COMMUNITY OVERVIEW AND SCRUTINY PANEL

Panel Report

Public

Date of Meeting: **22nd November 2012**

Title: **CUMBRIA CHOICE ALLOCATION POLICY – PROPOSED REVISIONS**

Report of: **The Director of Community Engagement**

Report reference: **CD 56/12**

Summary: This report presents members with an overview of the proposed revisions to the Cumbria Choice allocation policy.

Questions for / input required from Scrutiny:
Scrutiny is asked to comment on the proposed revisions to the Cumbria Choice allocation policy.

Recommendations: It is recommended that Community Overview and Scrutiny Panel consider the report and, as appropriate, provide information to The Executive.

Contact Officer: Keith Gerrard **Ext:** 7350

Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers: None

1. BACKGROUND

All local housing authorities must have an allocation policy for housing, regardless of whether or not they own a housing stock. Carlisle City Council went into partnership with the other five Cumbrian authorities and eight housing associations to develop a joint allocation policy for Cumbria, named Cumbria Choice. The policy came into operation in March 2011. When implemented, it was the intention of the Cumbria Choice partnership to review the policy after 12 months. The review was intended to take into account both the operational issues which have arisen over the last year, and any national trends and reforms such as localism and welfare reform.

2. CONSULTATION

Consultation has involved consideration of the views of all partners, the commissioning of an independent consultant to review equality and diversity considerations, and undertaking consultation with local organisations. The City Council is ensuring that local residents are consulted on the policy revisions. A consultation period on the proposed changes is taking place until 23rd November (tbc) 2012, during which both applicants and stakeholders will be advised of the proposed changes via the Cumbria Choice website and invited to submit any objections and comments.

3. PROPOSED REVISIONS

Following the review process, the partnership board has concluded that allocation policy has predominantly been functioning as anticipated and desired. The 'choice' element of the new allocation policy gives applicants more information about what homes are available and the priority banding required to successfully apply for them. The partnership board does not therefore believe that any wholesale overhaul of the Cumbria Choice allocation policy is required.

However, some changes to the policy are being proposed by the partnership. These changes are being proposed to improve the fairness of the policy, to take into account changes to national policy (in particular changes to the welfare system), or as administrative changes, proposed to address ambiguities or loopholes identified while operating the policy.

A few changes to the priority banding classifications are being proposed in order to improve fairness or to respond to issues arising from national policy reform. These are summarised below:

- Where an existing tenant is both under-occupying and will suffer financial hardship as a result of housing benefit reductions, they will be awarded Band B (High Need for Housing). This is being done to assist such tenants with downsizing to a smaller and more suitable home.
- Where a non-social housing tenant is suffering housing-related financial hardship, they will be offered Band C (Medium Need for Housing). This is to give greater preference to applicants whose current accommodation is unaffordable.
- Band C priority is to be removed from applicants who share bathroom/kitchen facilities with unrelated people, who will now be awarded Band D+/D (Low Need for Housing due to No Reasonable Preference). This is because it was considered unreasonable to prioritise this group over, for example, older children who live at home.

In addition:

- In the future two children of the same sex are only expected to share a bedroom until the age of 16, instead of the current policy's defined age of 21.
- Housing associations will get more freedom to decide what size of property can be let to different sizes of household. The board believes this flexibility is needed to allow housing associations to respond to the changes in housing benefit regulations while taking into account differing types of stock. Individual landlords will need to consult with the local authorities in whose areas they operate about their approach to occupation.
- Customers who have accrued high levels of debt as a result of welfare reform may not be given reduced preference by the allocation policy.

A number of changes to the wording of the allocation policy are needed to address ambiguities and ensure greater consistency of working across the partnership. These changes, as well as the above revisions, can be seen in the amended version of the allocation policy, attached in appendix one.

4. CONSULTATION RECEIVED

The City Council has thus far received the following consultation on the revised allocation policy:

- Cumbria Probation Trust has flagged up that the change of priority (from band C to Band D+/D) for those living in shared accommodation will adversely impact those offenders accommodated at the Bowling Green Approved Premises in Carlisle. The City Council agrees with this feedback, and will look to rectify the policy at the Cumbria Choice board on 29th November, where the final policy will be agreed and taken forward, subject to approval from the Executive.

5. ACCESSIBILITY POLICY

An independent review of Cumbria Choice was undertaken in July 2011 to assess the accessibility of the allocation policy. The review found that some older people and people living in rural areas struggled to access Cumbria Choice. Subsequently a sub-group of the partnership examined these issues and, in response, updated Cumbria Choice's accessibility policy, and added a good practice check list to seek to ensure that all partners followed best practice in making sure Cumbria Choice was accessible to all. The revised accessibility policy is included in appendix two.

6. FINANCIAL IMPLICATIONS

Between 2009/11, the City Council contributed £17,356.16 (8.35%) towards the inception/capital costs of the scheme. Ongoing revenue costs of the scheme have been, and will continue to be, met by the participating housing associations. There should thus be no revenue implications for the City Council approving the revised housing policy.

7. CONCLUSION AND OUTPUTS

Since its launch in May 2011, Cumbria Choice has been operating effectively, has been well received by applicants, and has been a fine example of cross-county partnership working. The proposed revisions to the Cumbria Choice allocation policy will add clarity to the existing policy, and will allow the City Council to respond more effectively to the reforms to the welfare system.

Impact assessments

Does the change have an impact on the following?

Equality Impact Screening	Impact Yes/No?	Is the impact positive or negative?
Does the policy/service impact on the following?		
Age	**Yes**	**Positive**
Disability	**Yes**	**Positive**
Race	**Yes**	**Positive**
Gender/ Transgender	**Yes**	**Positive**
Sexual Orientation	**Yes**	**Positive**
Religion or belief	**Yes**	**Positive**
Human Rights	**Yes**	**Positive**
Health inequalities	**Yes**	**Positive**
Rurality	**Yes**	**Positive**

If you consider there is either no impact or no negative impact, please give reasons:

.....
.....
.....

If an equality Impact is necessary, please contact the P&P team.

APPENDIX 1

Cumbria Choice

Choice Based Lettings

Allocations Policy – August 2012

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Summary of the Scheme

Cumbria Choice is a sub regional scheme for letting most of the social rented property in Cumbria. It is a partnership between the 6 Local Districts and 8 social housing providers.

It is managed through a web based computer system.

To be part of the scheme customers need to apply to the Common Housing Register. There is only one application form and customers will be placed on the register if they meet the eligibility criteria.

Priority for housing is awarded through a 'Banding' system that places people in one of five Bands according to their housing needs.

The majority of properties are advertised and customers are able to exercise choice by registering an interest in the property.

Customers are only able to express an interest in properties that meet their requirements. For example adapted property and some ground floor accommodation will be for customers with medical needs and/or for older persons.

At the end of the advertising period a shortlist is compiled, taking into account: the Band of the customer, the 'effective' date of the application, and any local connection.

Usual practice is that customers at the top of the shortlist are offered the property.

In certain situations exceptions to the policy will apply and these are detailed in the policy. These exceptions, which include 'management discretion' or 'local lettings policies' allow the individual partners to respond appropriately to certain individual housing need and to effectively manage their housing stock. All exceptions to the general policy will be recorded and monitored.

