul>
<b>7. Decant of Council Tenants where demolition is approved.</b>	<ul style="list-style-type: none"> <li>• Where a Council Tenant is required to move because their home will be demolished in the next 6 months.</li> </ul>

### 5.3 Band 2.

Households placed in this Band will have been assessed as having an urgent need to move and as a result have been assessed as qualifying for 'Reasonable Preference'. Band 2 cases will be reviewed at least every 6 months from the date of being awarded to ensure there is still an urgent need to move.

A summary of Band 2 categories and criteria are set out in the table below:

Band 2 Urgent need to move – ‘Reasonable Preference’	Summary of Criteria
<p>1. <b>Homeless Households owed a full homeless duty under Section 193(2) or 195(2) by London Borough of Hounslow.</b></p> <p>‘Reasonable Preference’ Category Section 167(2) (b).</p>	<p>People who are owed a duty under Section 193(2) or 195(2) of the 1996 Housing Act (or under Section 65(2) or 68(2) of the Housing Act 1985) by London Borough of Hounslow</p>
<p>2. <b>Overcrowded by the bedroom standard.</b></p> <p>‘Reasonable Preference’ Category Section 167(2) (c).</p>	<p>Applicants overcrowded according to Section 9 of the Crowding and Space Act 2004.</p>
<p>3. <b>Medical grounds.</b></p> <p>‘Reasonable Preference’ Category Section 167(2)(d).</p>	<p>Where an applicant’s housing is unsuitable for severe medical reasons or due to their disability, but who are not housebound or whose life is not at risk due to their current housing, but whose housing conditions directly contribute to causing serious ill-health.</p>
<p>4. <b>Applicants living in unsatisfactory housing lacking basic facilities.</b></p> <p>‘Reasonable Preference’ Category Section 167(2)(c)</p>	<p>Applicants without access to one or all of the following facilities:-</p> <ul style="list-style-type: none"> <li>• a bathroom or kitchen</li> <li>• an inside WC</li> <li>• hot or cold water supplies, electricity, gas or adequate heating</li> </ul> <p>An applicant who occupies a private property which is in disrepair or is unfit for occupation and is subject to a ‘Suspended Prohibition Order’ and recovery of the premises is required in order to comply with the Order as defined by Section 33 of the Housing Act 2004.</p> <p><i>Applicants who only have access to shared facilities in shared accommodation will not qualify under this criteria.</i></p>

Band 2 Urgent need to move – ‘Reasonable Preference’	Summary of Criteria
<p>5. <b>Hardship/welfare/ exceptional need to move for care or support.</b></p> <p>‘Reasonable Preference’ Category Section 67(2)(c) and (d).</p>	<p>Where a case has been taken to the JARP and has been awarded Band 2 [see definition in Section 6.6.12].</p>
<p>6. <b>Housing need due to age.</b></p> <p>‘Reasonable Preference’ Category Section 167(2) (d).</p>	<p>Decision to be consulted on whether this should relate to age or age and support needs of the applicant?</p>
<p>7. <b>Decant of Council tenant where demolition is approved within 12 months.</b></p>	<p>Where a Council tenant is required to move because their home will be demolished in the next 12 months.</p>
<p>8. <b>Ready to move on from Council Accredited Supported Schemes.</b></p> <p>‘Reasonable Preference’ Category Section 167(2) (c).</p>	<p>The applicant has been assessed as ready to live independently.</p>
<p>9. <b>Move on from Care.</b> London Borough of Hounslow Care Leavers.</p> <p>‘Reasonable Preference’ Category Section 167(2) (c).</p>	<p>The care leaver has been assessed as ready to live independently.</p>
<p>10. Applicants who do not qualify for ‘Reasonable Preference’ but do qualify for Hounslow’s local priority status. These groups will be subject to consultation.</p>	<ul style="list-style-type: none"> <li>• Applicants in the British Armed forces still serving with a discharge date within 6 months will be awarded Band 2.</li> <li>• Applicants who have been discharged in the last 5 years and have previously served in the British Armed forces will be awarded additional preference on the Councils Housing Register to Band 1.</li> <li>• Low income households earning less than £26,000.</li> <li>• Tenancy Training prior to being accommodated.</li> </ul>

Band 2 Urgent need to move – ‘Reasonable Preference’	Summary of Criteria
<p>11. ‘Reasonable Preference’ Category Section 167(2) (a)</p> <p>Homeless applicants found not to be in priority need or are Street Homeless.</p>	<p>Applicants who have been assessed under Homeless Legislation and who are eligible and homeless but is not owed a full statutory duty for rehousing by this Council. This will include households who are owed a statutory duty by another local authority and who have been placed in temporary accommodation within the Borough.</p>

Any applicant that has been assessed and not awarded Band 1 or 2 will not be placed on the Housing Register. These applicants will be provided with housing advice and assistance on alternative housing options available to them.

#### 5.4 Moving up and down Bands.

When an applicant first applies to the Allocation Policy their application will only be accepted once all the required information is received when they will be assessed and placed in a Band with the date of acceptance as their ‘priority’ date. This is the date that will be used for any offers to be made to the applicant.

If the applicant subsequently has a change of circumstances their application will be reassessed and the applicant may:-

- Gain greater priority in accordance with the Policy and be awarded a higher band.
- Lose priority or preference due to their circumstances and enter a lower Band.
- Be assessed as being in the same Band.
- May become ineligible to remain on the Council Housing Register and provided with housing advice and assistance on alternative Housing Options available to them.

Find below examples of how following a re-assessment a change in Banding affects your priority date:-

If an applicant provides information which places them in a higher band following assessment their priority date in the new band will be the date on which they were assessed and accepted for that band e.g. *if an applicant entered Band 2 on the 1<sup>st</sup> January 2012 and then is reassessed and placed in Band 1 on the 1<sup>st</sup> January 2013 their date in Band 1 will be 1<sup>st</sup> January 2013.*

If an applicant provides information which places them in a lower band following assessment their priority date in the new band will be the same as the priority date from the band they were in previously e.g. *if an applicant entered Band 1 on the 1<sup>st</sup> January 2012 and then is reassessed and placed in Band 2 on the 1<sup>st</sup> January 2013 their date in Band 2 will be the 1<sup>st</sup> January 2012.*

## **6. REGISTRATION AND ASSESSMENT PROCESS.**

### **6.1 How you apply to go on the Housing Register.**

Applicants for the Housing Register can be made using a standard form which is available online via Locata.

Applicants are encouraged to complete the online self-assessment followed by the online application form themselves. However, if completed at a Council Office, staff will be available to go through the form or online self-assessment and application form to ensure that the required information is collected.

Staff will provide support in completing the form if requested by telephone and Translation Services will be made available should they also be required.

Applicants who are unable to apply online can at present either apply in person or by telephoning the Lettings Team on 0208 583 4422. You can put your request in writing to The Housing Lettings Team, London Borough of Hounslow, The Civic Centre, Lampton Road, Hounslow, TW3 4DN, or via the Locata CBL website [www.locata.org.uk/Registering](http://www.locata.org.uk/Registering). Having received the application in full, including the required supporting information, then the assessment and awarding of any priority in recognition of the applicant's housing needs will be carried out by staff from the Council.

### **6.2 Who can be considered on the application?**

The Council will assess the size of property you require based on who is included on your application.

Details of all members of your immediate family who normally live with you, or who would live with you if it were possible for them to do so, or other people who have an extenuating need to live with you.

Immediate family includes:-

- You (the main applicant).
- Your spouse or partner. By 'partner' we mean someone you live with as your partner or who you would live with as a couple if they were able



to do so. This includes mixed-gender, same-sex couples, whether or not you are married or in a civil partnership.

- Your child(ren) or your partner's child(ren), if they are aged under 21 and live with you all the time, or for four or more nights every week. You will be required to provide the Council with formal (Court Order) documentation relating to any agreement that is currently in place regarding your child(ren) residency.

Immediate family does not include your, or your partner's, parents, grandparents, brothers, sisters, aunts, uncles, grandchildren, nieces, nephews, cousins, friends, or lodgers unless they have an extenuating need to live with you. Non dependant adults, whether related or unrelated, are generally expected to make their own housing application. You will be required to provide further information and evidence why they need to be considered as part of your household.

If you have adult children, aged 21 or over, or with their own family living at home, they may apply to go on the Housing Register in their own right, but they may wish to contact the Council to consider alternative housing options available to them.

The following household applicants cannot be included in an application:-

- Friends, lodgers, sub-tenants and any other adults not listed above wishing to be included in order to share accommodation with the applicant.
- An applicant who has moved into the current property and caused the household to be overcrowded will be suspended from the Housing Register for a period of 6 months.
- Anyone who does not intend to move to any accommodation offered to the applicant(s) or does not intend to live with them permanently.

### **6.3 People who have an extenuating need to live with you in order to provide or to receive care or support.**

Applicants can include a person on your application if they need to live with you in order to give or receive care or support. This may include a carer, if you require a live in full time carer and live alone, or no one in your immediate household is able to care for you. You will need to explain on your application the reason why the additional person needs to live with you and demonstrate:-

- That they need to be supported or cared for and are dependent on you (this may be for an elderly relative who requires your care or an adult child who is still dependant on you as they are in full time education).
- That other satisfactory arrangements cannot be made.
- That the arrangement is 'permanent'.
- The member of the household will need to be resident in the UK.

A carer is someone who, with or without payment, provides help and support to a partner, relative, friend or neighbour, who would not manage without their

help. This could be due to age, physical or mental health, addiction, or disability. In all cases the carer must have been identified by the applicant as the person who is primarily responsible for providing them with care and the need to live with them or near them.

Even if a carer is in receipt of Carer's Allowance this does not necessarily mean that it is necessary for them to reside with the person who is being cared for. An application to include a carer in a housing application will be considered if the carer has been assessed by Adult Social Care as needing to provide overnight support. In these circumstances the applicant must provide supporting evidence from other agencies e.g. Adult Social Care.

In some limited circumstances it may be possible to consider cases where the carer is not in receipt of Carer's Allowance. Under these circumstances it will still be necessary for the applicant to demonstrate that the person looked after is in receipt of, but not limited to, one of the following benefits:-

- Carers Allowance.
- Disability Living Allowance – paid at either the middle or higher rate for personal care.
- Attendance Allowance.
- Constant attendance Allowance.
- Disablement benefit.

The Council will require you to provide evidence such as that the person requires your support or care; e.g. proof that you and they are providing care and in receipt of care allowances or have a carer assessment. Where it would mean that an extra bedroom will be required for the live in carer, this will be referred to the Lettings Team Leader to make the decision on whether or not to include the carer in your application.

#### **6.4 Family members who are not currently living with you.**

If you are applying to include family members who are living abroad, the Council will register your application but you cannot be re-housed together until the family have been reunited in the UK and can clearly demonstrate that the family member who you wish to add to your application for housing has leave to remain and or, recourse to public funds within the United Kingdom. The Council will not include on your application those family members who are not resident in the UK at the time you submit your application.

In joint access cases bedroom eligibility will be awarded to the main care provider. This means that the child(ren) live with you for more than half the week (four nights or more). It usually means that you are in receipt of child benefit or tax credits and we will take into consideration both parents' housing arrangements to ensure that one property has adequate accommodation for the child(ren). This does not prohibit the other parent from maintaining their usual and agreed access to the children, but they may have to accept an element of overcrowding.

## 6.5 Applicants who do not qualify to register.

### Qualification.

Under the Localism Act 2011 the Council are able to exercise a power to identify 'classes' of persons who are or who are not qualifying persons for the Housing Allocation policy.

The Council has chosen to adopt this power and the following classes of persons do not qualify for the Policy (subject to consultation):-

- An applicant must have been resident in the Borough for 5 years or more.
- Where a household has had previous rent arrears or a history of anti-social behaviour they will have to have demonstrated for 12 months that they have resolved these problems before they can register.
- New applicants will have to make a commitment that they will attend tenancy training before they will receive an offer of accommodation.
- Those with savings or an income above a certain level.
- Those who tried to obtain social housing through fraudulent activity.
- Those that have been found intentionally homeless.

Under the Localism Act 2011 the Council can prescribe by class qualification criteria and non-qualification criteria to be a member of the Housing Allocation Policy.

The following groups do not qualify for the Allocation Policy:

### Qualification length of residency rules.

All lead applicants must have lived in Hounslow for 5 years or more to qualify for the Allocation Policy.

For those residents who are living in Hounslow for 5 years or more but have been placed in temporary accommodation by another local authority in order to meet a homelessness duty they will not qualify.

For those residents who are living in Hounslow but have been placed there by another local authority in order to prevent homelessness they will not qualify until they have been resident for 6 years.

Applicants that have been placed by the Council in temporary accommodation outside of Hounslow under a homelessness duty prior to the enactment of the Localism Act changes to homelessness will qualify. Those cases placed to meet or end a homelessness duty post the enactment of the Localism Act will not qualify.

## **Non qualification due to rehousing and rent arrears/housing related debt.**

This would include current or former rent arrears (including temporary accommodation arrears), damage to a former social housing property or legal costs arising from court action in connection with a current or former tenancy.

This will be assessed at the point when the applicant's priority is being assessed unless new information comes to the Council's attention after their initial assessment.

The following procedure will apply:-

- The Council will consider whether the applicant still owes arrears/debt, and if they do, the extent of the arrears/debt.
- The Council will consider whether there are exceptional circumstances, described below. If there are exceptional circumstances then the applicant may not be subject to reduced priority despite the arrears/debt.
- The Council will consider whether the claimant has taken debt advice acted on it, and entered into and begun to implement any arrangement to clear the arrears.
- The Council will consider whether an arrangement has been made, the amount of arrears paid off, any debt outstanding, and the regularity of any payments made.

After applying the above procedure concerning rent arrears or housing related debt, the Council may decide that a person does not qualify under the Policy until the qualification criteria has been met.

The Council will consider any new application and if the Council is satisfied that appropriate action has been taken by the applicant to address the arrears, the Council will decide if the qualification criteria have been met.