Section 1 Introduction and Background

1.1 Members of the Cumbria Choice Based Letting Partnership

The following are members of the Cumbria Choice based letting partnership, called 'The Cumbria Partnership':

Allerdale Borough Council
Barrow Borough Council
Carlisle City Council
Copeland Borough Council
Eden District Council
South Lakeland District Council

The six Councils have adopted this common Allocation Policy so that customers within the districts covered by the six Councils are assessed on the same basis and have the same access to apply for any social housing vacancies across that whole district.

The scheme applies not only to properties in the Councils' own housing stock (i.e. those owned by any of the Councils if applicable) but also to all those properties to which any of the Councils have rights of nomination (whether by way of a legally enforceable arrangement or not) of the tenant. Properties to which the Councils have rights of nomination of the tenant include properties owned by the following Social Housing Providers:

Accent Housing
Derwent & Solway Housing
Eden Housing
Home Group including Copeland Homes
Impact Housing
Riverside Housing
South Lakes Housing
Two Castles Housing

The participating Social Housing Providers listed above are obliged to advertise vacant properties in accordance with this policy. In addition all of the Social Housing providers listed above have adopted the Council's allocation policy so that there is a common allocation policy ensuring that applicants within the Sub Region who apply to the Council or a participating Social Housing Provider are assessed on the same basis and have access to apply for any vacancies either within their district and to a percentage across the Sub Region.

The scheme formally applies to all properties to which Allerdale Borough Council, Barrow Borough Council, Carlisle City Council, Copeland Borough Council, Eden District Council and South Lakeland District Council have rights

of nomination (whether by way of a legally enforceable arrangement or not) of the tenant. Properties to which the Council have rights of nomination of the tenant include properties owned by Accent Housing, Derwent & Solway Housing, Eden Housing, Home Group including Copeland Homes, Impact Housing, Riverside and Two Castles Housing. The participating Social Housing Providers are obliged to advertise vacant properties in accordance with this policy. Separately, participating partner Social Housing Providers to the Cumbria scheme have voluntarily agreed to allocate the majority of their properties that are not subject to a formal nominations agreement under the joint policy agreed by the six Local Authorities.

To improve the service to customers and to avoid duplication a customer can apply to any of the participating housing organisations listed above. Where this organisation is not a Local Authority that organisation will be assessing the applicant under the Allocation Policy of the relevant Local Authority for that area and on behalf of that Local Authority. This will remove the need for a customer to be redirected back to the Council to register under the Council's allocation scheme directly.

Any significant changes to this policy will need to be approved by the full Council for each participating Local Authority. The relevant decision-making bodies of the Social Housing Providers, namely the Board, will also need to consider and endorse any changes that the Local Authorities wish to make to the policy. Any changes will also be subject to consultation with relevant statutory and voluntary sector organisations and tenant representatives.

- ❖ Contact details for all partners are listed in Appendix 2.

In developing this policy the partnership has referred to the following guidance and housing legislation:

- The Housing Act 1996 and the Homelessness Act 2002
- Office of the Deputy Prime Minister: Allocation of Accommodation - Code of Guidance For Local Housing Authorities. November 2002
- Department for Communities and Local Government: Allocation of Accommodation: Choice Based Lettings - Code of Guidance for Local Authorities 2008
- Department for Communities and Local Government: Fair and Flexible statutory guidance on social housing allocations for local authorities in England December 2009
- Department of Health: Housing Learning and Improvement Network – The impact of Choice Based Lettings on the access of vulnerable adults to social housing 2009
- Department for Communities and Local Government Circular 04/2009: Housing allocations – members of the armed forces
- Audit Commission: Housing Inspectorate Key Lines of Enquiry – Allocations and Lettings
- Homelessness Code of Guidance for Local Authorities 2006.

Equality legislation and guidance

The partnership will ensure that its policy complies with the current equality legislation and with the relevant statutory codes and guidance.

The operation of the policy has been subject to an Equality Audit and this will be regularly reviewed.

1.2 Policy Statement

Cumbria Choice is the main route into social housing for the majority of people seeking such housing in Cumbria. This policy will aim to treat those applying to the scheme fairly; will be inclusive of all groups and the procedure will be transparent.

Cumbria Choice will provide greater choice for applicants but the demand for housing will continue to be greater than the supply. However through good quality feedback to customers the scheme will enable people to be clear about their prospects of being offered accommodation.

For people unlikely to be offered accommodation through the scheme there will be advice about alternative housing options. There will be information on the website and in written material on options such as; mutual exchanges, the private rented sector, low cost home ownership and shared ownership properties.

The partnership intends the allocation policy to have a positive effect on local communities by increasing tenant satisfaction with their housing, and by contributing to the development of stable communities. The partnership aims to provide a high quality service to its customers and intends to work together to continue to develop the scheme to find joint solutions to housing problems, including those of homelessness.

The partnership acknowledges that some customers applying to the scheme will not be eligible to register for housing due to previous unacceptable behaviour, such as anti-social behaviour. The policy aims to be open and transparent as to the reasons for exclusions and gives advice on the possible actions a customer can take to subsequently gain acceptance onto the register.

Partners are committed to developing a common lettings approach that is easily understood by customers. However, the partnership recognises the need for different approaches to apply in different areas which meet the particular needs of these areas and the needs and objectives of different organisations. Local lettings policies and approaches are therefore accommodated within the policy. Where a specific policy or process applies it will be covered by a written document and made available by the organisation operating the policy/process.

Additionally, each individual provider will have its own approach to tackling welfare reform. For example, different approaches will be taken for dealing with under-occupation. These approaches will be published in parallel with, but separate from, this allocation policy.

1.3 Aims of the Scheme

In developing this policy the Partnership has agreed the following aims:

To reduce the use of temporary accommodation for homeless applicants and to assist with prevention by making customers aware of their potential housing choices and the alternative options available to them eg. private sector, low cost home ownership.

To increase the availability of move-on accommodation to prevent 'blockages' in supported housing schemes.

To ensure a lettings service that embraces equality and diversity by being open and fully accessible to all individuals and to provide support to more vulnerable customers where required.

To improve the means by which local people in Cumbria gain access to social rented housing by providing a modern and easy to understand allocation system which allows choice and is fair, transparent and accountable.

To encourage residents to access employment and to recognise residents who make a contribution to a local community.

To make the best use of the housing stock within the scheme.

To increase mobility by making available 10% of all properties to customers across Cumbria. To increase opportunities for tenant mobility between Cumbria and other areas of the country.

To attract new customers to areas of low demand and reduce void times on 'hard to let' properties.

1.4 Statement on Choice

The key underlying principle of the scheme is to give choice to customers who are looking to obtain housing in the social rented sector.

To ensure customers have choice the partnership will advertise the majority of its properties on a weekly basis through this scheme; property adverts will appear on its website and in newsletters available in the offices of all partner

organisations and other appropriate sites to assist the public to access the scheme.

The Partnership will endeavour to ensure that property adverts are easy to read and will include information about the local area to allow customers to make the best informed choice about housing that is suitable for their needs.

It is the Cumbria Choice policy that wherever possible customers wanting social housing should be able to choose the property for which they wish to be considered. There will be some instances, in exceptional circumstances where the only way to resolve a person's housing situation is through the use of management discretion e.g. homeless households to whom there is a statutory duty to house; households at risk of violence. (See section 3.3: Management Discretion). In certain circumstances choice may be limited.

1.5 The Partnership

Cumbria Choice is managed by the Sub Regional Project Board which is governed by a 'partnership agreement'. Its members consist of one senior officer representative from each organisation within the partnership and two tenant representatives. Each organisation has one vote within the partnership. Tenant representation has one vote within the partnership.

The Project Board will meet at least six times a year to oversee the running of the scheme and to monitor its compliance with local and national policy and guidance. The partnership will continue to monitor, fund, develop and make policy decisions about the scheme as appropriate.

1.6 Equality and Diversity

Cumbria Choice is committed to ensuring that its policy and procedures in the letting of property is non-discriminatory. This includes promoting equality of access to the service.

The Partnership is committed to assisting all customers to access the service, taking account of vulnerability or other specific needs, and also the needs of different ethnic groups.

To identify the needs of our customers the application form will have specific questions relating to vulnerability, ethnic origin, sexual orientation, disabilities etc. This information will be used to monitor the impact of the policy on minority and specific needs groups and to make such amendments as may be required to ensure no group is disadvantaged by the policy.

1.7 Accessibility

The partnership recognises that a choice based letting scheme requires active participation by the customer which some may find difficult.

Local support groups and voluntary and statutory agencies have been involved in the development of this scheme to ensure that it is as accessible as possible to all groups within the community. The partnership will continue to work with these agencies to improve accessibility to the scheme.

Those needing support, advice or assistance will be identified through information given on the application form and also by staff, other professional and voluntary groups, and also the computer system which can be used to monitor whether some customers are not 'bidding' or are making inappropriate 'bids' (expressions of interest).

The Partnership will continue to try to ensure that the system is as accessible as possible to any applicant who wants to use it. Easy to read guides explaining how the scheme works will be sent to all customers when they request an application form and once they are registered. All forms and guides will be available on request in other formats and languages.

The Partnership will continue to widely publicise the scheme and will ensure that newsletters advertising the properties are widely distributed.

The Partnership has ensured that its own staff are fully trained and able to offer advice and assistance to individual customers through; front line staff, floating support workers, hostel staff and sheltered housing wardens.

Through ongoing liaison with a range of statutory and voluntary agencies, the partnership aims to ensure that high quality support is available to customers.

The ICT system will be used to monitor customer bidding patterns and will be used to identify those who are having difficulty using the system. In addition the outcomes for customers identified as having specific needs or coming from minority groups will be monitored to ensure they are as successful in gaining housing as other customers.

In exceptional circumstances 'automatic bidding' (see Appendix 1 definition of terms) will be available – this is not a preferred option as it reduces customer choice.

An Accessibility Policy accompanies the Cumbria Choice Scheme.

1.8 Monitoring

The partnership will continue to monitor the policy to ensure that its aims are being met.

Monitoring will be used to ensure that:

- Those in the ‘reasonable preference’ categories are given priority for housing (see sections 3 and 4)
- Lettings are broadly proportionate to the profile of local communities
- Lettings within ‘the Bands’ accords with the stated aims of the policy (see section 3)
- Customers in special needs groups are successfully accessing housing.
- There is overall customer satisfaction with the scheme.

1.9 Information sharing, confidentiality and data protection

Information received by a partner organisation in relation to a customers registration form will be treated in confidence in accordance with the Data Protection Act 1998.

Confidential Information held about customers will not be disclosed to third parties apart from:

- Where the individual has consented to the disclosure
- Where a partner organisation is required by law to make such a disclosure.
- Where disclosure is made in accordance with a recognised Information Sharing Protocol or for reasons of public protection.

Partner organisations will continue to develop Information Sharing Protocols within their own areas and where possible across Cumbria to enable consistency and good working practices between the partnership and other voluntary and statutory agencies.

Local Authorities have a duty under the freedom of Information Act with which they will comply. This duty does not apply to registered social housing providers.

Section 2 The Common Housing Register

The Partnership has agreed to operate one common housing register within the scheme. This is a single register for both new customers applying for property and existing tenants wanting a transfer. The single register enables customers applying to the scheme to access housing owned by each member of the Partnership by completing just one application form.

When shortlisting for properties priority will usually be given to customers with a local connection to the Local Authority area. However, there is a commitment to make 10% of vacancies available across the Sub Region without the requirement for a local connection to the Local Authority area in which the property is advertised. (see section 5.9 for definition of local connection)

2.1 Who can Apply

1. Anyone over 16 years – UNLESS:
    i. They are a person from abroad and have been classed by the Secretary of State for Communities and Local Government as ineligible for housing.
    ii. They or a member of their household is guilty of unacceptable behaviour serious enough to make them an unsuitable tenant.

2. Open Register: Cumbria Choice operates an open register and will accept all people regardless of their housing need or whether they are from outside Cumbria, subject to them meeting the eligibility criteria.

3. Joint Applicants: joint applications will be accepted and will be treated as one application. An applicant can only have one active application as a main applicant on the register. The housing need of the full household will be considered in assessing housing need. This Allocations Policy supports adult customers wishing to sign as joint tenants should they choose to do so.

In relation to social housing providers the individual housing provider will decide whether to allow a joint tenancy depending on the circumstances of the case.

4. Employees or their relatives: those working for, or elected to the Governing Body of a partner organisation, or, those related to such a person will be eligible to apply. Any offer of accommodation will be subject to the approval of the Governing Body of the organisation offering the property.

5. Owner Occupiers (and those with the financial means to purchase property):

    - These customers can register with the scheme and will be assessed and placed in the appropriate 'Banding' subject to an assessment of their financial means and ability to purchase suitable accommodation. The decision will be based on a case by case basis based on housing need and the local housing market. If assessed as able to purchase suitable accommodation they will be given reduced preference.

6. 16/17 year olds: young people aged 16/17 years will be able to apply for accommodation by completing a registration form. However a Social Landlord will not normally grant a tenancy to anyone under the age of 18 years without evidence of an appropriate support package being in place.
The following are examples of when a person under 18 years will be considered for accommodation:
    - They are accepted as requiring move-on accommodation following a successful period in a recognised supported housing scheme and have a move-on support package.
    - They are a homeless young person to whom a duty is owed under Part VII, Housing Act 1996 and a full housing and child in need assessment has been made by Children's Services.
    - They are referred by Children's Services following a housing and child in need assessment with a recommendation for housing having been made. This includes children leaving care.

7. Tenants of social housing organisations

    - Secure and assured tenants may apply to the Register at any time and will have their priority assessed in the same way as other customers.
    - Tenants with probationary or starter tenancies will be given reduced preference until the completion of the 12 months probationary period and a secure or assured tenancy has been granted. However this may not be applied if there is an urgent need for re-housing.

- Tenants transferring within the Scheme will need to have a clear rent account and a satisfactory property report. However this may not necessarily be required if there is an urgent need for re-housing.