The decision to reduce priority is made immediately after registration. If, having checked, the applicant falls into any of the following arrears categories, the officer should take the appropriate action set out below:

1. Applicants who owe **£100 or over but less than £500** in rent arrears will need to have paid off the arrears in full before they can qualify.
2. Applicants who owe **£500 and above** in rent arrears must either have paid the outstanding amount or reached agreement with their former landlord to pay off the arrears in stages and have made regular payments over a 13 week period. These may be weekly, fortnightly, 4 weekly or monthly payments as agreed but must not be missed.

The only exceptions to the Policy are those who can demonstrate that either they or their family face life threatening circumstances and as a consequence require immediate rehousing, including domestic violence cases.

### **Non qualification due to non-compliance with the tenancy agreement.**

This applies where the Council is satisfied, having considered all available evidence, that an applicant (or a member of their current or prospective household) has failed to adhere to the terms of any current or previous social housing or private rented sector tenancy agreement terms and conditions. This includes failing to maintain any previous social rented or private sector rented property within the terms of their tenancy agreement, or committing acts causing or likely to cause nuisance or annoyance to neighbours or others in the locality of where they live or where they previously have lived. Non-qualification will apply until the applicant (or a member of their prospective household) has demonstrated, to the satisfaction of the Council, that circumstances have changed such that the previous conduct is unlikely to reoccur. In many cases this could include demonstrating cooperation with support agencies leading to a substantial improvement in behaviour.

Any new application will normally only be reconsidered at the request of the applicant and only where there has been no reasonable cause for complaint or concern against the applicant (or members of their prospective household) for a continuous period of twelve months.

### **Intentionally homeless decision.**

Where an applicant has been found by Hounslow or another Council to be intentionally homeless and that award of intentional homelessness they will not be able to qualify for the Housing Register until the actions that the applicant took or failed to take have been addressed to the satisfaction of the Council. This will often be taking action to clear rent arrears or addressing behaviour issues or in the case of applicants who had left settled accommodation with no good reason they will have to have obtained settled accommodation to break the 'chain of causation' which is the intentional homeless decision.

### **Notification of not being able to register for housing.**

An applicant's eligibility to join the Housing Register will be kept under review once they have been registered. An applicant may be rendered ineligible or no longer qualify at any time during the process should the Council become satisfied that they are ineligible or do not meet the qualification criteria. Any applicant classified as being ineligible or does not qualify can make an application for in the future if they can demonstrate they have now met the qualification criteria or in the case of ineligible applicants they are now eligible.

Anyone subsequently made ineligible or who does not meet the qualification criteria will be provided with a full written explanation for the decision and will have a right of review of the decision on the facts of the case.

*'Subject to immigration control and persons from abroad'* - access to housing for foreign nationals is governed by Housing and Immigration legislation.

All can register for housing on the Council's Allocation Policy, but checks are required before they can be considered eligible.

At the point of registration for housing all applicants will be asked for information about their housing history and legal status, including whether they are persons from abroad or subject to immigration control. The Council then carries out checks to establish eligibility to the Policy under the relevant legislation.

Applicants who apply are registered but will be placed into a band accordingly to their priority however this is subject to verification at point of offer of accommodation.

Applicants who apply and have a housing need will be registered and placed in a band according to their need however, every applicant is subject to verification at point of offer of accommodation.

### **Refusal of a reasonable offer of accommodation.**

Applicants who have refused 1 reasonable offer of accommodation whether they have successfully bid for that property or been given a direct offer will no longer qualify for a 12 month period. For applicants where the London Borough of Hounslow have accepted a full homeless duty and a refusal of suitable offer of accommodation the Council will discharge its duty and where appropriate end the Temporary Accommodation placement. Such applicants have a right to a review under S202 of the Housing Act 1996 as amended. After this 12 month period the applicant will be able to reapply for the Housing Register

### **6.6 Assessments of Applications.**

The Council is required by law to determine the priority that housing applicants are awarded. This is particularly important when, as is the case in Hounslow, the demand for Social Housing is greater than the availability of homes.

The law, as it applies to Local Housing Authorities, requires that 'Reasonable Preference' for housing must be given to those in the categories set out in the Housing Act 1996 (as amended). The Statutory 'Reasonable Preference' categories in Section 167(2) (a) to (e) of the Housing Act 1996 (as amended) are:-

- People who are homeless (within the meaning of Part VII of the Act).
- People who are owed a duty by any local Housing Authority under [Section 190\(2\)](#), [193\(2\)](#) or [195\(2\)](#) (or under [Section 65\(2\)](#) or [68\(2\)](#) of the [Housing Act 1985](#)) or who are occupying accommodation secured by any such authority under [Section 192\(3\)](#).
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.

- People who need to move on medical or welfare grounds (including grounds relating to disability).
- People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship to themselves or others.

The Council will use a Banding based system to let accommodation. In assessing housing need the Council will give 'Reasonable Preference' to those applicants who fall into the statutory categories above.

### **Who qualifies for 'Reasonable Preference'?**

The following criteria detail when someone would qualify for 'Reasonable Preference' pursuant to Section 167(2) (a) to (e) Housing Act 1996.

*'Reasonable Preference' Category Section 167(2) (a) - applicants who are homeless within the meaning of Part VII Housing Act 1996.*

This group comprises those cases that have been determined to be homeless and not in priority need and verified applicants sleeping rough. It includes cases that have been found by Hounslow or another local authority to be intentionally homeless. However, these cases will be few as those found to be intentionally homeless will not qualify to be a member of the Council's Allocation Policy unless there are exceptional circumstances.

*'Reasonable Preference' Category Section 167(2) (b) - applicants who are owed a duty by any Housing Authority under Section 190(2), 193(2).*

People who would fall into 'Reasonable Preference' Category (b) are:-

- People who are in priority need and the Council has accepted that it owes the applicant a full duty under Section 195(2) as being threatened with homelessness in the next 28 days, and the Council is taking steps to try and prevent that homelessness from occurring.
- Applicants who have been accepted as being owed the full homeless duty by the London Borough of Hounslow under Section 193(2) of the Housing Act e.g. those who are deemed homeless, in priority need and unintentionally homeless.
- People owed a Section 190(2) duty that have been assessed as being in priority need but are intentionally homeless and have been provided with accommodation for a period of time to enable them to secure their own accommodation. N.B. Priority for this last group is only awarded for the period of time the duty is owed.

### **What is Additional Preference and how is it applied under the Policy**

The Council can grant 'Additional Preference' to applicants under this policy where the Council is satisfied that these applicants have 'Reasonable Preference' and have other exceptional or urgent housing needs. Applicants who are awarded Additional Preference will appear in Band 1 of the policy.

These applicants may be made a direct offer of accommodation in recognition of their very urgent need to move.

There is a very severe shortage of Council and Registered Provider homes in Hounslow. Therefore those households that are assessed as having no prospect of receiving an offer of social housing will not be registered/will be placed in an inactive part of the register (subject to the results of the consultation exercise). **If you are not in urgent housing need**, you are unlikely to ever be offered a Council or Registered Provider home. It is therefore important to consider the housing choices that are open to you, these may include:-

- Privately rented housing.
- Low cost home ownership.
- Reducing your overcrowding by helping some members of your household move to their own accommodation.
- Moving to an area of the country where Council and/or Housing Association properties are more freely available.
- Staying where you are, but getting help to make your property more suitable for your needs.
- A mutual exchange (swapping homes with another social housing tenant).

In recognition of the severe shortage of social housing accommodation available, the Council will only register those households that have been assessed under the Allocation Policy and found to have an assessed level of housing need that is high enough to have some realistic chance of obtaining an offer of social housing even if the likely estimated waiting time is very long.

The award will be made in the following circumstances in Band 1.

#### **6.6.1 Medical or Disability 'Reasonable Preference' cases.**

An applicant who has an urgent need to move, for medical reasons or due to their medical problems or disability which is being exacerbated by their current housing situation, will be awarded 'Reasonable Preference' and Additional Preference and placed in the Band 1. This would include people whose life is at risk due to their current housing conditions or who are completely housebound because of the type of accommodation they live in.

The following are examples of cases that would qualify for Band 1 as they are 'Reasonable Preference' and have been awarded additional priority due to their medical, welfare or disability needs.

- Where an applicants condition is expected to be terminal within a period of 12 months and rehousing is required to provide a basis for the provision of suitable care.
- The condition is life threatening and the applicants existing accommodation is a major contributory factor.



- The applicants health is so severely affected by the accommodation that it is likely to become life threatening.
- The applicant is unable to mobilise adequately in their accommodation and required rehousing into accommodation suitable for their use.
- The applicants accommodation is directly contributing to the deterioration of the applicants health such as severe chest condition requiring intermittent hospitalisation as a result of chronic dampness in the accommodation and the condition of the property cannot be resolved within a reasonable period of time – usually 6 months.
- Where overcrowding in the property leaves the applicant at risk of infection e.g. where an applicant is suffering from AIDS.

Medical or Disability priority is awarded by the Council following an assessment by the Council and/or from the Council's Housing Medical Advisor. An applicant's circumstances will normally only be referred for a medical assessment if an applicant has indicated that there is a serious medical or disability problem that is made substantially worse by their current housing.

Otherwise their circumstances will be assessed by a Lettings Officer using standard guidance. Priority will be given depending on how unsuitable the current accommodation is in relation to their medical or disability needs. The assessment is not purely based on the applicant's health conditions.

#### **6.6.2 Exceptional need for an urgent move approved by the Joint Assessment Referral Panel (JARP).**

The JARP is a Multiagency Panel who assesses professional referrals of cases that fall outside of the Allocation Policy (see Appendix 1).

The Panel will consider:-

- Applicants with medical problems that are not sufficient on their own to confer priority, but where there are other relevant social factors.
- Needing more settled accommodation in order to deal with child protection issues arising under the Children Act.
- The household seeking accommodation has welfare needs so severe that the protection of vulnerable adults or children is only possible if the household were to move to a new home and where the present circumstances could deteriorate to such an extent as to place household members at risk, or in need of residential care unless rehousing is offered.
- Families with a child with behavioural difficulties, which may require an additional bedroom or particular type of accommodation.
- Requiring additional space such as for a carer or to foster.
- The risk level of a potentially vulnerable person continuing to live in his/her current address.
- The need for rehousing due to irreconcilable neighbour difficulties.

- Requests to agree exceptions to established policies e.g. to allow an applicant to qualify despite former or current rent arrears where to adhere to the policy would cause special hardships.
- Requests to agree an applicant for any type of special housing provision, for example, floating support, supported housing because of a learning difficulty, mental health problems, alcohol or drug misuse, sensory difficulties, a need for low-rise or low density accommodation or accommodation in specific areas of the borough to give or receive support etc.
- Requests to transfer following harassment including, verbal abuse, insults, intimidation, damage to property or possessions, threatening or abusive behaviour, racist, homophobic or other abusive graffiti, unprovoked assaults including common assault, actual bodily harm and grievous bodily harm, use of dogs, arson and attempted arson, threatening letters, witnesses of crime, or victims of crime, who would be at risk of intimidation amounting to violence or threats of violence if they remained in their current homes.
- Requests for a transfer or rehousing where there has been a bereavement or personal tragedy in the property or area.

Cases considered by the Panel will be awarded Band 1, Band 2 or no 'Reasonable Preference' or a direct offer of accommodation.

### **6.6.3 Applicants releasing adapted properties.**

Where a tenant is willing to transfer and does not require the adaptations to a suitable non adapted property and is releasing a house or designated older persons property Additional Preference will be awarded.

Where the move has been initiated by the Council and not by the tenant these allocations are by law outside of this Allocation Policy and a direct offer will be made at the Council's discretion.

### **6.6.4 Under Occupation.**

The Council is aware that many of its family homes are currently under occupied and that there are many properties where only one bedroom is used.

Whilst the Council appreciates the rights of a secure tenant it is aware of the needs of families registered on its Allocations Policy that are in need of more suitable housing.

Council tenants who are currently under occupying a family home will be placed in Band 1 if they are releasing a property with at least 2 bedrooms or more. If releasing 1 bedroom they will be placed in Band 2.

Where the move has been initiated by the Council and not by the tenant these allocations are by law outside of this Allocation Policy and a direct offer may be made at the Council's discretion.

### 6.6.5 Statutory Overcrowded.

An applicant who is statutorily overcrowded as defined by the statutory minimum overcrowding standards will be awarded 'Reasonable Preference' and Additional Preference and placed in Band 1.

Those who are Statutory overcrowded as defined by the Housing Act 1985. The Government's minimum standards of space that it considers a family needs to live in.

This is determined by using two separate calculations to determine:-

- How many 'people' are considered to be part of the household.
- How many of those people are expected to sleep in each of the rooms available for this purpose.

The definitions that are set by the legislation for these 2 calculations are as follows:-

#### People:

An adult living in the property	One person
A child aged 10 or over	One person
Children aged between 1 and 10 years	Half a person
Children under 1 year	Not counted/not considered for purpose of room standard

#### Room Occupancy:

Floor Area of Room	Number of persons
110 sq foot or more	2
90 sq foot or more but less than 110 sq foot	1.5
70 sq foot or more but less than 90 sq foot	1
50 sq foot or more but less than 70 sq foot	0.5

As a general rule:-

- 1 room = 2 people.
- 2 rooms = 3 people.
- 3 rooms = 5 people.
- 4 rooms = 7.5 people.
- 5 or more rooms = 2 people per room.

Rooms available for sleeping:-

- All bedrooms and living rooms in the accommodation are taken into account in the calculation, whether or not the household is or wishes to use them for sleeping.
- Open plan kitchen/living rooms are included as sleeping accommodation.
- Bathrooms and kitchens are not included as sleeping accommodation.
- Rooms with a floor area of less than 50 sq foot are not included as sleeping accommodation.

If two people of the opposite sex have to sleep in the same room the accommodation will be overcrowded unless the two people are:-

- A married or cohabiting couple, or
- At least one occupant is under ten years old.

#### **6.6.6 Private Sector Properties insanitary or unfit.**

This is awarded to those applicants who are living in Private Sector properties that are insanitary or unfit conditions where the conditions pose an ongoing and serious threat to health.

Private Sector tenants and residents of dwellings where the Council's Private Sector Housing Team has determined that the property poses a Category 1 hazard under the Housing Health and Safety Rating System and that award has not been granted due to a lack of thermal insulation, and the Council is satisfied that the problem cannot be resolved by the landlord within 6 months and as a result continuing to occupy the accommodation will pose a considerable risk to the applicant's health. This includes a property that has severe damp, major structural defects including subsidence, flooding, collapse of roof, or has living conditions which are a statutory nuisance, *and* there is no prospect of the problems being remedied within a 6 month time period.

A Private Sector property either owned or rented where a statutory notice has been issued by the Private Sector Housing Team that an unfit property is to be demolished under the Housing Act 2004 will be awarded 'Reasonable Preference'.

For Council or Social Housing properties deemed to be insanitary or unfit the matter will normally be resolved by an offer of a decant move to a suitable alternative property while the work is carried out. Where the case is assessed

as a non-priority transfer, or the Council initiate the transfer due to the housing conditions, any transfer to another tenancy on a like for like basis can be made, and such an offer will be outside of this Allocation Policy as a result of the changes brought about by the Localism Act.

#### **6.6.7 Decant of Council Tenants where demolition is approved within 6 months.**

Where a Council Tenant is required to move because their home will be demolished in the next 6 months, Band 1 will be awarded and if a property is imminently required (within 6 months) because of a lease expiry or for major works and the tenant will not be returning (e.g. development schemes).

If the need to move is not imminent (within 12 months) the applicant will be placed into Band 2. Applicants are expected to bid actively within the specified time period (usually between 6 and 12 months).

This may be necessary if the freehold of the property belongs to another landlord, the lease is due to end and the Council is obliged to return the property with vacant possession. Priority is awarded for the period of time during which applicants will be expected to bid. If they fail to bid or bid inappropriately or unreasonable refuse properties, priority may be withdrawn and or a direct offer, 'one offer only' will be made.

#### **The application of 'Reasonable Preference'.**

The London Borough of Hounslow is required by law to determine the relative priority that housing applicants are awarded. This is particularly important when, as is the case in Hounslow, the demand for social housing is greater than the availability of homes.

The law, as it applies to local housing authorities, requires that 'Reasonable Preference' for housing must be given to those in the categories set out in the Housing Act 1996 (as amended).

The statutory 'Reasonable Preference' Categories cover:-

- All homeless people as defined in Part VII of the Housing Act 1996 (whether or not the applicant is owed a statutory homeless duty and regardless of whether such cases have any local connection with Hounslow Council);
- People who are owed a duty under Section 190 (2), 193 (2) or 195 (2) of the 1996 Act (or under Section 65 (2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any Housing authority under Section (192 (3)).
- People occupying insanitary, overcrowded or otherwise unsatisfactory housing;
- People who need to move on medical or welfare grounds (including grounds relating to a disability);

- People who need to move to a particular locality within the district to avoid hardship to themselves or others.

As well as the groups the Government says must be given a head start the Council has decided to give priority to some categories of applicants who are employed on a low income (*Subject to the results of the consultation exercise*).

The award will be made in the following circumstances in Band 2

#### **6.6.8 Homeless households owed a full homeless duty.**

The Council will award Band 2 priority for households where the London Borough of Hounslow has accepted a full homeless duty to the applicant.

#### **Note:**

The Localism Act grants the power to end any homelessness duty under Sections 193 and 195 with a Private Rented Sector offer of a 12 month fixed term tenancy. As a result from enactment of the Localism Act this 'Reasonable Preference' award for being accepted as being owed a full homelessness duty will only be applied whilst the duty is owed. Once it is ended with a Private Rented Sector offer an applicant will no longer receive a 'Reasonable Preference' priority for being homeless.

#### **6.6.9 Overcrowded by the bedroom standard.**

Those overcrowded by 2 bedrooms in line with the bedroom standard will be granted 'Reasonable Preference' and will be placed in Band 2.

The bedroom standard is set out in the Housing (Overcrowding) Bill in the following way; for the purposes of the bedroom standard a separate bedroom shall be let to the following persons:-

- A person living together with another as husband and wife (whether that other person is of the same sex or opposite sex).
- Persons over the age of 21 will be disregarded in the calculation of overcrowding two persons of the same sex aged 10 years to 20 years.
- Two persons (whether of the same sex or not) aged less than 10 years.
- Two persons of the same sex where one person is aged between 10 years and 20 years and the other is aged less than 10 years.
- Any person aged under 21 years in any case where he/she cannot be paired with another occupier of the dwelling so as to fall within the above categories.

The Housing (Overcrowding) Bill (Bill 46) was not passed by Government, however it is cited as good practice nationally and therefore this will be the standard by which the Council will measure overcrowding levels for the purpose of awarding 'Reasonable Preference'.

Applicants who claim they are overcrowded will have their circumstances assessed against the Bedroom Standard.

#### **6.6.10 Medical Grounds.**

'Reasonable Preference' will be awarded where an applicant's housing is unsuitable for severe medical reasons or due to their disability, but who are not housebound or whose life is not at risk due to their current housing. However their housing conditions directly contribute to causing serious ill-health. If this is the case they will be awarded 'Reasonable Preference' and placed into Band 2. Their circumstances will be assessed by a Lettings Officer using set criteria, and may need to be referred to a Qualified Nurse/Councils Housing Medical Advisor or Occupational Therapy Team depending upon the circumstances.

The following are examples of cases that would qualify for Band 2 status under one of the statutory 'Reasonable Preference' Categories e.g. medical, welfare or disability needs evidence will be required to substantiate your requirements:-

- The applicant's accommodation is directly contributing to the deterioration of the applicant's health such as severe chest condition requiring intermittent hospitalisation as a result of chronic dampness in the accommodation.
- Children with severe conditions such as autism, or cerebral palsy where their long term needs cannot be met without settled accommodation.
- A member of the household seeking accommodation is disabled and re-housing will enable that person to overcome physical barriers created by current accommodation e.g. steps and stairs.
- A person with a severe disability requiring substantial adaptations to a property which is not provided for in their current accommodation.
- A person with a terminal illness or long term debilitating condition whose current accommodation is not having a significant impact on their condition but where their quality of life would be significantly improved by moving to alternative settled accommodation which may or may not be closer to support.
- A person suffering with mental illness or disorder where the medical condition would be significantly improved by a move to alternative accommodation.

### **6.6.11 Applicants living in unsatisfactory housing lacking basic facilities.**

Unsatisfactory housing conditions: Applicants will be placed in Band 2 due to unsatisfactory housing conditions if they;

- Lack a bathroom or kitchen.
- Lack an inside WC.
- Lack hot or cold water supplies, electricity, gas or adequate heating.
- Occupy a property which is in disrepair or is unfit for occupation.

### **6.6.12 Hardship/Welfare/Exceptional need to move for care or support.**

Those applicants that qualify for 'Reasonable Preference' on welfare grounds will be those urgent cases that require care and support needs or have other social needs that do not require medical care or support. In Hounslow there are two groups that will be awarded 'Reasonable Preference' for welfare needs. These are listed and detailed below.

#### **1. Priority award under the Exceptional circumstances, Welfare and Hardship criteria.**

With the exception of elderly infirm applicants and those leaving care or who are ready to move on from specific supported housing schemes that need a stable base from which to build a secure life the award of 'Reasonable Preference' priority on welfare grounds.

#### **2. Applicants who need to move due to domestic abuse, extreme violence or extreme harassment.**

People who have satisfied the Council that they are immediately fleeing severe harassment or violence from inside or outside of the home but have chosen not to make a statutory homelessness application but to remain with relatives and friends on a short term basis. Such cases can be awarded Band 2 status.

However, Council Tenants and applicants that have been referred by West London Domestic Violence Protocol will be offered a like for like transfer; for those applicants that have been referred via out West London Partners, Hounslow will require a property of the same standing in which Hounslow Council have rehoused the applicant into. For existing Council Tenants, dependent on the severity of circumstances they may be offered a like for like transfer (and since the Localism Act such transfers sit outside of this Allocation Policy) or in some cases be referred to our West London Domestic Violence Protocol where merits warrant'.

- *'Reasonable Preference' Category Section 167 (2) (e) – People who need to move to a particular locality within the Local Authority's district, where failure to meet that need would cause hardship to themselves or to others will be granted Band 1 or 2 priority depending on the severity of the impact of their housing on their condition. Details of when*



*'Reasonable Preference' will be granted for this group and what Band will be relevant are given below.*

This category applies to those who need to move to a particular area within the Hounslow Council boundary, where failure to meet that need would cause hardship to themselves or others. Given that the Borough is geographically compact, with good transport links, an award will only be made in very exceptional circumstances. 'Reasonable Preference' would not normally be awarded to applicants who claim that they require ongoing support from relatives or friends, unless there is severe mental health, medical or welfare issues relating to this person or a member of this person's household and exceptional reasons why this support cannot be made available through a reliance on public transport or the applicant's own transport.

### **Examples when Band 2 'Reasonable Preference' might be awarded on hardship grounds.**

#### **Need to move on hardship grounds – support or employment.**

- Those who need to move to give or receive care that is substantial and ongoing.

Those who need to access social services facilities, and are unable to travel across the Borough to take up (or continue) employment, education or a training opportunity that is not available elsewhere and who does not live within reasonable commuting distance.

#### **6.6.13 Housing need due to age.**

Applicants will have their welfare need recognised and 'Reasonable Preference' awarded should their current housing be inadequate. As assessment of an applicants needs to move due to infirmity caused by old age will be made by the Council taking into account information provided by one or more of the following:

- An applicant's GP or consultant.
- Social Services.
- Occupational Therapist.
- Age Concern or any other voluntary sector organisation representing the applicant.
- Council Housing Medical Advisor.

#### **6.6.14 Decant of Council Tenants where demolition is approved within 12 months.**

If an applicants need to move is not imminent e.g. within 12 months the applicant will be placed into Band 2. Applicants are expected to bid actively within a specified time period usually between 6 and 12 months. This may be necessary if the freehold of the property belongs to another landlord, the lease is due to end and the Council is obligated to return the property with

vacant possession. Priority is awarded for the period of time during which applicants will be expected to bid. If they fail to bid or bid inappropriately or unreasonable refuse properties for which they have bid, priority may be withdrawn or a direct offer "one offer only" allocation may be made.

#### **6.6.15 Ready to move on from Council Accredited Supported Schemes.**

Applicants will be awarded this priority for certain listed projects in accordance with protocols agreed between the Council and the voluntary sector body. Not all applicants who occupy named supported housing projects will qualify for 'Reasonable Preference'. They must have vulnerability and urgent housing need that is best met by the provision of long term settled housing. All other cases will not be owed 'Reasonable Preference' under this category and will be expected to be assisted by the project with support from the Housing options service to move on to Private Rented Sector accommodation. The criteria for an award of 'Reasonable Preference' will be:-

- An applicant is ready to move to independent settled housing.
- The applicant is in need of medium to long term rather than short term ongoing tenancy support.
- That support package has been assessed and is in place.
- An applicant's vulnerability is such that accommodation in the private rented sector would through its short term have a detrimental effect on their vulnerability.

#### **6.6.16 Move on from Care.**

Applicants are awarded this category in accordance with protocols between Hounslow Council's Housing and Children Services Departments. Applicants must be a former "Relevant Child" as defined by the Children Leaving Care Act 2002. As with the need to move on from supported accommodation not all care leavers will qualify for 'Reasonable Preference'. They must have vulnerability and urgent housing need that is best met by the provision of long term settled housing. All other cases will not be owed 'Reasonable Preference' under this category and will be expected to be assisted by the Children's Services with support from the Housing options service to move on to private rented sector accommodation. The criteria for an award of 'Reasonable Preference' will be:

- A care leaver is ready to move to independent settled housing and is genuinely prepared for a move to independent living.
- They possess the life skills to manage a tenancy including managing a rent account.
- The care leaver is in need of either a long term or medium term tenancy support.
- That support package has been assessed and is in place.
- Their needs are such that accommodation in the private rented sector would through its short term nature have a detrimental effect on their transition to independent living.

### **6.6.17 Applicants who qualify for the London Borough of Hounslow's Local Priority Status.**

#### **British Armed Forces.**

Applicants who have served in the British Armed forces and have been served with discharge date within a period of 6 months will be awarded Band 2.

Applicants who have been discharged in the last 5 years and have previously served in the British Armed forces will be awarded additional preference on the Councils Housing Register be awarded Band 1.

#### **Low-income working households**

This policy aims to support the economic growth of Hounslow.

The Council want to encourage people who can, to work and want to raise levels of aspiration and ambition. We will offer increased priority to applicants who are working but are on a low income and will therefore find difficulty in accessing outright Home Ownership or Low cost low Ownership.

#### **Definition of low income working households.**

Household where are least one adult household member is in employment and their income is lower than £26,000. For the purposes of this Allocation Policy employment is described as having a permanent contract or working as a temporary member of staff or being self-employed. Applicants will only qualify if the worker has been employed for 9 out of the last 12 months. Verification will be sought at point of application as well as point of offer under the same terms. Applicants must provide paylips, P60, bank statements or a verifying letter on headed paper in order to qualify. Applicants will only be eligible for the Working Households Award of increased priority if the applicant has a current positive residence history.

#### **Tenancy Training prior to being accommodated.**

It is a requirement of the qualification rules that an applicant and any partner included on the application form attend training on preparing to be a tenant before an offer of accommodation will be made. Applicants who are assessed as falling within a statutory or local priority category will be provided with details of training events and dates and will be expected to enrol and complete a training course.

### **6.6.18 Homeless applicants found not to be in priority need or are street homeless.**

The Council will award priority to households where another Local Authority has accepted a homeless duty or where a person is not owed a full homeless duty by London Borough of Hounslow

### **6.7 How the Council determines the size and type of property for which applicants are eligible.**

In order to make the best use of the available housing stock, it is essential to let vacancies to those who need that size and type of property. Examples include houses with two or more bedrooms to be let to families with young children, Sheltered housing to be let to older people and properties that have been built or adapted for a person with a physical or sensory disability.