8. Persons from Abroad

- Housing authorities are required by law to establish if a person is eligible for housing or whether they are excluded from an allocation under the Asylum and Immigration Act 2002.
- Where a person's eligibility for housing is unclear investigations will be undertaken to establish the person's entitlement for housing.

9. Prisoners: prisoners can register in the 6 month period prior to their date of release. They are able to express an interest in a property in the 2 week period prior to release but must be able to accept the tenancy on the date required by the housing provider.

Partner organisations will refer to the Cumbria Joint Protocol for Housing Offenders for guidance.

10. Serious unacceptable behaviour

- Cumbria Choice expects customers registering for housing to be able to meet the standards of behaviour required of them by the tenancy agreements of partner organisations. Where customers current behaviour indicates that they would be unsuitable to be a tenant they will not be eligible to register with the scheme.
- Part 6 of the Housing Act 1996 as amended by the Homelessness Act 2002 (Section 160A (7)) allows the Local Authority to treat a person as ineligible where they or a member of their household has been guilty of behaviour serious enough to make him/her unsuitable to be a tenant and at the time of the application the customer is still unsuitable to be a tenant.
- Unacceptable behaviour includes but is not limited to:
    - Anti-social behaviour
    - Racial harassment and other hate related crimes
    - Criminal Behaviour
    - Violence
    - Violence or threats of violence to staff or the agents of partner organisations in the Cumbria Choice scheme
    - Serious rent arrears
- The decision on whether a customer is deemed to be ineligible will be made on a case by case basis.
- Where a customer is deemed to be ineligible to join the register they will be given the reasons for that decision and will have the right to request a review of that decision (Section 6).

- Ineligible applications will remain so for a period of 12-months following the date of the decision and customers will need to reapply for housing after this time. The only exception to this is where a previous arrear has been fully cleared. Applicants can re-apply as soon as debts are repaid.

    - ❖ The full policy on the Eligibility criteria is listed in Appendix 3.

11. Households with access to children/joint custody
    - Children will only be considered at their main place of residence.
    - Customers wishing to include children in their application must be able to provide formal evidence that each child will live with the customer, for example through child benefit entitlement, residency order or custody agreement.

2.2 How to Apply

To join the Cumbria Choice Register customers need to complete an application form. The form can be obtained from the offices of any partner organisation or completed on line via the website.

The application form will be available in other formats and languages on request.

Customers will be required to sign a declaration to:

- Confirm that the information given is correct and that they will notify Cumbria Choice of any change in their circumstances.
- Give consent to allow enquiries to be made concerning their eligibility for housing and level of priority.
- Give consent to allow information to be provided to another partner organisation in the scheme.

Assistance is available for any customer who has difficulty in completing the form from any of the partner organisations

2.3 References

Existing or previous tenants will be asked to provide a reference from their current or previous landlord. This information will be used to decide whether the customer is eligible to be accepted onto the Register and whether or not they should be given reduced preference.

Where a customer has not held a tenancy a character reference may be requested from a professional person who has known the customer for at least 2 years. This applies to both customers where there is a joint application.

Where a customer cannot provide a reference then the following options may be taken to establish whether a customer is eligible to be accepted onto the register and whether or not they should be given reduced preference:

- The customer will be asked to attend an interview with the Officer responsible for assessing the application.
- Information may be sought from the Police through the information sharing protocol.

2.4 Police Checks

Where a customer indicates on their form that they have an unspent criminal conviction a criminal records bureau check or further information will be sought about the offence(s). This will be done to establish whether the person has been involved in a serious crime(s) that would pose a serious risk to the community if they were to be housed within that community.

Information gained will not automatically exclude an applicant from the register. It may also be used to make informed decisions about any offer of a property.

2.5 Notification of Registration

When an application is accepted onto the register the customer will be informed in writing and provided with the following information:

- Their registration date
- Their registration reference number
- The Band they have been placed in.
- A Priority Band date if that is different from their date of registration (see section 3.2; the 'effective' date)
- An explanation of the login reference number and memorable date for use when logging into their online account

If an application is moved into a higher priority Band the 'effective date' is taken to be the date it was moved into the higher priority Band. Where an application is moved out of a priority Band the waiting time reverts to the original date of registration.

When customers receive their letter of registration they will also receive a guide to the Cumbria Choice Scheme. This will inform them about how the scheme works and will include such information as: how applications are Banded; where to look for advertised properties; how to register an interest in a property, 'bid'; what checks are made before an offer is confirmed.

2.6 Changes in Circumstances

It is the responsibility of the customer to notify Cumbria Choice of any changes in their circumstances that could affect their application for housing. The application will be re-assessed and if appropriate placed in a different Band.

2.7 Reviewing the Register

Each customer on the Common Housing Register will have their application reviewed annually. A letter will be sent to all customers requesting confirmation of details. If a reply is not received within 28 days of the date sent the application will be cancelled.

Customers registered in Bands A and B will be reviewed more regularly to ensure they are bidding for suitable properties. Monitoring of number(s) of 'bids' made (or lack of) will be used to identify where assistance to customers may be needed

2.8 Cancelling Applications

An application will be cancelled from the housing register in the following circumstances:

i. At the customers request.
ii. If the customer becomes ineligible for housing on grounds of their behaviour.
iii. When the customer has been housed.
iv. When a social housing tenant completes a mutual exchange.
v. On failure to reply to a review letter or requests for further information within a given time period.
vi. Where it is discovered that the customer has given false or misleading information

In circumstances (ii) and (vi) the customer will be notified in writing and informed of the reason why their registration has been cancelled and of their right to request a review of that decision.

In circumstance (v) the customer will be notified in writing that their registration has been cancelled. The application will be re-instated if the applicant contacts Cumbria Choice within 28 days of being notified of the cancellation.

2.9 Giving False Information

Under section 171 of the 1996 Housing Act it is a criminal offence for anyone applying for housing from a housing authority to knowingly give false

information or to withhold information which is relevant to their application. An offence is also committed if a person allows a third party to provide false information on their behalf.

Customers who are found to have withheld or given false information may be removed from the register for 12 months. This will be decided upon based on the seriousness of the false information given and an assessment of why the information was withheld.

The customer will be informed in writing of the decision and advised of their right to request a review.

Where a tenancy has been awarded action may be taken with regard to that tenancy.

2.10 Deliberate Worsening of Circumstances

Where there is evidence that a customer has deliberately made their housing situation worse in order to gain a higher priority on the register, they will be assessed based on the circumstances before their situation changed.

Examples of this are:

- Customers who have allowed family members or others to move into their property, who previously had suitable accommodation or the financial means to secure their own accommodation, and this has resulted in the property being overcrowded.
- Customers who have moved from previously suitable or more suitable accommodation which it was reasonable for them to continue to occupy, into a less suitable property.
- Homeowners who have transferred their property to another family member within the last 5 years from the date they make their application to the Register.

Section 3 Assessing Housing Need

Priority for Housing

Local Authorities are required by law to determine the relative priority that housing customers are awarded. The law, as it applies to Local Authorities, requires that reasonable preference for housing must be given to those in the categories set out in the Housing Act 1996 (as amended). In addition the Cumbria Choice scheme gives additional preference to those customers where the Council is satisfied that they have other exceptional or urgent housing needs.