When deciding the size and type of property for which applicants are eligible, the Governments Bedroom Standard will normally be used. A definition of this is outlined in Section 6.5.5.

In exceptional circumstances the Council, delegated as appropriate, may exercise discretion in deviating from the Bedroom Standard. Examples are:

- For those applicants who are separated or divorced and sometimes care for their children, the Council officer will consider how often and for how long the children stay with them. If appropriate, that officer may exercise discretion and award additional bedrooms for the children in accordance with national guidance.
- Where applicants require larger accommodation on health grounds. This will be considered on a case by case basis, taking into account the advice of a qualified medical advisor.
- Where the applicant has been approved as a foster carer by Children's Services, and so will need a larger property than normally required by the household as awarded by the JARP.
- Where the applicant or a member of the household needs the support of a carer who will need to sleep in the home and cannot reasonably be expected to share a bedroom with another member of the household. See paragraph below for more information about including a carer in a housing application.

#### **Type of accommodation.**

The Council has designated housing schemes for the elderly. These units will be offered via the choice-based Lettings scheme to eligible members.

The Council has two different types of accommodation, which are specifically for the elderly:

## **Older Persons Dwellings (OPD).**

These units are designated for older homeseekers and transfers, aged 50+ who can live independently. When advertised, the units will always state an age criteria and in order to be eligible for the property, the criteria will need to be met with no exception. The properties are generally in low-rise blocks and are 1-bed or bed-sit units with self-contained facilities. Some units have adapted bathroom facilities and in some cases there may be scope to adapt units further. Some units will require prospective tenants to have good mobility as many units are in low-rise blocks, on the first or second floor without lift access.

Flats and bed-sits within an Older Persons Dwelling are designated for members, who must be 50+ in age.

1-bed and bed-sit bungalows are designated for homeseekers and transfers who must be 55+ in age.

Where a couple is to be offered a unit in an Older Persons Dwelling, one partner must meet the set age criteria. If the remaining partner falls below the age criteria, a decision will need to be made as to their eligibility for the property by the Lettings Team Leader.

## **Sheltered Housing.**

Sheltered accommodation is designated for applicants aged 60 years or over. The units are generally located within a secure compound and are managed by a Sheltered Scheme Manager.

To be eligible for Sheltered housing Applicants must be:-

- Aged 60+ or over or.
- Be eligible for housing as per the published Allocations Policy of Hounslow Council and appear in the appropriate Band within the Allocations Policy.
- Be assessed for support that is provided by the Scheme Manager during working hours where appropriate. Applicants must be deemed suitable for the scheme and confirm they do not have support needs that are unable to be met or would be detrimental to the Scheme itself or other tenants.
- Be made aware of the costs of moving into the Scheme before a letting is carried out. This is especially in regard to Supporting People costs where these are not covered by Housing Benefit.

Where a couple is to be offered a unit in a Sheltered Housing Scheme, one partner must meet the set age criteria. If the remaining partner falls below the age criteria, a decision will need to be made as to their eligibility for the property by the Lettings Team Leader.

Therefore quota labelling will be applied to vacancies advertised through Choice Based Lettings. It is a condition of all tenancies in Sheltered Housing schemes that tenants agree to take the Link Line and Warden Service.

### **Extra Care.**

The purpose of Extra Care Housing is to provide older people with their own home and tenancy within a support and care environment ensuring that appropriate personal and housing support are available as required. All applicants will be registered and assessed for rehousing in line with Hounslow Council's Allocations Policy and be eligible to access Local Authority Housing.

A medical assessment will be requested as per Hounslow Council's policy and procedures for housing applicants where an applicant says they have a medical need.

To be eligible for the scheme all potential tenants must:-

- Be over 60 years of age.
- Be eligible for housing as per the published Allocations Policy of Hounslow Council and appear in the appropriate Band within the Allocations Policy.
- Be prepared to agree to the scheme requirements and consider use of the care provider to meet any care needs either at the letting or if needed in the future.
- Be made aware of the costs of moving into the scheme before a letting is carried out. This is especially in regard to Supporting People costs where these will not be covered by Housing Benefit.

Extra Care will be approved by the Lettings Team Leader for the Council who will require an up to date social care assessment in an appropriate format outlining the prospective tenants housing and social care needs and a medical/social history to enable he or she to arrive at an informed decision as regards whether their needs can be met within the scheme.

A potential tenant must meet all scheme criteria. These allocations will be made directly and will formally be made by the re-housing team following a pre offer interview with the Scheme Manager.

### **6.8 Review of Applications (re-registration).**

It is the intention of the Council to review all cases on the Allocation Policy annually and this may be extended to review cases more frequently. Failure to respond to correspondence in relation to the review will result in the applicant being deleted from the Housing Register. Applicants who are deleted will be notified in writing. If good reason can be shown why there was a failure to respond to the review within 6 months of the application being closed then the application may be reinstated.

## **6.9 How changes in circumstances are dealt with.**

All applicants are required to notify the Council immediately of any change to their circumstances which may affect their priority for housing. Applicants who have had a change of circumstances and have not informed the Council, but it comes to the Council's attention, may have their application status changed to 'application is pending' whilst an investigation takes place in order to determine eligibility.

Applicants should notify the Council of any change in their circumstances by completing the online change in circumstances form or by telephoning the Lettings Team.

This will include for example:-

- A change of address, for themselves or any other person on their application.
- Any additions to the family or any other person they would wish to join the application (Please note it is for the Council to decide whether they will allow a person/s to join the application).
- Any member of the family or any other person on the application who has left the accommodation.
- Any change in income, assets or savings.

## **7. HOW PROPERTIES ARE LET UNDER THE POLICY.**

### **7.1 What are lettings under the Policy?**

The following are 'lettings' of accommodation under this Policy:

- The selection of a person to be a secure or **introductory** tenant of the Council (including notifying an existing tenant or licensee that his tenancy or licence is to be a secure tenancy). This includes; the granting of a new tenancy to an existing tenant by way of "transfer" upon the tenants request/the granting of a new tenancy under the Council's (non statutory) contractual and/or discretionary succession policy, or
- The nomination of a person to be an Assured or an Assured Shorthold tenant of housing accommodation held by a Registered Provider via the Council's Nomination Rights Agreement with the Registered Provider Often the nomination will be that of a 'Starter Tenant' of a Registered Provider whereby the Registered Provider will grant an Assured Short Hold Tenancy for a set "probationary" period (usually 12 months) and provided the tenant successfully completes the "probationary" period the Registered Provider will grant an Assured Tenancy.

## **7.2 Lettings not covered by the Policy.**

The following are not 'lettings' under this Policy:

- An offer of accommodation to a non-priority tenant of Hounslow Homes. Under the Localism Act 2011 such cases are no longer subject to the Allocation rules set by section 167 of the Housing act 1996 Part 6.
- Succession to a tenancy on a tenant's death pursuant to S89 Housing Act 1985, or;
- Assignment of a tenancy by way of mutual exchange, or;
- Assignment of a tenancy to a person qualified to succeed to the tenancy on the tenants death, or;
- Transfer of the tenancy by a Court Order under family law provisions or under the Civil Partnership Act 2004, or;
- An introductory tenancy becoming a secure tenancy.
- Council initiated transfers (e.g. decant to alternative accommodation to allow for major works).
- Re-housing due to being displaced from previous accommodation by the Council or being re-housed by the Council pursuant to the Land Compensation Act 1973.
- A person being granted a family intervention tenancy.
- Provision of non secure temporary accommodation in discharge of any homelessness duty or power.
- Lettings which Registered Providers (RP) make outside of nominations agreements.
- Allocations to an individual where there may be public protection risks.
- Offers of tied accommodation made to Council employees.
- Urgent management transfer cases that have been approved by the JARP panel.
- Contractual duty owed by the Council (Ex-service tenants) - where stipulated in employment contracts by London Borough of Hounslow.
- For cases where the Council has a contractual duty to provide accommodation. This only applies where caretakers/sheltered scheme managers has been provided with accommodation as part of employment and the contract of employment guarantees on going accommodation.

## **7.3 Choice and Constraints.**

### **Choice and expressing preferences regarding the area in which an applicant wishes to live in.**

The amount of choice that the Council is able to offer is limited by the acute housing pressures it faces and responsibilities it has to some groups in housing need. The Council believes that any applicant considered to be eligible under this Policy should be able to express a preference over the type of property and the area in which they would like to live. However applicants should be aware that the Council's ability to satisfy their expressed preference may be severely limited.



The Council operates a Choice Based Lettings system called Locata. This means that an applicant can express an interest in any homes that they are eligible to bid for. The majority of applicants will be able to bid for properties in any location across the Borough. There are some circumstances for which this might not always apply and a direct offer will be made for example, due to the scarcity of some property types.

The Council requests that the applicant states those areas where they believe they cannot live due to fear of violence, harassment or domestic abuse. The Council must be satisfied such factors exist and that it is reasonably necessary to let accordingly.

The Council will allow one reasonable offer of accommodation to be made either through Choice Based Lettings or a direct offer. If refused the applicant will cease to qualify for the Allocation Policy for a 12 month period.

#### **7.4 Quota's and how they are applied.**

In general properties will no longer be routinely advertised as ring-fenced to particular groups.

The Council may apply quota labelling in order to identify suitable applicants in the following particular circumstances:-

1. To ensure that overall the Allocation Policy meets the needs of those owed a statutory 'Reasonable Preference'.
2. Where there are local lettings policies for particular estates, blocks, or roads.
3. Where remedial action is needed to ensure that the estimates of lettings to each group set out in the annual lettings quota's are achieved. (This will only be where the Council decides to set the lettings plan by particular groups). This may mean that at times quota labelling will need to be applied. Where a property is advertised with quota labelling, the letting will be made to the bidder with the earliest priority date in the highest Band that meets the criteria set by the quota labelling.
4. Where possible, preference for a house with a private garden will be given to families with children under the age of 10.

#### **7.5 Making bids and allocating properties.**

The Council lets the vast majority of its homes and its nominations through its Choice Based Letting Scheme. For all advertised properties, the eligibility of bids received will be checked against the labelling used in the advertisement. Any ineligible bids will be discarded. Where properties are advertised the allocation of a property will be based on the priority of bids received, with Band 1 applicants having the highest priority unless a property is restricted to another band.

If more than one bid is received from applicants with the same priority Band or sub Band, then the person who has been registered longest will be offered the property. If two or more applicants have the same priority and registration date, the applicant with the earliest bidding date within the cycle will be awarded the property.

## **7.6 Information Requests.**

An applicant will, on request, be shown and given a copy of his/her entry on the Allocations Policy. The Council will on request from the applicant, provide such information that is practicable and reasonable to supply, to explain their position and priority on the Allocations Policy in relation to when an offer of suitable accommodation might be made. An applicant has the right to be informed of any decision about the facts of their case which is likely to be taken into account when considering whether to let housing to them. Applicants maybe charged a fee of £10.00 for this information.

Applicants are encouraged to bid for properties over a wide area of choice and to consider properties in the private rented sector if they require a specific area where demand is high.

## **7.7 Chief Housing Officer's discretion.**

As far as is it possible the Council will use the Banding system and waiting time within the Band to let accommodation. At times this will incorporate quotas of properties through Choice Based Lettings and Local Lettings Plans to ensure that the Council is meeting its statutory obligations and helping to achieve the outcomes of the Councils Sustainable Community Strategy.

However the Council recognises that there may be exceptional circumstances where the only way an exceptionally urgent housing need can be resolved is through the use of management discretion. In the interests of fairness to all these applicants these circumstances are to be kept to a minimum. Examples of exceptional circumstances include, but are not limited to:-

- Threat to life.
- Emergency cases whose homes are damaged by fire, flood or other disaster may be provided with another tenancy if it is not possible to repair the existing home, or if any work to repair is to take such a long period of time that there will be serious disruption to family life.
- Households who, on police advice, must be moved immediately due to serious threats to a one or more members of the household, or whose continuing occupation would pose a threat to the community, including the National Witness Mobility Scheme or Safe and Secure.
- An applicant who has an exceptional need that is not covered in the Allocations Policy. For example, where child or public protection issues require rehousing or for severe domestic abuse where all other options to remain in the home have been considered.
- Other exceptional circumstances as authorised by the Chief Housing Officer.

- Cases would go to JARP to award direct offers or higher banding in certain circumstances

Such cases will qualify for 'Reasonable Preference' and will be granted additional preference and placed at the top of Band 1, irrespective of waiting time and may be made a direct offer of accommodation. A list of all applicants given Band 1 priority, and a subsequent list, under management discretion will be kept, monitored and reported on annually for the purposes of monitoring this policy.

### **7.8 Lettings to staff, Board Members of relevant organisations, Council Members and relatives of these groups.**

This Policy is designed to ensure that Hounslow Council is transparent and equitable when letting homes to staff, Council Members, or Registered Provider Board Members and their relatives.

Staff, Registered Provider Board Members, Council Members and their relatives are treated as any other applicant and must be seen to not be gaining any advantage or disadvantage or any preferential treatment in the course of their application.

Therefore, the following procedure must be undertaken to ensure that any letting can be subject to a high level of scrutiny:-

- The applicant who is applying for housing or their relative must have no direct input into any decisions regarding their rehousing. This includes not inputting the original application onto the Register system or adding any priority at any time onto the application.
- Staff members must not have any involvement in the inputting of the application or awarding of priority for any relative.
- Applications should be clearly marked on the housing management system that the application is that of a staff member, Board Member, Council Members, or relative. The Lettings Team leader will keep a record of all applications made by members of staff, Board Members and Council members. As this information will only be accessible for the Housing Management Team.
- When such an applicant has bid for a property and is showing at the top of a priority, or a direct offer is to be made, a 'record of interest' note must be completed and signed off before any offer of a property is made. The details of the offer must be scrutinised and detailed on the form and signed off by the Lettings Team Leader or Head of Housing Options & Solutions.
- Attached to the form must be copies of the computer screens of all the appropriate information from the housing management system including the Choice Based Lettings advert and dates it was advertised, the shortlist from which the applicant is being offered from, together with the policy evidence for any applicants above them being not made the offer.

## **7.9 Local Lettings Policy (LLP).**

The Council will in partnership with Hounslow Homes and Registered Providers deploy local letting policies to ensure good tenancy management.

- LLP's may be developed to meet the particular needs of a local area.
- LLP's must be evidence-based and there must be a clear need (this may take the form of recurring antisocial behaviour issues, high child densities or a concentration of older residents – see examples provided below.
- LLP's must be developed and approved in accordance with an agreed procedure that must have specific aims and will be reviewed on an annual basis.

The decision to implement any LLP will be approved by the Chief Housing Officer and in the case of a Registered Provider's property in conjunction with a Senior Manager of the relevant Housing provider for whom the Council has nomination rights for properties held by that Registered Social Landlord. Any decision to implement a LLP will always take into account the implications for equal opportunities and the need to ensure that the Council is able to meet the allocation needs of those owed a 'Reasonable Preference'.

Where a property is advertised in accordance with the LLP, the letting will be made to the bidder with the earliest priority date in that group who meets the eligibility criteria of the LLP and meets the entitlement rules around size eligibility.

### **Examples of possible LLP's:-**

The following are examples of LLP's that could be employed in Hounslow covering an area, estate, or block:-

- Age restrictions;
- Transfer applicants with a positive tenancy history in respect of no rent arrears and exemplary behaviour;
- Lettings to employed persons where there is a high concentration of existing residents who are out of work;
- Restrictions on lettings to vulnerable households where there are already a concentration of supported tenants/residents.

LLP's will be subject to a review at least every 12 months, or as and when changes to an estate, area or block, necessitate such a review.

## **7.10 How low demand properties are dealt with under the Policy.**

On very rare occasions properties will be advertised through Choice Based Lettings and there will not be any applicants or all applicants have refused the property. The Council will use their discretion to decide if a property should be re-advertised or if a direct offer should be made.

## **7.11 How medical assessment and adapted homes are dealt with under the Policy.**

### **Assessments.**

Following the registration and initial assessment of a housing application, a decision will be made on whether any follow-up action is appropriate, for example, referral to the Council Housing Medical Advisor, Housing Occupational Therapist, and Private Sector Housing team or to the Homelessness Prevention/ Assessment Team if there is a threat of homelessness.

### **Medical Needs.**

Members (homeseekers or tenants) who indicate that they have an illness or disability, which is affected by their current home, or who may be vulnerable on physical or mental health grounds and in need of settled accommodation:

1. Are required to complete a Medical Self-Assessment Form. This is available from the Lettings Team. The completed form, together with supporting evidence from their General Practitioner, hospital consultant or Occupational Therapist, as appropriate, is considered by the Lettings Management Team, the Prevention and Advice Team and for tenants by the Estate Manager. Applicants are not to approach their GP's/Consultants to provide medical reports. The Council Housing Medical Advisor may request this directly, should this additional information be necessary. The Lettings Team/Estate Management will assess the medical self-assessment form and only where appropriate, may seek further advice from the Council's Housing Medical Advisor. If they feel the information on the form does not warrant any further priority, the form will not be forwarded to the Council Housing Medical Advisor.
2. Assessments are made of the effect of the present housing on the state of health of the members or any person included on the housing application. Medical priority may be awarded according to the extent to which the health of the applicant or person included on their housing application is affected by their current accommodation and the expected benefits of providing suitable alternative settled accommodation. Where applicants describe issues of disrepair as causing or affecting health, the Council will take steps to investigate and enforce action to resolve issues of disrepair. If, after disrepair has been resolved, the accommodation is still affecting the health of the applicant or any person included on their housing application, the applicant will have to submit a new Medical Self-Assessment Form. In reaching a decision, the Council will consider whether the overall effect on the household is sufficiently severe to warrant inclusion in a higher band. It is paramount that the Medical Self-Assessment Form is completed fully with as much detail as possible to enable this process. It is not enough for the applicant to describe a medical condition, as

having a condition alone will not attract a higher priority. Incomplete forms will be returned to the applicant.

3. The Council Housing Medical Advisor will take into account all the housing circumstances (including any element of overcrowding, current floor level, requirement of additional bedrooms due to a medical condition, etc), which are described as affecting the health of the member or any person included in the household on the housing application. Any person living with the applicant and their household but who are not included on the housing application will not be considered. For example, a family of four; husband, wife and two children have applied for housing and are living with the husband's parents. Although the husband's parents both suffer medical conditions, as they are not included on the housing application, their circumstances will not be taken into account when considering any application for medical priority.
4. If the Council Housing Medical Advisor has made a recommendation, based on information provided by the member, for a specific type of property, i.e. ground floor only, and the priority awarded on medical grounds is Band 1 and 2 where the member consistently bids for properties that do not meet this requirement, an offer may not be made, the priority of the member will be reviewed and may be lowered. Before this action is taken, the bidding process will be discussed with the member and the property recommendation will be explained to ensure that they are aware that they should bid for specific types of properties and how to submit bids.
5. The Council Housing Medical Advisor's recommendation is not final and will be reviewed by the Lettings Team leader to ensure that the Council's Allocation Policy has been observed. If it is found that the Council Housing Medical Advisor's recommendation does not comply with the Allocation Policy, the Lettings Team Leader has discretion to override the recommendation. Recommendations for the award of Band 1 will always be reviewed by the Lettings Management Team and s/he will be required to complete a form to either approve or reject the recommendation.
6. The Council Housing Medical Advisor may defer his/her decision pending further information from an applicant GP/Consultant. This information must be requested on an agreed pro forma and the fee is to be met by Hounslow PCT.

In each case the recommendation is based on need, suitability and supply of housing. Applicants assessed as having medical priority will be placed in one of the following Bands, according to their level of need Band 1; Band 2 or no priority Band.

The decision made on the Medical Self-Assessment Form of medical priority will be notified to the member concerned in writing by the Housing Officer or Estate Manager. Members, who indicate dissatisfaction with the recommendations made by the Council's Housing Medical Advisor, are required to complete an Appeal for Medical Priority form. This must be submitted by Homeseekers and Homeless applicants to the Lettings Team or

for Transfer applicants to Hounslow Homes within 28 days from the date of the decision letter. Appeals submitted outside of this period will not be considered.

The Appeal for Medical Priority form requires that the applicant states their reason for submitting an appeal and to supply additional evidence to support the appeal. The appropriate management team will consider the appeal and if necessary may seek advice from the Council's Housing Medical Advisor. Medical appeals will not be forwarded to the Council's Housing Medical Advisor if the information contained within only duplicates information previously supplied and has already been considered. The applicant will be informed of the decision made regarding their appeal in writing. There is no further appeal mechanism.

### **Mobility Needs.**

Where an applicant or member of their household has a substantial and permanent physical disability, their housing options are carefully considered.

### **Mobility Groups.**

Applicants who have a disability or medical need, which would require a specific property type, and/or property adaptations in order to meet their needs, would be let to a particular mobility group. This group would identify the level of need of the applicant in terms of their housing. When properties are advertised with particular adaptations, the Lettings Team and all partner organisations would label their properties with a particular mobility group number. This enables applicants that have been assigned a mobility group to find a property, which would match that level of need. For instance a member would be advised that they are categorised as Mobility Group need and therefore they would require a property of the same level in order to meet their needs.

- a) Mobility Group 1 – Suitable for wheelchair use indoors and outdoors (defined by symbol and white bar)
- b) Mobility Group 2 – Suitable for people who cannot manage steps or stairs and may use a wheelchair some of the day (defined by symbol and white bar)
- c) Mobility Group 3 - Suitable for people only able to manage 1 or 2 steps or small flights of internal/external stairs (defined by symbol and white bar)

The above mobility level groups have been adopted by all Locata partners

### **Identifying mobility needs.**

If an applicant is assessed as having mobility need, the relevant Team would refer this to the Housing Occupational Therapist. Applicants must complete a medical form to highlight mobility needs and supply additional documentation. The Occupational Therapists (OT) upon assessment will make a decision on

the Mobility level. The OT would be required to carry out a home visit to the client, in order that their medical and mobility needs could be assessed further. The OT Department would, upon completion of a home visit, provide the Lettings Team with a report on how their housing needs would be met e.g. property type recommendations and adaptations required.

All applicants with OT reports are advised in writing as to the property type and/or adaptations that have been recommended in the OT report. This procedure would follow on from a property recommendation made by the Council's Housing Medical Advisor.

Once OT reports have been received, the Lettings Management Team will update application details on the housing database for all non-homeless home seeker cases and for transfer cases, these will be updated by the relevant housing manager of Hounslow Homes. All future allocations are made with the OT recommendations in mind and therefore the allocations would be suitable for the needs of the applicant. The Homeless Persons Unit will be responsible for updating application details on the housing database for homeless home seeker cases.

#### **Offers of suitable accommodation for mobility need clients.**

Some housing stock may be designated for wheelchair or disabled users due to the nature of the property type and/or adaptations. These properties will be advertised with priority given to applicants requiring such units.

If a property is advertised as a mobility level unit then only applicants meeting that particular mobility need will be shortlisted and have the possibility of being considered for an offer. If a property is not advertised as a mobility property, but later transpires that it is, offers for this property can be withdrawn from applicants who do not meet the criteria. Due to the demand for adapted housing stock exceeding the Council's supply, all applicants in need of such housing will be advised that their waiting times could be far longer than those waiting for general needs accommodation.

In order to ensure that all applicants are given the opportunity to exert choice when seeking permanent accommodation and that some groups are not disadvantaged simply due to their medical needs, mobility applicants are advised to bid for properties of a general needs nature. Mobility members will be given basic property guidelines to follow such as they must only bid for a ground floor flat or they could manage a property if there was lift access.

An OT would be required to view a property prior to any offer being made to assess suitability, irrespective of whether the property is adapted or not. If once visited, the OT recommends that the property would **not** be suitable, the offer is not made to the member. If the OT recommends the property to be suitable, only then will a formal offer be made and the member will be invited to view the property. Their OT would/may accompany the applicants to the viewing.



If the situation arises where the applicant disagrees with the OT's recommendation that the property on offer is suitable for the needs of the member or the person in their household with the mobility need, the Lettings Team will accept the decision of the OT. In the event that the applicant challenges the decision made by the OT in regards to the suitability of the property, the Lettings Team Leader will conduct a review of the priority awarded and the property recommendation made. A consequence of this review may be that the priority of the applicant is lowered and the property recommendation, e.g. ground floor only is removed.

### **7.12 How we let to homeless households under the Policy.**

This part applies to applicants who are considered to be homeless under Part VII of the 1996 Housing Act (as amended). The Local Authority has a legal duty to secure temporary accommodation for households who are unintentionally homeless, eligible and in a priority need category. However, the Localism Act 2011 allows the Council the power to end any homeless duty in the private rented sector with a 12 month suitable fixed term tenancy. Once a suitable property has been offered the homeless duty will end as will the applicant's statutory 'Reasonable Preference' status under this policy. Given the length of time households have to wait for an offer of social housing it is anticipated that the vast majority of accepted homeless households will have their duty ended with a 12 month Private Rented Sector offer. Therefore effectively the link between being accepted as homeless and obtaining social housing as a result will be broken.

#### **Choice and homelessness.**

For cases for which the Council has accepted a full homeless duty under sections 193(2) or 195(2) of Part VII Housing Act 1996 (this will predominantly existing pre Localism Act enactment cases that are protected under the previous homelessness legislation) applicants can exercise choice for a 'bidding period' of 12 weeks after which time regardless of whether suitable properties have become available, the Council is entitled to make a direct offer which will fully end its Part 7 Homelessness duty although the Council reserves the right to make a direct offer at any time.

Where a homeless applicant bids for accommodation and is successful, the offer will be the applicant's final offer as long as it is suitable and will end the Council's homelessness duty if the offer is refused. The offer will always be confirmed in writing stating that this is the final offer that will end the Council's duty to the applicant under part VII of the 1996 Housing Act (as amended). Any offer will normally last for 48 hours from the date of the letter but this may be extended at the discretion of the Council or relevant Registered Provider.

Where a property is refused the Council's homelessness Assessment and Prevention Team will be informed immediately by the relevant organisation, a decision will be made on the suitability of the offer within 48 hours during which time the property must remain available.

This 'bidding period' may be extended at the discretion of the Council in the following circumstances:-

- That the applicant has not fully understood what he or she was expected to do under the policy;
- That the applicant was incapable of accessing the Housing Register without advice and assistance and this advice and assistance was not given,

Where a homeless applicant refuses an offer of accommodation made under the policy, they have the right to request a review of the suitability of the accommodation they have been offered in discharge of the Council's Part VII duty. Homeless Applicants are therefore encouraged to accept the offer that has been made to them, even if they intend to request a review of its suitability.

### **7.13 How serious offenders are dealt with under the Policy.**

Hounslow Council will make an assessment of risk to the community of any applicant who has been convicted of a criminal offence and is considered to present a significant risk to potential neighbours and/or communities. This will include applicants assessed as a risk through the MAPPA panel arrangements.

At the time of registration, an applicant will be asked if s/he or anyone who will be residing with them has a conviction of a criminal offence or anti-social behaviour order.

The question is asked of all applicants. If the applicant answers yes, a supplementary set of questions will be asked and permission sought from the applicant to contact the Police and/or Probation Service.

The result will be one of the following:-

- a) Some applicants will be assessed as not qualifying due to evidence of past unacceptable behaviour.
- b) Some applicants will be deemed lower risk providing they agree to and sign up to a behaviour contract. On a case by case basis the Council may only make offers to certain applicants when an appropriate package of support is in place.

### **7.14 Succession.**

The law on succession rights is found at Sections 87 to 89 of the Housing Act 1985 and Sections 131 to 133 of the Housing Act 1996. Succession rights apply to both secure and introductory tenancies. This Allocation Policy considers the following types of succession:-

- Statutory Tenancy Succession.
- Contractual Tenancy Succession.
- Discretionary Tenancy Succession.