Cumbria Choice operates a needs based Banding system which is set out below. The Bands are arranged to reflect housing need with the highest Band, Band A, indicating the greatest need for housing.

Band A: Urgent Need for Housing due to Reasonable preference plus additional priority.	Explanation of criteria to be used in the Assessment
Homeless Households owed a full homeless duty. Reasonable preference category s 167(2) (b)	Households who have made a statutory homeless application to the Local Authority under Part V11 of the Housing Act 1996 and have been determined by the Council as owed a homelessness duty. Note: Local Band A will be awarded unless the household also meets the criteria for Exceptional need to move (see below)
Exceptional need to move due to a Medical condition or reasons of Disability Reasonable preference category s167(2) (d)	• An immediate life threatening condition which is seriously affected by the current housing circumstances. • A member of the household cannot be discharged from hospital until a suitable adapted property is provided. • Due to an assessed limited mobility a person in the household is unable to access essential parts of the property eg. bathroom/toilet and the property cannot be suitably adapted. • A member of the household is elderly or disabled or has a progressive illness and is

	likely to require admission to hospital or residential/nursing care in the immediate future and re-housing would enable the person to remain at home. • Armed forces personnel who need to move to suitable adapted accommodation because of a serious injury, medical condition or disability which he or she or a member of their household, has sustained as a result of service. People who have a severe mental health or learning disability which significantly affects their ability to lead a normal life and which puts them at risk of admission to hospital or residential care.
Exceptional need to move. Reasonable preference category s167(2) (d)	Customers who need to move due to domestic abuse, extreme violence or extreme harassment. This would include racial, homophobic or transgender harassment. This will only be agreed in exceptional circumstances where there is a high risk to the tenant or their family's safety if they remain in the property/area and the location sought would substantially reduce or eliminate the risk. Clients in this group should be awarded global Band A without a local connection restriction (other than when this is required by s106 agreement)
Excessive Overcrowding Reasonable preference category s167(2) (c)	Households living in conditions which are prejudicial to health and where there is a high risk of harm, as assessed using the Housing Health and Rating system. The assessment must be made by the Local Authority.
Property Condition Reasonable preference category s167(2) (c)	Households living in conditions which give rise to an imminent risk of harm and where the Local Authority has served a Prohibition Order under Part 1 of the 2004 Housing Act.
Band B: High Need for Housing due to Reasonable	Explanation of criteria to be used in the Assessment

Preference	
Cumulative Preference Combinations of reasonable preference categories s167(2) (c), (d) & (e)	People who are assessed as having more than one reasonable preference housing need from reasonable preference category (c), (d) & (e). Customers who have two or more of the following needs as listed in Band C: • Households needing to move to a particular locality on hardship grounds • Households overcrowded/under occupying • Disrepair - households where a Category 1 hazard has been identified by the Local Authority (NB see full definition of disrepair under "Property condition in Band C") • Medical need • Existing social housing tenants who suffer financial hardship as a result of housing benefit changes under Welfare Reform.
Welfare Grounds Reasonable preference category s167(2) (d)	• People who are living in a supported housing placement within the partnership area (usually for for at least 6 months) and who have been assessed as being ready for independent living. • Young people who are referred by Cumbria Children's services following a s17 assessment under the Children Act 1989 with a recommendation for housing. This includes children leaving care. • All referrals by Children's Services will be made following the Joint Protocol – currently the Interim Protocol 16-17 year old presentations in relation to accommodation (March 2010) in Cumbria NB. It is expected that a support plan will have been prepared and will be available to the housing provider for people rehoused on these grounds.
Homeless prevention status – customers who have not been housed within 3 months of being awarded Band C priority	A customer has children or is pregnant, or is a single person who in the Local Authority's opinion may be in priority need and the Local Authority considers they are at risk of being physically homeless. The customer must have opted to take a homeless prevention option and as a result have been granted Homeless Prevention Status. This priority will be awarded by the Local Authority

	after the 3 month period that the customer has been in Band C.
Under occupation Reasonable preference category s167(2) (c)	Social housing tenants of a partner organisation that are under occupying a house by 2 or more bedrooms who bid on properties with at least 2 fewer bedrooms than they currently have. An assessment will be made on the basis of the current family composition and will also take into account the family composition at the start of the tenancy.
Band C: Medium Need for Housing due to Reasonable Preference	**Explanation of criteria to be used in the Assessment**
Non Priority Homeless Those who are entitled to reasonable preference as being non-priority homeless, intentional homeless or homeless within Part 7 of the Act. Reasonable preference category s167(2) (a) Homeless in priority need and intentional pending S202 Review	These customers will be assessed by the Local Authority. They will include: • Rough sleepers • Those moving between friends and relatives • Those who have accommodation but the local authority do not consider it reasonable to occupy • Those who have accommodation, but cannot secure access to it or there is no lawful place they can live in it e.g. caravan Those who have made a homeless application and determined to be homeless but not in priority need or are intentionally homeless or have no local connection. (NB Band E may apply to intentionally homeless applicants where there is a clear reduced preference as defined in the policy ie. Arrears / anti-social behaviour)
Homeless prevention option being chosen Priority will be awarded for a 3 month period	A customer has children or is pregnant, or is a single person who in the Local Authority's opinion may be in priority need and the Local Authority considers they are at risk of being physically homeless. The customer must have opted to take a homeless prevention option and as a result have been granted Homeless Prevention Status. This priority will be awarded by the Local Authority for a period of 3 months.
Medical	The customer's housing is unsuitable for medical/disability reasons but they are not

Reasonable preference category s167(2) (d)	housebound and their life is not at risk due to their current housing. However the housing conditions are directly contributing to their ill health. Examples are as follows: • Children with severe conditions such as autism, or cerebral palsy where their long term needs cannot be met without settled accommodation • A person whose disability means that re-housing would enable them to overcome physical barriers created by their current accommodation e.g. stairs and steps. • A person with a disability requiring substantial adaptations where their current accommodation cannot be economically adapted to meet their needs after consultation with the relevant Local Authority • A person with a terminal illness or long term medical 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. The assessment will not be made on the basis of the customer's health but on how their accommodation affects their health.
Hardship Reasonable preference category s167(2) (e)	Customers who need to move to a particular locality where failure to meet that need would cause hardship to themselves or others. This would include people needing to move for: • Employment purposes • To be near relatives to give or receive support • To access medical treatment/social services facilities. This priority will only be awarded in exceptional circumstances and includes: • Customers who require support from relatives or friends will only be considered where there is a severe mental health, medical or welfare issue and there are reasons why this support cannot be made