### **Statutory Tenancy Succession.**

Under the Localism Act 2011 only partners of deceased tenants have a right to succeed to the tenancy.

### **Discretionary Successions.**

The Council will grant a discretionary succession in the following circumstances.

- To surviving relatives/partners of deceased tenants where they are left in a property they occupied for a minimum of 10 years as their principal home with the deceased tenant, immediately prior to the death of the tenant, and the individual is not under occupying a property. Where the successor is under occupying a larger unit they can be offered a property of an appropriate size for their needs. This will be offered via direct offer.
- To full time live in non-paid carers where verification checks with Hounslow's Children's Services and Lifelong Learning Department and the Benefits Agency etc. have confirmed the carer's status, and s/he has lived in the property as his/her principal home for 2 or more years.
- Continuous years immediately prior to the death of the tenant and would not be under-occupying the property.

### **7.15 Joint Tenancies.**

This Allocation Policy supports adult applicants wishing to sign as joint tenants should they choose to do so.

In relation to allocations to Registered Providers tenancies made under the Councils Nominations Agreement the individual Registered Provider will decide whether to allow a Joint Tenancy depending on the circumstances of the case.

### **7.16 Transfer of Tenancy.**

When a relationship breaks down and one partner terminates a joint tenancy, the Council, delegated as appropriate, may 're-grant' a tenancy of the same property to the partner remaining in occupation.

When a relationship is formed or when an adult child wishes to become a joint tenant with their parent, the Council, delegated as appropriate, can agree to

the tenancy being changed from a sole tenancy to a joint tenancy or vice versa. However, this is a 're-grant' of a tenancy and the Council can refuse to do this in certain circumstances e.g. where the tenancy is in arrears or where the proposed joint tenant is ineligible on the grounds of his/her behaviour. The Council, delegated as appropriate, may take into account the following when deciding to exercise the above discretions in favour of an applicant:-

- Whether the rent account is free of arrears if your account is found to be in arrears then you will be required to clear the arrears in full unless agreed by the Lettings Team Leader.
- Whether the property would pass a Pre-Termination Inspection.

### **7.17 Advice and Assistance.**

The Council acknowledges that (except in certain circumstances) this Allocations Policy requires the active participation of housing applicants and to reflect this fact the Council aims to provide advice and assistance to ensure that no person is disadvantaged by the way the Policy operates.

General Information about the Policy will be made available as follows:-

- Information about the procedures for applying to go onto the Housing Register and for applying for advertised vacancies;
- Information about how applicants are prioritised under this Policy;
- How successful applicants will be selected;
- Rules on how properties will be advertised including bidding cycles and quota labelling;
- Information about review procedures;

Applicants will be provided with information regarding their own application which will include:-

- What Band they are awarded under this Policy;
- What properties they are entitled to bid for.
- What their chances are of bidding successfully on the property types and areas in which they are interested.
- What information they need to supply in regard to verification and when this information will need to be provided.
- If they are awarded reduced priority or are found to be ineligible what they need to do to rectify this.

For applicants who are not accepted onto the Housing Register, they will be offered advice and information on alternative Housing options.

This would be in the form of information leaflets and signposting to relevant agencies.

Applicants who have any difficulty reading or understanding this Allocations Policy will be offered the following services:-

- An interpretation service if their first language is not English.
- Signing if speech or hearing is impaired.
- Provision of documents in large print if an applicant is visually impaired.
- Easy Read format
- An interview to explain the content of this document and information about where independent advice can be obtained about the Council's Policy.

## **8. SERVICE STANDARDS.**

### **8.1 The Council's Service Standard for administering the Policy.**

The Council will consider every application received and:-

- Make sure the Council meets its legal obligations when allocating all accommodation including nominating people to accommodation owned by Registered Social Landlords.
- Provide free advice and information about the right to apply for accommodation.
- Provide free assistance to applicants who may have difficulty when making an application.
- Make sure any information provided is easy to understand and is readily accessible.
- Outline how we offer choice and the ability for applicants to express preference.
- Provide information to all applicants of what types of accommodation are available throughout the Borough.
- Provide information about how long applicants are likely to have to wait before being nominated to accommodation.
- Provide a full copy or a summary of this Allocation Policy to all households who request them and will always provide a short summary of the policy to all who are accepted as being owed a full duty as statutorily homeless.
- Treat each applicant equally in accordance with their need and where possible their choices, regardless of race, religion or creed, ethnic or national origin, disability, gender, sexual orientation or marital status.
- Regularly monitor ethnic origin and disability of applicants who apply for accommodation.
- Ensure that all information provided by applicants will be treated in strictest confidence. The Council will comply fully with the Data Protection Act in relation to all information it holds about applicants.

## **9. Equality and Diversity.**

The Council's aim is to implement and maintain services which ensure that no potential or current applicant is treated less favourably on the grounds of gender, marital status, race, nationality, ethnic or national origin, disability, age or sexual orientation, nor is disadvantaged by the application of a rule, condition, or requirement, which has a discriminatory effect which cannot be

justified by law. Allocations will only be made to those persons who are eligible. The Policy will fully comply with the Equality Act 2010.

This Allocation Policy will be subject to periodic equality impact assessments.

## **10. LEGAL DUTIES AND HOW TO MAKE A COMPLAINT.**

### **10.1 Confidentiality.**

Personal information provided to the Council by housing applicants is confidential. In normal circumstances, this information is only disclosed to landlords participating in the Choice Based Letting Scheme within Hounslow Borough to enable them to consider an application and to determine whether an offer of accommodation can be made. Applicants give their consent to this disclosure in completing the Housing Register application.

Personal information is only disclosed to other parties with the applicants consent or in exceptional circumstances where disclosure without consent is warranted. These are defined as follows:

- Where there are over-riding legal, social or public interest considerations, for example there is a risk of seriously harm to the person themselves or to others if the information is not disclosed.
- Where the information is required by a local authority department to carry out statutory functions or external auditors
- Where the information is required by the police as part of a criminal investigation.

Medical information obtained from an applicant's GP or other healthcare staff cannot be passed on without prior consent from the professional(s) involved.

At the short-listing stage, relevant information including details from the Housing Register may be copied to the new landlord where applicable.

### **10.2 Data Protection and Information Sharing.**

All applicants for housing have the right to see Information held about them by the Council, in accordance with the Data Protection Act 1998. The right applies to all personal information regardless of the date that information was recorded. With regard to housing application records, applicants have a right of access to information held about themselves, and members of their family held for the purposes of that application. This right of access extends only to "personal" information, namely, factual information and expressions of opinion, which relate to a living individual. In certain circumstances the Council may refuse access. This arises where, for example, the information:-

- May identify a third party and that party has not consented to the Disclosure;
- Concerns an individuals health, and disclosure may cause serious harm to the wellbeing of the applicant; or

- Is held for the purpose of prevention or detection of crime or in respect of some other legal proceedings.

Requests for access to records must be made in writing to the Freedom of Information Officer. Subject to the above exceptions and consents, applicants should be given the option to either view the records or have a copy provided within 40 days of the application. A fee may be charged for this service. Applicants have the right to challenge the accuracy of the information held on them and may request the erasure or correction of records which they believe to be inaccurate. If the Lettings Team Leader agrees that the information is inaccurate, the record will be corrected and the applicant will be given a copy of the corrected documentation. If the Lettings Team Leader does not agree the information is inaccurate, or refuses access to the information, the applicant has a right of appeal.

### **10.3 Information sharing without consent.**

Information may be shared about the individual and their history irrespective of whether their consent has been obtained in exceptional circumstances which will include:

- In accordance with the provisions of the Crime and Disorder Act 1998 (Section 115).
- Where there is a serious threat to the other party's staff or contractors.
- Where information is relevant to the management or support duties of the proposed landlord or support organisation to ensure the health and safety of the applicant, a member of his or her household, or a member of staff.

### **10.4 False statements or withheld information.**

It is a criminal offence for applicants and/or anyone providing information to this Policy to knowingly or recklessly make false statements or knowingly withhold reasonably requested information relevant to their application (S171 Housing Act 1996). This includes but is not limited to information requested on the housing registration form, in response to correspondence at the renewal of the application, or relating to any other review of the application. An offence is committed if a third party provides false information whether or not on the instigation of the applicant. This would apply at any stage of the application process.

Where there is suspicion or an allegation that a person has either provided false information or has withheld information, the application will be given the status 'application is pending' during the investigation and will be excluded from being considered for offers until an outcome is reached.

If the outcome of any investigation is that they did not provide false information or there was no withholding of information or such was not found to be withheld knowingly, then the application will be reinstated from the date of registration meaning the relevant applicant should not suffer prejudice.

However, where the investigation shows that false information was provided on the application form, or was deliberately withheld, this may render the applicant ineligible.

Ground 5 in Schedule 2 to the Housing Act 1985 (as amended by the 1996 Act, S146) enables the landlord to seek possession of a property where it has been granted as a result of a false statement by either the tenant or a person acting at the tenants instigation. Where this is the case the Council will pursue recovery of possession vigorously.

If the Council determines that an applicant directly, or through a person acting on his or her behalf, has given false information or withheld required information it may result in an applicant being removed from the Housing Register and rendered Ineligible.

## **10.5 Reviews and Appeals.**

### **General Information.**

Applicants have the right to request such general information as will enable them to assess:-

- How their application will be treated and whether they will be given any preference.
- Whether housing accommodation appropriate to their needs is likely to become available and how long they may have to wait for an allocation of such accommodation.

### **Information about decisions and reviews**

Applicants have the following further and specific rights to information about decisions and rights of review of decisions:-

- The right, on request, to be informed of any decision about the facts of their case which has been, or is likely to be, taken into account in considering whether to make an allocation to them.
- The right, on request, to review a decision mentioned above, or a decision to treat them as ineligible or not qualifying to be a member of the Allocation Policy.
- The right to be informed of the decision on the review and grounds for it.

Applicants should request a review in writing within 21 days of being notified of a decision. The Council will determine the review within 56 days of the request or such longer period as may be agreed with the applicant. The Council will notify the applicant of the outcome of the review including the reasons if the original decision is confirmed. The Council's decision on review is final and any challenge to that decision can only be made through judicial review proceedings.



Reviews will be carried out by a senior member of staff at Hounslow Council or delegated to an appropriate officer who was not involved in the original decision.

### **10.6 Review of Suitability – Homeless Applicants.**

Whether or not a homeless applicant accepts an offer of accommodation made under the Policy, they have the right to request a review of the suitability of the accommodation they have been offered. Homeless Applicants are therefore encouraged to accept the offer that has been made to them, even if they intend to request a review of its suitability. If the applicant has been accepted as being owed a statutory duty by the Council, this duty, subject to a right of review, will have ceased if the property is refused. In such circumstances an applicant will no longer be entitled to any duty, will have to leave any temporary accommodation provided and make alternative accommodation arrangements.

### **10.7 Complaints.**

An applicant who is not satisfied with the service that they receive may register a complaint with the Council's Complaint procedure by telephone, e-mail or in person. All complaints will be acknowledged and investigated.

The best way to make a complaint is to do it directly. Making a complaint locally to the department will give the quickest results and get a response from those who are fully aware of the issues surrounding the complaint.

A complaint can be made in person, by telephone, by post or by online form. The complaint will be answered within fifteen working days, or an explanation given if it will take longer.

The applicant can ask someone else or an organisation such as Citizen's Advice Bureau to make a complaint on their behalf. For those whose first language is not English, assistance can be obtained from the Council.

#### **Contact:**

**Housing Complaints,  
Customer Relations Team  
London Borough of Hounslow  
Civic Centre, Lampton Road,  
Hounslow, TW3 4DN  
T: 0208 583 4245  
E: [Housing.Complaints@hounslow.gov.uk](mailto:Housing.Complaints@hounslow.gov.uk)**

If an applicant remains dissatisfied having followed all stages of the Council's complaints procedure then they may like to take this matter further by elevating to the Local Government Ombudsman.

### **Joint Assessment Referral Panel (JARP)**

The Housing Allocation Policy 2012/2013 sets out the Council's rules and duties in relation to the assessment and allocation of Social Housing in Hounslow. However, there are a percentage of cases where the nature of the client's circumstances coupled with their level of vulnerability warrants consideration for a higher rehousing priority. These are individual cases which cannot easily be defined by the Allocation Policy. In such instances, rehousing decisions are made by a panel of officers.

The Joint Assessment and Referral Panel [JARP] is a London Borough of Hounslow led multi-agency panel which allows members the opportunity to jointly assess the rehousing needs of vulnerable clients/households. A joint assessment process ensures that vulnerable clients are appropriately banded and rehoused [up to and including emergency rehousing] and receive targeted support as part of a rehousing package that suits their particular needs. The JARP model will replace existing panels and will be fully incorporated into the Council's new Allocations Policy, which will be implemented in 2012.

#### **1.0 Eligibility Criteria.**

Clients with the following tenure types will be eligible to be referred to JARP:-

- Hounslow Homes Tenants.
- Private Tenants.
- RSL Tenants.
- General Home Seekers.
- Homeless Home Seekers.

#### **To be eligible for referral to the JARP – a client must be:-**

- a. Either resident within the London Borough of Hounslow or a person that Hounslow retains a duty towards e.g. where the client has been placed in temporary accommodation in another Local Authority area by Hounslow.
- b. Be registered and banded on the Council's Housing Register and Housing Registered number submitted with Referral Form

#### **The JARP will consider the following circumstances:-**

- a. Households with multiple or complex support and rehousing needs
- b. Victim of crime of a serious nature such as sexual assault, physical assault relating to the area and when the victim remains vulnerable by remaining in the property
- c. High risk of imminent danger linked to the property which can only be alleviated by an emergency move

- d. Traumatic event linked to the property where remaining in the property is likely to result in long term suffering of a serious possibly life threatening nature
- e. Hounslow homes Management move where sensitive or difficult situations have to be managed
- f. Requirement for a specific type of adapted property where the move cannot be adequately managed through Locata and where current accommodation cannot be adapted
- g. Severe and ongoing harassment from neighbours when it is unlikely any other course of action will prevent further incident
- h. Witness to a crime which has placed the witness at risk
- i. Special circumstances, e.g. a complex or high profile public protection case where other housing options have been exhausted
- j. All JARP cases who have been awarded Band A in the past with a view to monitoring whether the client has been rehoused and/or requires additional support as part of the Panel case review process
- k. Any other exceptional case which falls outside of Allocation Policy and Scheme

## **2.0 Chairing arrangements and panel membership.**

The JARP will be chaired by a senior representative from the Housing Options and Solutions Service, most likely the Head of Service. The JARP core panel will comprise of:-

- Lettings Team Leader (if not Chair).
- Senior Allocations Officer (in role as JARP Coordinator).
- Resettlement Team Leader.
- Housing Manager from Hounslow Homes.
- Representative from Children's Services.
- Representative from Adult Social services.
- Representative from Probation Service.
- Representative from Registered Providers.
- Representative from Community Safety Unit or Domestic Violence Service.

It is proposed that organisations/individuals be invited to join the JARP with a requirement to nominate a representative/s as part of a service level agreement.

## **3.0 Referral procedures.**

Participating agencies must complete a standard referral from giving details of the client's circumstances, housing need and vulnerability [See Appendix A]. N.B. only cases meeting eligibility criteria can be referred to JARP. All referrals forms must be accompanied by guidance notes [see Appendix B]

All referrals must be made by an agency/organisation/department and must be in writing using a standard proformas and forwarded to the JARP Coordinator/s for processing. N.B. a client/applicant is not permitted to self

refer to the JARP. All supporting evidence/documents must accompany referral form, examples of which appear below [this is not an exhaustive list]:

- Care plan.
- Risk assessments.
- Police reports.
- Safeguarding reports.
- Medical reports.

In the majority of cases, it may not be considered necessary for the referrer to attend JARP to present the case, as all information for assessment will be provided prior to the meeting, and any missing information or clarification of information will be picked up prior to the case being listed for JARP to consider. In exceptional cases, the Chair may consider inviting the referrer to attend if the case is particularly sensitive or it would assist the Panel in the decision making if the case is of a complex nature. It is hoped that with the range of skills and knowledge of the Panel members that there will be sufficient knowledge and experience to be able to understand the information provided and consider the individual factors of the case.

#### **4.0 Decision making process during panel.**

The Chair is responsible for managing the decision making process to ensure that decisions reached are:

- a. Inclusive
- b. In line with the Councils Allocation Policy and Allocation Scheme
- c. Fair and transparent
- d. Documented and minuted in line with JARP procedures
- e. In line with the Councils commitment to Equality and Diversity

All decisions and recommendations must be documented and fed back to the referring agency that will be responsible for conveying outcome to JARP applicant/client.

#### **Right of Appeal against the decision/recommendation of JARP.**

There is a general right to complain/review within the wider Allocations Policy therefore JARP applicants will have recourse to right of review under Allocation Policy. Details of which will be contained within the decision letter issued by the JARP.

Where a JARP applicant wishes to bring to the panel's attention some new material facts which did not form part of the original referral – this will be considered by the JARP chair who will determine whether the case will be referred to the next JARP meeting.

## 5.0 Monitoring and reviewing the work of the JARP.

The JARP coordinator/s will be responsible for producing a quarterly report which will be forwarded to HMT. The report will contain the following:-

- a. Total cases presented.
- b. Summary of outcomes based on the following prescribed outcome codes.

Outcome code	Description	Frequency	Responsible officer	Additional comments
Ref1	Total referrals received	Quarterly	Coordinator	
JARP1	Total JARP applicants recommended for a change in Banding	Quarterly	Coordinator	
JARP2	Total JARP applicants rehoused within 6 month of rehousing recommendation	Quarterly	Coordinator	

## 6.0 Requirements for attendance at panel meetings.

Further to the approval of Terms of Reference, a service level agreement will be drawn up with relevant stakeholders. The Service Level Agreement will set out obligations and responsibilities in relation to attendance and participation.

## 7.0 Co-ordination.

The JARP will be coordinated by the London Borough of Hounslow Housing Options and Solutions Services. It is anticipated that the JARP Coordinator/s will be expected to carry out the following functions and duties:-

- Receiving and screening referrals from participating agencies to ensure referral criteria is met
- Ensuring that all relevant paperwork accompanies incoming referrals
- Ensuring that Housing Registration number is contained on all incoming referral forms
- Sending out agendas for meetings and setting the dates of panel meetings
- Arranging venue and refreshments as applicable for all panel meetings
- Convene the relevant agencies for panel meetings
- Ensuring that case summaries /papers are distributed in advance of all panel meetings
- Ensuring that any actions arising from panel meetings are progressed up to and including issuing written decision letters to clients via the referral agency

- Ensuring that copy of decision letter is added to the applicants housing file
- Ensuring that Policies and procedures are in place to support the work of JARP
- Ensuring that confidentiality policy is adhered to , including the secure housing of paper and computer based documents/information
- Produce regular performance/outcome reports
- Any other duties commensurate with role or as determined by Chair

## **8.0 Frequency and Extraordinary meetings.**

Meetings will be held on a monthly basis [although this may vary depending upon volume of referrals] and a schedule for the period 2012 – 2013 will be produced and circulated to all members of the panel.

Any member of JARP core panel may at any time request an extraordinary meeting if an urgent case requires attention/input from the panel. All requests will need to be made via the JARP Coordinator/s who will liaise with Chair to determine whether an extraordinary meeting can be held: in person or virtually i.e. via telephone conference.

The JARP meeting is expected to last no longer than ½ a day and the JARP coordinator is expected to ensure that cases are prioritised and listed within a ½ day time frame.

## **9.0 Confidentiality.**

The JARP will be subject to the dictates of Hounslow Corporate Confidentiality Policy - details of which can be found at the following link;

<http://intranet.hounslow.gov.uk/confidentiality.pdf>

## **10.0 Information Sharing Protocol.**

The JARP will be subject to the dictates of the Hounslow Community Information sharing protocol – details of which can be found at the following link:

[http://intranet.hounslow.gov.uk/isp\\_staff\\_guidance.pdf](http://intranet.hounslow.gov.uk/isp_staff_guidance.pdf)

## **11.0 Quality Assurance Framework [QAF].**

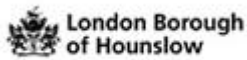
All officers shall work in accordance with [Hounslow Council's Customer Care Policy](#) and any relevant service standards, as set out in the [Customer Care Charter](#), and the Confidentiality and Access to Files Procedure and/or other relevant policy documents.

## **12.0 Equality and Diversity.**

All officers shall have due regard for the London Borough of [Hounslow Equal Opportunities & Diversity Policy](#) when dealing with customers, other staff members and stakeholders.

Officers shall ensure that they provide an equitable service, with positive regard and fair treatment for all communities regardless of age, colour, ethnic or national origin, nationality, race, appearance, religious belief, gender, marital status, sexuality, responsibility for dependants, disability, HIV, AIDS or any other health status, trade union or political activity, and any other disadvantaged group in society.

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**Joint Assessment Panel – Agency Referral form**

The following referral form must be completed in full. Please carefully read guidance notes attached. NB: All supporting documentation must be submitted with this form.

<b>Referring officer name:</b> <b>Referral agency/department :</b> <b>Contact number:</b> <b>Email address:</b>		<b>Date:</b>	
<b>Client Full name:</b> Mr/Mrs/Ms		<b>Housing Registration number:</b>	
Client address including postcode:			
<b>Reason for referral: [see guidance notes attached]</b>			
Please use additional sheets if necessary and ensure that you attach <b>supporting documents</b>			
<b>Please provide names of agencies involved with this household i.e. Social worker, CPN etc</b>			
Officer /Department name		Contact number	
<b>Family composition</b>			
Full Name		Gender	Date of Birth




For office use only

Referral accepted Y/N

Outcome code

JARP panel date:

Completed by: Signature .....PRINT name .....

Date:

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## Joint Assessment Panel – Agency Referral guidance notes

### About the Joint Assessment Referral Panel [JARP]

The Joint Assessment and Referral Panel [JARP] is a LB Hounslow led multi-agency panel which allows members the opportunity to jointly assess the rehousing needs of vulnerable clients/households. The joint assessment process aims to ensure that vulnerable clients are appropriately banded and rehoused [up to and including emergency rehousing] and receive targeted support as part of a rehousing package that suits their particular needs.

### Referral criteria?

#### To be eligible for referral to the JARP – a client must be:

- c. Either resident within LB Hounslow or a person that LB Hounslow retains a duty towards e.g. where the client has been placed in temporary accommodation in another Local Authority area by LB Hounslow
- d. Be registered and banded on Hounslow Councils Housing Register and Housing registration number must be added to referral form

### What types of cases are heard at JARP?

- a. Households with multiple or complex support and rehousing needs
- b. Victim of crime of a serious nature such as sexual assault, physical assault relating to the area and when the victim remains vulnerable by remaining in the property
- c. High risk of imminent danger linked to the property which can only be alleviated by an emergency move
- d. Traumatic event linked to the property where remaining in the property is likely to result in long term suffering of a serious possibly life threatening nature
- e. Hounslow homes Management move where sensitive or difficult situations have to be managed
- f. Requirement for a specific type of adapted property where the move cannot be adequately managed through Locata
- g. Severe and ongoing harassment from neighbours when it is unlikely any other course of action will prevent further incident
- h. Witness to a crime which has placed the witness at risk
- j. Special circumstances, e.g. a complex or high profile public protection case
- k. All JARP cases who have been awarded Band A in the past - with a view to monitoring whether the client has been rehoused and/or requires additional support

I. Any other exceptional case which falls outside of Allocation Policy and Scheme

#### How to make a referral?

Referrals are made using the attached referral form. The referral form must be completed in full and forwarded to [Letting Team email address TBC] along with all supporting documents.

#### What documents need to be provided?

Along with the referral form we would expect you to provide the following types of supporting information/documentation [this is not an exhaustive list]

- Care plan
- Risk assessments
- Police reports
- Safeguarding reports
- Medical reports

#### How are decisions made and how will I know outcome?

Decisions are made by a multi-agency panel , all decisions are formally recorded and the Chair of the panel takes overall responsibility for ensuring that decisions are transparent , inclusive and in line with the Councils procedures and policies. Once a decision has been made, the JARP Coordinator will write to you giving details of the recommendations made by the panel. The Coordinator will also contact you, if for example, additional information is required.

#### Can the client appeal against a decision made by the JARP?

There is a general right to complain/review within the wider Allocations Policy therefore JARP applicants will have recourse to right of review under Allocation Policy. Details of which will be contained within the decision letter issued by the JARP.

Where a JARP applicant wishes to bring to the panel's attention some new material facts which did not form part of the original referral – this will be considered by the JARP chair who will determine whether the case will be referred to the next JARP meeting.

**Please complete referral form and attach all supporting documents and send to [Letting Team email address TBC] Housing Options and Solutions.**

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### **Pan London Mobility Scheme.**

The Pan London Mobility (PLM) Scheme – *Housing Moves* is a new housing mobility service for London's social tenants. It facilitates cross borough moves within the social rented sector. Boroughs and Housing Associations contribute 5% of their lettings into a Pan London pool and tenants bid for the pooled properties.

The PLM Scheme is designed to add value to existing local, sub-regional and regional mobility schemes, yet it also marks a step change in housing mobility options for tenants. It does this by, for the first time in many years, providing a consistent, fair and transparent way of moving around London.

Participants will not gain or lose properties overall from the scheme. The number of moves into any Borough will, over time, be matched by the number of moves out of that Borough.

The PLM Scheme will prioritise under occupiers, those in work, and those who wish to move to provide care and support to a family members or friends. Most other social tenants are also eligible for moves.

In line with established methods of advertising Social Housing to applicants, the PLM Scheme will use a web-based Choice Based Lettings (CBL) system to facilitate lettings. This will be procured, paid from and hosted by the Greater London Authority (GLA). Tenants will apply and bid through this system.

Initially, there will be up to 1,400 properties per year available to the PLM Scheme.

The PLM Scheme is based on a set of 'high level principles' agreed by the Homes and Communities Agency (HCA) London Board. These were agreed following a consultation on the Mayor's proposals for a PLM Scheme.

The principles are that the PLM Scheme should be based on a contribution of re-lets to existing social homes; this proportion should be 'notional'. That is, Boroughs can choose to contribute new build or general re-lets as they see fit, but that the calculation of homes to be contributed should be determined by a Borough's predicted number of re-lets rather than new build; the Pan London Mobility Scheme should be reciprocal with each Borough and RSL contributing 5% of their lettings.

Boroughs/RSL's should have as much flexibility as possible as to the actual homes they contribute, as long as the number of homes contributed is equivalent to 10% of re-lets, and that the mix of homes is proportionate to their overall re-lets of 1, 2 and 3 bed homes, and accessible homes; the scheme should be integrated or aligned with the London Accessible Housing Register and the G15 mobility pilot and become operational during 2011/12;

and, Affordable Rent homes will be excluded from the scheme from the outset.

The PLM Scheme will advertise the equivalent of 5% of each Borough's re-lets to social rented homes, each year. Re-lets are defined as Borough lets to Borough stock minus transfers, plus Borough nominations to Housing Association stock minus transfers, over a given year. For Boroughs with no stock, re-lets are Borough nominations to Housing Association stock minus transfers.

Affordable Rent re-lets are initially excluded from the scheme. This is because the product is very new and there remain uncertainties as to how it would interact with a mobility scheme.

The contribution will be broken down by bed size. The contribution will contain the same proportion of 1 bed homes, 2 bed homes and 3 bed homes as the profile of the Borough's entire turnover of re-lets. Boroughs are also required to contribute a reasonable proportion of accessible homes to the scheme.

The PLM Scheme will be reciprocal. The PLM Scheme should have no net impact on a Borough's stock and lettings, irrespective of the total volume of moves to or from that Borough.