	available through reliance on public transport or the customer's own transport. • Customers requiring to take up or continue employment opportunity not available elsewhere will only be considered where they do not live within a reasonable commuting distance and will be required to provide confirmation of employment details from the employer. • Non social housing customers who are assessed as facing housing related financial hardship where re-housing through Cumbria Choice will alleviate the situation. • Existing social housing tenants who suffer financial hardship as a result of housing benefit changes under Welfare Reform.
Overcrowded Reasonable preference category s167(2) (c)	Customers who need to move due to overcrowding by 1 bedroom or more. Applicants will be assessed according to the Cumbria Choice policy for overcrowding (see s 4.3) A household will be considered for this category where they are 1 bedroom or more short of the required bedrooms.
Property Condition Reasonable preference category s176 (2) (c)	Households where there is one or more category 1 hazard as assessed under the Housing Health and Safety Rating System (HSSRS) as defined under Part 1 of the Housing Act 2004. This will mean where a Category 1 hazard has been identified by the Local Authority and the Local authority is working with the landlord to resolve the problem or taking enforcement action.
Under Occupation Reasonable preference category s167(2) (c)	Social housing tenants of a partner organisation that are under occupying a house by 1 bedroom who bid on properties with 1 less bedroom than they currently have An assessment will be made on the basis of the current family composition and will also take into

	account the family composition at the start of the tenancy.
Band D: Low Need for Housing due to No Reasonable Preference	Explanation of criteria to be used in the Assessment
Band D Plus Customers not owed a reasonable preference but who have met the Partnership Community Contribution criteria	Those in Band D Plus will be given priority over other customers in Band D. To qualify for this Band applicants need to demonstrate: • Employment • Transfer customers of partner organisations with a positive tenancy history. • A positive contribution to the local community – for example voluntary work.
Band D Customers not owed a reasonable preference	Customers assessed as not being owed a reasonable preference. This would include those who are assessed as adequately housed.
Band E: Reduced Priority	Explanation of criteria to be used in the Assessment
Customers owed a reasonable preference but given reduced priority Customers not owed a reasonable preference and given a reduced priority	• Customers will be awarded the reasonable preference that their assessed housing needs warrant but will be given reduced priority until action is taken by them to rectify their circumstances/behaviour. • These customers will remain in this Band until action is taken by them to rectify the circumstances/behaviour that has led to the reduced priority. A customer will be given reduced priority for the following reasons: • Arrears or other housing related debt • Breach of a tenancy condition which is unresolved but would not warrant a full possession order • A property not meeting the required standard for a transfer customer • No local connection • those with financial resources • Refusing 2 reasonable offers within a 12

	month period • Young people less than 18 years of age unless they meet the criteria for being offered accommodation. • Tenants with starter or probationary tenancies

❖ See Section 4 for detail on how reasonable preference, additional preference and reduced priority will be assessed and applied under the scheme.

3.2 Waiting Time – The 'Effective' Date

Priority is given to customers depending on their housing need but significant importance is also given to the length of time the customer has waited for a property. Priority within each Band is determined by the length of time the application has been placed in that Band. This is either the date of registration or the date of entry into a priority Band.

Where a customer moves out of a priority Band and into Band D or E their effective date will return to their date of registration.

3.3 Management Discretion

In some circumstances a property will be let directly to a customer without being advertised. This is when: a sensitive letting is required due to the person's previous history; where there is an urgent need for housing and it would cause serious hardship or risk to the customer if they were required to 'bid' for a property; there is a need to make best use of the housing stock or for other housing management reasons.

This is not an exhaustive list but examples of these instances are:

- Tenants of partner organisations that need to move on a temporary basis due to a fire or flood.
- People who are at imminent risk of violence and are to be housed through a witness protection programme.
- Vulnerable people who are to be housed as part of a multi-agency protocol where a full support package is in place.
- Where an existing social housing tenant is required to move to make best use of stock and suitable accommodation has not been secured through the Scheme e.g. to make available a fully adapted property, urgently required by a priority customer.
- Where there is a need agreed between housing and social services to provide a specific property for vulnerable individuals. For example

where a property is required for people with learning disabilities to live together with support.

- Where a sensitive letting is required for a particular property because of previous issues of drug dealing, violence, public protection or anti-social behaviour.
- Tenants of partner organisations participating in a recognised down-sizing scheme.

When an allocation is made through management discretion this information will be included in the lettings results which are published.

3.4 Homeless Households

Homeless applications will continue to be dealt with by the appropriate Local Authority in accordance with the relevant legislation and codes of guidance -. this includes dealing with appeals and reviews. Information regarding homelessness will be provided to homeless applicants by the Local Authority (or Local Authority agent).

However a key aim of the Cumbria Choice scheme is to address the issues of homelessness within the County and through the partnership to provide an improved service to those either homeless or threatened with homeless.

This will be achieved through sharing good practice and developing initiatives across the partnership. Through the use and development of improved ICT systems homeless households will be able to identify the housing options available to them and to have an informed view of how they can best resolve their housing needs.

Homeless households and those threatened with homelessness will have greater control and choice over where they live and through assisting them with these decisions the scheme aims to increase their commitment to both the home and the community into which they move.

Households who are found homeless or at risk of homelessness, in priority need and are unintentionally homeless, and, to whom a Local Authority has a duty under Part VII of the 1996 Housing Act will be placed in Band A. However some Local Authorities in Cumbria may also chose to use the provisions of the Localism Act 2011 to discharge their duty into a 12 month Assured Shorthold Tenancy (AST) in the private sector.

These households will be able to bid for properties during a 6 week period. During this time the bidding pattern of such customers will be monitored to ensure that they are bidding and to identify those who are in need of further advice and assistance to help them through the process.

After the 6 week period, partner organisations have the right to place a bid on behalf of the homeless household. Where the bid is successful it will constitute an offer of accommodation in accordance with section 193(7) and

202 of the 1996 Housing Act. The offer will be made in writing and subject to appeal.

The homelessness duty will be discharged if an offer is made as a result of a successful bid on a suitable property.

Customers who have been found intentionally homeless may be given reduced preference by virtue of the action which led to the intentional homeless decision and placed in Band E. Customers to whom a Local Authority has a duty under Part VII of the 1996 Housing Act will be given reduced preference and placed in Band E where they do not have a local connection to the Local Authority. Customers will remain in this Band until the issues relevant to their circumstances have been resolved.

3.5 Households with a Disability

The scheme enables customers who require adaptations to 'bid' for any property in the scheme. The customer will be considered for the property on the same basis as the other applicants who have placed 'bids'. However, there is an expectation that applicants awarded a priority band on medical grounds will bid for properties suitable to their needs or that the landlord considers the property reasonably capable of being adapted at reasonable cost. Where a property does not meet the needs of the applicant the medical priority awarded may be withdrawn for that property

Adapted properties or properties designed to disability standards are included within the scheme and will be offered firstly to those customers with a need for this property type. This will be made clear in the advert as well as information within the advert about the actual adaptations/accessible features.

3.6 Serious offenders and Public Protection

Cumbria Choice will work with the Police and Probation Service through the Housing Offenders Protocol to manage any risk posed to the public.

Officers will attend case conferences and work with agencies where cases are referred to the Multi-Agency Public Protection Panel. A range of housing options will need to be considered and the partnership will seek to assist in identifying appropriate housing that meets the needs of the customer and the community.

In some circumstances this may restrict the choice of property available to the customer but they will wherever possible be given the opportunity to exercise some choice.

3.7 Exempt allocations

Some transfer moves are exempt from the requirements of Part 6 of the Housing Act 1996 and will be dealt with separately.