To achieve this, there will be a 'triple lock' in place. Firstly, an automatic quarterly equalisation process will prevent large inequities building up. Secondly, an annual equalisation process will deal with any outstanding equalisation issues - the aim will be to start each new year at zero.

As an ultimate guarantee, if equalisation has still not occurred after four quarters and the above measures have not worked, Boroughs will put no properties into the scheme in the following year, or permit no tenants from a certain Borough to bid for properties through the scheme, until equalised. Bedsize will be reflected in equalisation.

Housing Associations may also contribute a proportion of their own nominations to properties (their 'true voids') in addition to their nominations contributed by Boroughs. Housing Association true voids are defined as total Housing Association lets to Housing Association stock, minus Borough nominations to Housing Association stock, minus transfers over a given year.

## **Alternative Housing Options**

### **Mutual Exchange:**

Both "secure" council and housing association tenants, in England, Wales, Northern Ireland and Scotland, who occupy permanent self-contained accommodation, have a legal right to exchange their tenancies under Section 92 of the Housing Act 1985. "Assured" housing association tenants, and "Assured Shorthold" tenants in the private sector, also have this right if it is granted as part of their tenancy agreement. There can be two, or even three-way, exchanges and the landlord of each have to consent in writing.

Mutual exchanges are essentially a self-help process. Tenants are expected to find their own exchange partner either through the official mutual exchange scheme "HOMESWAP" run by HOMES, or informally through private adverts in shop windows; or, through family/friends/neighbours.

Where a Council tenant expresses an interest in a mutual exchange by personal enquiry, the Housing Options & Advice Officer gives them a "HOMESWAP Exchange Registration Form" to complete and return directly to them) in the Lettings Support Services Team.

They may also register themselves directly on the system if they have access to a computer.

After receiving the completed "HOMESWAP Exchange Registration Form", the Housing Advice & Options Officer registers the application on the HOMES computer system. Before an exchange can take place, both exchange partners must get the respective landlord's permission to the exchange. Therefore, when a tenant finds a suitable exchange partner, be that from whatever source, irrespective of where they live and who their landlords are, all applicants must complete the Mutual Exchange Application form. Where there are two (or more) landlord's involved, applicants must make an application to the other landlords and must complete (and return) the required application forms for each.

### **Affordable Rents:**

At the moment Housing Associations rent most of their homes out at Social Rents. Housing Associations will now be allowed to offer some tenancies at higher rents which could be up to 80% of a market rent. This is called "Affordable Rent".

Housing Associations will be able to charge the "Affordable Rent" on new build homes and will also be allowed to let some of their existing properties to new tenants at Affordable Rents. Tenants will still be able to claim housing benefit to help with their rent.

Affordable rents on some larger homes are expected to be set at a lower percentage of a market rent in order to keep rents lower for families. This means that in some cases rents on larger homes will be the same as, or less than, rents on 1 & 2 bedroom homes.

These properties will be advertised within Locata and marked 'this property is being advertised at an affordable rent'.

### **InComE Project (Council Tenants only):**

The InComE project (Independence Accommodation Employment) can help you if you're a non-dependant adult who lives in an overcrowded home and you are not the tenancy holder.

It is open to those living in one of our properties, a council or another housing association property in one of the following London local authorities: Brent, Ealing, Hammersmith, Haringey, Harrow, Hillingdon, Hounslow and Kensington & Chelsea. The InComE project offers you independence, accommodation and employment.

You can become a qualified carpenter, hairdresser, youth worker, engineer, multi-skilled trade's person, electrician or almost anything you are prepared to work towards. If you are 18 or over and working, studying/training or willing to start you can apply.

We will support you along the way, so that means help from college, your employer and us. We will support you further by finding you accommodation in a housing association property while you study; with affordable housing association rents for usually two years. Once you have your qualifications and employment experience we will assist you to move into full independence.

### **Seaside & County Homes (55+):**

The scheme's landlords manage approximately 3,500 bungalows and flats: along the southwest coast from Cornwall, through the countryside from Shropshire to Cambridgeshire, over to Norfolk and Lincolnshire in the east.

This scheme does not guarantee you a move and priority is given to tenants who are giving up larger sized properties. Those applicants who are offered viewings and want to move must sign tenancies with participating Housing Associations. In addition to maintaining the property in accordance with their tenancy agreement an applicant that accepts a property with a garden will also assume responsibility for maintaining the garden, as well as the upkeep of trees and other foliage within the grounds of the property. This should be given proper consideration when accepting an offer.

The Seaside & Country Homes scheme is open to households living in Council or Housing Association housing in Greater London where at least one member of the household is aged 60 or above. In cases where other members of the households are under 60 years of age they must be either the



partner, joint tenant or registered carer of the lead applicant. We regret we are unable to consider applications where there are more than two persons on the application.

### **Private Rented accommodation:**

Information about private rented accommodation is often available and can be found:

- In local newspapers and magazines.
- In shop windows and notice boards.
- Through letting agencies and accommodation agencies.

You can find Estate Agents by looking in Yellow Pages or on the website at [www.yell.com](http://www.yell.com). You can also look in LOOT and other local newspapers. You can access the Internet free at Council offices but if you wants to access the internet at your local library and at internet cafés they may charge a small fee. You could also place an advert in a local newspaper, shop window or notice board. The advert should say what you are looking for and how much rent you could afford to pay.

### **New-build HomeBuy (formerly Shared Ownership):**

This is a scheme that aims to allow people with a household income of less than £62K the chance to part own a property usually by paying a mortgage on the share that you own, and a subsidised rent on the share that you don't own. As your income increases, you can increase the share that you own, until you eventually own 100% and no longer pay any rent to the Registered Social Landlord (RSL).

### **Intermediate Rent:**

This is a scheme that allows people to rent selected brand new or refurbished properties at around 20-30% lower than you would expect to pay for similar private rented properties in the same area. These properties are managed by a Registered Providers.

### **Rent to HomeBuy:**

This gives you the chance to save up for a deposit for a mortgage and to have a "trial run" before committing to buying a property. You can move into a newly built home and pay rent at only 80% of the market value for a fixed length of time. At the end you get to choose; to buy or not to buy. This option gives you choice and security. You can choose to rent or buy, but either way you can choose to move into a quality, affordable home.

### **HomeBuy Direct:**

This is a scheme where you can buy a newly built home on a designated HomeBuy Direct development with assistance from the Homes and

Communities Agency and the house-builder, in the form of two equity loans – an affordable mortgage for a minimum 70% of the total purchase price, and a maximum of 30% of the total purchase price in equity loans from the Agency and the house-builder.

### **London-wide Initiative:**

This is a shared-equity product available only to key workers across 15 developments in London. Unlike shared-ownership schemes, where purchasers pay rent on the part retained by the landlord as well as a mortgage on their share of the property, purchasers do not have to pay anything to finance the Government stake. The Government retains a percentage of the home, with no monthly payments due on the government share until you sell the home, or leave your key worker profession.

### **First Time Buyers Initiative:**

To qualify you will need to be a key worker. You will have to come up with 50% of the property's value. You can make up the 50% by a mixture of your own deposit and a mortgage for the rest of the cost. You will stand a better chance of being able to get a mortgage if it is for a smaller proportion of the property's value. The government will pay their 50% to the house builder of the new development. The government will then be entitled to a share of the money when you sell the house, which will match the contribution they put in.

More information about the schemes that are available in the London Borough of Hounslow are on the Council's website at:-

[www.hounslow.gov.uk/index/housing/low\\_cost\\_home\\_ownership](http://www.hounslow.gov.uk/index/housing/low_cost_home_ownership)

**National Witness Mobility Scheme (NWMS).**

The Council participates in the government funded National Witness Mobility Scheme, which gives local authorities and other social landlords and the police service access to a nationally coordinated fast track witness relocation scheme.

Witness who are intending to give evidence in civil and criminal cases such as domestic violence, hate crimes, anti social behaviour, gun crimes, sexual assault, child abuse and other serious crimes and consider that it is unsafe to remain in their home will be assessed by their local authority and a designated police officer.

If there is a serious risk to the witness, and it is unsafe for them to pursue normal homelessness routes, they can be offered the opportunity to relocate quickly away from the unsafe area. Referrals are made to/from the NWMS office.

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**Safe and Secure.**

Safe and Secure is a pan-London working arrangement, for London Boroughs, the Metropolitan Police, Probation, a range of Housing Associations and some voluntary organisations to use for high risk cases where individuals and families need to move from their current accommodation to another Borough or outside London altogether.

Safe and Secure:

- Provides a framework for local authorities to effectively manage difficult, high risk cases through partnership working within Boroughs and across Borough boundaries
- Sets out minimum standards for all boroughs and police teams to follow and adhere to, based around services and process in existence in every borough
- Sets out key processes for all stakeholders, covering referral, risk assessment, risk management, decision making, information sharing, sourcing short, interim and more settled accommodation, sourcing support packages for individuals and families
- The coordination of the approach ensures that the tailored support package provided can work in partnership with local services, sharing information to enable effective monitoring and evaluation and contributing to forward planning and decision making
- Provides a structure for co-ordinating and monitoring moves across the London boroughs, which can minimise the negative impacts upon boroughs likely to be net importers of those at high risk and balance out the dispersal
- Enables short term moves out of Borough for up to 12 weeks, during which time move on plans are made if the individual/family cannot return to their home.
- Creates a cross London framework which is potentially adaptable to incorporate other client groups who may need to move out of their original borough to escape violence of some sort – this also strengthens point 4 by balancing the dispersal
- Ensures through high level risk assessment and multi-agency decision making that this is not an easy route to obtaining social housing but is, in the worst cases a means to manage risk and in the least, another homelessness prevention option
- Fills a gap in current response provision, as it does not replicate existing schemes such as Witness Protection
- Ensures equal access and treatment for all clients regardless of age, ethnicity, religion, gender, disability or sexual orientation, due to the comprehensive risk and needs assessment, which determines the response and type and level of support each individual requires

The resettlement of people in London at risk of harm from serious, often gang related violence is not a simple matter nor is it the responsibility of any single agency. Some people who are at risk are victims who have no direct involvement in gangs.

Others are at risk due to associating with gang members, or are being targeted simply because they are related to a gang member. Also at risk are those individuals who have been directly involved in perpetrating violence but who are seeking an exit strategy from their gang or criminal lifestyle.

Safe and Secure is a cross-borough multi-agency approach to managing the risk of harm presented, through a staged process, which begins with considering options within the Borough, such as increased home security, but may ultimately result in transferring those individuals or families at high risk out of their current home and Borough for resettlement elsewhere.

It is the movement out of a local authority area which is the cross Borough Safe and Secure element and the provision of intensive transitional support to clients, which this protocol addresses.

There are two key aspects of Safe and Secure:-

- Safe accommodation outside of the originating borough and a support package.
- For those who have been involved in perpetrating gang related violence, a move will only be an option if the individual also signs up to an intense programme of specialist intervention, to ensure they exit the gang lifestyle for good.

The Safe and Secure approach engages and provides services to those individuals and their immediate families/carers that fall outside existing established mechanisms, which include:

- Witness Protection.
- PPO Schemes.
- MAPPA processes.

Young people for whom the Youth Offending Team has responsibility the potential numbers anticipated to actually fit the criteria for Safe and Secure which would require a move out of Borough are relatively small.

For those Boroughs with known gang issues, a maximum of 10 per annum is anticipated, with most Boroughs not experiencing this level of demand.

**West London Domestic Violence Protocol.**

There are occasions when people who have experienced domestic violence become homeless or at risk of homelessness as a result, and the best course of action is for them to move to another area away from the perpetrator.

A move out of borough is sometimes the most appropriate way forward. Current arrangements, which make out of area moves difficult sometimes, conspire to cause homelessness, and also sometimes lead to people who are fleeing violence needing to make approaches to more than one borough for help. If a fair arrangement can be agreed facilitating appropriate moves between the West London boroughs and Registered Providers, this should prevent homelessness and make the process of a move smoother and less traumatic for people who have experienced violence, as well as streamlining administration and avoiding inter-borough disputes, and disputes between boroughs and Registered Providers.

The circumstances to be considered can be sub-divided into four broad categories:-

- a) The person fleeing domestic violence is a social housing tenant with a secure tenancy in accommodation provided by the Council (or an ALMO).
- b) The person fleeing domestic violence is a social housing tenant with an assured / secure tenancy in accommodation provided by a Registered Providers.
- c) The person who has experienced domestic violence is living in temporary accommodation provided by a local authority.
- d) The person who has experienced domestic violence is in another type of accommodation e.g. private rented and has applied to the local authority as homeless or threatened with homelessness.

In all of the above cases, if it is accepted that the threat of violence is real, there may well be other options to explore before a move out of the borough is considered, e.g. provision of a Sanctuary or a move within the borough.

The West London boroughs have been piloting a reciprocal agreement which covers category a) since August 2005. This agreement revises and extends the scope of that pilot.

Although the following procedure attempts to cover a range of scenarios, no procedure can cover all scenarios, and it is expected that boroughs and Registered Providers will need to negotiate occasional variations to the procedure to deal with individual cases. Such negotiations should however take place within the spirit of cooperation which gives rise to the procedure.

This agreement does not in any way seek to compromise the legal rights of people approaching local authorities in housing need, and the relevant legislation should of course take precedence should any conflict between this agreement and the law emerge in any individual case.

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**Housing Contacts**

<b>Department</b>	<b>Address</b>	<b>Contact</b>
Homeless Prevention & Assessment	Civic Centre Lampton Road Hounslow, TW3 4DN	T: 0208 583 3842
Lettings Team (formally Allocations & Register)	Civic Centre Lampton Road Hounslow, TW3 4DN	T: 0208 583 4422 (option 3 and 5)
Resettlement Team	Civic Centre Lampton Road Hounslow, TW3 4DN	T: 0208 583 3942
Direct Lets & Procurement	Civic Centre Lampton Road Hounslow, TW3 4DN	T: 0208 583 3844
Private Sector Housing	Civic Centre Lampton Road Hounslow, TW3 4DN	T: 0208 583 3870
Hounslow Homes	St Catherine House Feltham	T: 0800 085 6575