The following are not allocations under this scheme:

- 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 tenant's death, or
- Transfer of the tenancy by a court order under family law provisions or under the Civil Partnership Act 2004, or
- The Conversion of an Introductory Tenancy (Council stock), or Starter Tenancy (Housing Association stock) into a Secure Tenancy.
- Council initiated transfers, for example due to a tenant being displaced from their accommodation due to demolition or regeneration.
- Re-housing due to being displaced from previous accommodation by the Council pursuant to the land Compensation Act 1973.
- A person granted a family intervention tenancy.
- Provision of non secure temporary accommodation in discharge of any homelessness duty or power.

Section 4 Reasonable Preference Categories, Community Contribution and Reduced Preference

The law requires Local Authorities to give reasonable preference for housing to certain categories of households. The statutory reasonable preferences categories are set out in section 167(2) (a) to (e) of the Housing Act 1996 (as amended) and are:

- People who are homeless, as defined by Section 175 Part VII of the 1996 Housing Act.
- People who are owed a duty by any local authority under section 190(2), 193(2), or 195(2) of the Housing Act 1996 or under S65(2) or S68(2) of the Housing Act 1985 or people that are occupying a property secured by the local authority under Section 192(3) of the Housing Act 1996 (persons not in priority need who are not intentionally homeless)
- People occupying unsanitary 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 housing authority, where failure to meet that need would cause hardship to themselves or others.

In framing this policy and to ensure that those in greatest need are given preference for an allocation of accommodation, the partnership has taken into account the categories of people that must be given reasonable preference by Local Authorities.

Whilst Housing Authorities are required to give reasonable preference to the above groups they will not necessarily be given the same degree of preference. Housing Authorities are able to give additional preference in their allocation policy to households who have a particular urgent need for housing.

To ensure allocation policies meet local housing needs housing authorities are also able to give priority to other groups who are outside these reasonable preference categories as long as they do not dominate the scheme at the expense of those listed in the reasonable preference categories.

Reasonable Preference and Additional Preference – How it is Applied Under this Scheme.

4.1 Reasonable preference category s167(2) (a) – people who are homeless within the meaning of Part VII of the Housing Act 1996.

- Customers assessed as meeting the criteria for this reasonable preference category will be placed in Band C.
- Households at risk of homelessness and whom the Local Authority considers may be in priority need will be placed in Band C where they have opted to take a Homeless Prevention option. Those who are awarded this status may move to Band B after 3 months.

Customers in this category do not need to have made a homeless application to a Local Authority however they do need to have had a Housing Options Interview. They do not need to be in 'priority need' for accommodation as defined by Part VII of the 1996 Housing Act. This definition of homeless includes a person who does not have accommodation which is legally and physically available to them or has accommodation but it is not reasonable for them to continue to occupy.

Examples of where a customer may qualify under this category for Band C are:

- Rough Sleepers
- Those moving between friends and relatives
- Those who have no accommodation at all in which they can live, with other family members normally living with them or others the Council might reasonably expect to live with them.
- Those who have accommodation but where there legal right to live in that accommodation has been terminated and they will be homeless immediately or within 28 days.
- Those who have accommodation but where in the Council's opinion it wouldn't be reasonable for them to continue to occupy it.

- Those who have accommodation but cannot secure access to it, or, in the case of a moveable structure, like a caravan, there is no lawful place they can lawfully live in it.
- Those who have made a homelessness application and have been determined by the Council to be homeless but not in priority need, or have been found intentionally homeless or have no local connection.

Note: those found intentionally homeless may be given reduced preference or be made ineligible by virtue of the action which led to the intentional homeless decision where there is a clear reduced preference as defined in the policy ie. rent arrears / anti-social behaviour.

Homeless Prevention

The Local Authority will award additional preference to those at risk of homelessness where the customer has chosen to take a homeless prevention option, in the following circumstances:

- The customer is likely to be found to be in priority need if they became homeless and made a homeless application

- And, the Council consider that they are at risk of being homeless (within 28 days)

- And, they have opted to take a homeless prevention option offered by the Council and as a result have been granted Homeless Prevention Status

These households will be placed in Band C for up to 3 months. The Council may then award Band B after the 3 month period. The customers 'effective date' will be the date that they moved into the respective Bands. Banding in this category will apply only in the Local Authority area where the decision has been made. (Local Band only). At no point should the local band be lower than the global band.

4.2 **Reasonable preference category s167(2) (b) – people who are owed a homelessness duty by a Local Authority under Part VII of the Housing Act 1996 .**

- Customers assessed as meeting the criteria for this category are given additional preference by the scheme and will be placed in local Band A. additionally the Local Authority may discharge their duty to a 12 month Assured Shorthold Tenancy (AST) into the private sector in accordance with the Localism Act 2011

Customers who will be given this additional preference are:

- People who are in priority need and the Local Authority has accepted that it owes the household a full homeless duty under section 195(2) as being threatened with homelessness in the next 28 days, and the Local

Authority is taking steps to try and prevent that homelessness from occurring. People who have been accepted as being owed the full homeless duty under section 193(2) - those who are deemed homeless, in priority need and unintentionally homeless.

Note: The Band awarded will be Local Band A (ie Band A only applies in the authority where the homelessness decision was made) except in the case where the household also meets the criteria for Exceptional Need to Move (s3)

4.3 Reasonable preference category s167(2) (c) – people occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions.

Customers being assessed as meeting the criteria for this category will be placed in Bands A, B or C. Customers will be placed in Band C where they have been given reasonable preference and Bands A and B where they have been awarded additional preference by the scheme. Additional preference is awarded based on the severity of the housing need.

Additional Preference

Customers will be awarded additional preference and placed in Band A in the following circumstances

- Households living in conditions which give rise to an imminent risk of harm and where the Local Authority has served a Prohibition Order under Part 1 of the 2004 Housing Act.
- Excessive Overcrowding ie. Where a local authority officer has made an assessment using the Housing Health and Safety Rating system and concluded there is a high risk of harm due to overcrowding. (LR)

Note: Customers may be given a Band B priority based on a combination of housing needs – see Cumulative Preference (section 4.7) below.

Owner occupiers will only be considered if they are elderly, disabled or have a mental health problem and their property is likely to give rise to an imminent risk of harm and they do not have the financial means to carry out essential repairs.

Priority will be given to private tenants where the landlord has been approached but works required to remedy a Category 1 hazard have not yet been undertaken. Once the Local Authority has verified that works have been carried out , priority will be removed.

Reasonable Preference

Customers will be awarded reasonable preference and placed in Band C in the following circumstances:

- Customers who are living in overcrowded conditions. Reasonable preference will be given to households lacking one bedroom or more.

The standard used for the assessment of overcrowding by Cumbria Choice is as follows:

a separate bedroom should be allocated to the following persons:

  - A person living together with another as husband and wife (whether that other person is of the same sex or the opposite sex).
  - A person aged 16 years or more.
  - Two persons of the same sex aged less than 16 years.
  - Two persons (whether of the same sex or not) aged less than 10 years.
  - Any person aged under 16 years in any case where he or she cannot be paired with another occupier. .

Customers who have voluntarily allowed family member(s) or other(s) to move into their property will not be given reasonable preference.

Social housing within the Cumbria Choice region is subject to acute pressure and there is a particularly high demand for family size accommodation. Partner organisations need to make best use of their stock and for this reason children will only be included in the overcrowding calculation at their main place of residence.

Tenants of Landlords within the Cumbria Choice Scheme who under occupy a family home where a move will free up accommodation.

- Additional preference for customers who need to move on hardship grounds where failure to move will cause hardship to themselves or others. Social housing tenants of a partner organisation that are moving to a property that will have at least 2 bedrooms fewer than their current property will be awarded Band B

- Reasonable preference for customers who need to move on hardship grounds where failure to move will cause hardship to themselves or others. Social housing tenants of a partner organisation that are moving to a property that will have 1 bedroom less than their current property will be awarded Band C or Band B (cumulative preference) where the household is also suffering financial hardship under Welfare Reform

4.4 Reasonable preference category s167 (d) – people who need to move on medical or welfare grounds including grounds relating to a disability.

Customers being assessed as meeting the criteria for this category will be placed in Bands A, B or C. Customers will be placed in Band C where they have been given reasonable preference and Bands A or B where they have been awarded additional preference by the scheme. Additional preference is awarded based on the severity of the housing need.

Note: Preference will only apply where the applicant is applying for properties that are suitable, will meet their medical need and are reasonably capable of being adapted and at a reasonable cost.

Note: Customers given only reasonable preference (Band C) may be given a Band B priority based on a combination of housing needs – see Cumulative Preference (section 4.7) below.

- Medical Grounds – Additional Preference

A customer who has an urgent need to move for medical reasons or due to a disability, which is being exacerbated by their current housing situation will be awarded additional preference and placed in Band A. This would include people whose safety is at risk due to their current housing or who are completely housebound because of the type of accommodation they live in.

The assessment will be made by an officer of the partner organisation with specific responsibility for the assessment of such cases and following a set of criteria based upon routine medical conditions and property conditions/facilities. The officer will make the assessment from information given by the customer who will be required to complete a medical questionnaire.

In most cases the assessment will not be of the customer's health but how their accommodation affects their health. In exceptional circumstances that do not meet the set criteria the case will be passed to a senior officer within the partner organisation administering the application.

For more serious cases evidence maybe required from an Occupational Therapist, Doctor or Consultant. In some cases a decision may be taken to pass the information to a medical consultancy commissioned by the Partnership for the purposes of clarification. The decision on whether to award priority will be taken by the senior officer of the partner organisation.

The following are examples of cases that would qualify for Band A priority:

- An immediate life threatening condition which is seriously affected by the current housing and where re-housing would make it significantly easier to manage.
- A member of the household cannot be discharged from hospital until a suitable adapted property is provided.
- Due to limited mobility a person is unable to access essential parts of the property eg. bathroom/toilet and requires re-housing into accommodation suitable for their use.
- A member of the household is elderly or disabled or has a progressive illness and is likely to require admission to hospital or residential/nursing care in the immediate future and re-housing would enable the person to remain at home.

    - Armed forces personnel who need to move to suitable adapted accommodation because of a serious injury, medical condition or disability which he or she or a member of their household, has sustained as a result of service.
    - People who have a severe mental health or learning disability which significantly affects their ability to lead a normal life and which puts them at risk of admission to hospital or residential care.

- Medical Grounds – Reasonable Preference

Customers whose housing is unsuitable for severe medical reasons or due to disability but who are not housebound or whose safety is not at risk due to their current housing will be awarded reasonable preference and placed in Band C.

Their housing conditions will need to contribute to causing serious ill health. Their circumstances will be assessed in the same way as for the additional preference category above. The assessment will be made by an officer of the partner organisation with specific responsibility for the assessment of such cases and following a set of criteria based upon routine medical conditions and property conditions/facilities. The officer will make the assessment from information given by the customer who will be required to complete a medical questionnaire.

In most cases the assessment will not be of the customer's health but how their accommodation affects their health.

In some cases evidence maybe required from an Occupational Therapist, Doctor or Consultant and a decision may be taken to pass the information to a medical consultancy commissioned by the Partnership for the purposes of clarification. The decision on whether to award priority will be taken by the partner organisation.

The following are examples that would qualify for Band C priority:

- Children with severe conditions such as autism, or cerebral palsy where their long term needs cannot be met without settled accommodation
- A person whose disability means that re-housing would enable them to overcome physical barriers created by their current accommodation e.g. stairs and steps.
- 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 medical 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.

Welfare Grounds – Additional Preference

- Domestic Abuse, extreme violence or extreme harassment.

Customers who need to move due to domestic abuse, extreme violence or extreme harassment will be awarded Band A priority. This would include disability, racial, homophobic or transgender harassment and will be awarded for exceptional circumstances where there is a high risk to the tenant or their family's safety if they remain in the property/area.

This priority will be given in circumstances where the customer does not wish to make a homeless application but cannot remain in the property long-term or has moved to stay with relatives or friends because of the threat. They will be awarded this priority without going through the homelessness route.

Tenants of partner organisations can be assessed and given Band A priority by their own Landlord (regardless of who is administering their housing application). All other applicants to the scheme will be assessed by the Local Authority Housing Options Team.

The assessment will be made by a senior officer within the partner organisations and will be based on evidence provided by the customer and other appropriate statutory and voluntary agencies. This would include, the Police, Social Services, referrals by MARAC, Domestic Violence and Lesbian and Gay support groups.

- Move on from supported housing projects

Customers who are moving on from a specified list (see appendix 4) of supported housing projects will be awarded Band B.

They must have a vulnerability and an urgent housing need that is best met through the provision of long term settled housing. To qualify for this additional preference the support provider will provide written evidence that the customer:

  - Has successfully completed a minimum of 6 months in the supported housing scheme (except in proven exceptional circumstances when a lesser period may be considered).
  - is ready to move to independent settled accommodation.
  - has a support package that has been assessed and is in place.

Customers can register when they move into supported accommodation and are likely to be awarded Band D priority. When they are ready to move on they will be awarded Band B priority. The 'effective date' for all move on customers will be the date they moved into that providers supported housing scheme regardless of their date of application.

- Young Person in Need (including young people moving on from Care).

Young people referred by Social Services in accordance with the joint protocol will be awarded Band B. All referrals by Children's Services will be made following the Joint Protocol – currently the Interim Protocol 16-17 year old presentations in relation to accommodation (March 2010) in Cumbria.

Referrals will be made where a young person is leaving care or housing and child in need assessment with a recommendation for housing has been made. The criteria for the award of additional preference are:

- The young person 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 young person is in need of medium or long term tenancy support.
- The support package has been assessed and is in place.
- Their needs are such that accommodation in the private rented sector, through its short term nature, would have a detrimental effect on their move to independent living.

Welfare grounds – reasonable preference

- Customers who are assessed as facing housing related financial hardship where re-housing through Cumbria Choice will alleviate the situation.
- People who suffer financial hardship as a result of housing benefit changes under Welfare Reform.
  (Existing social housing tenants in receipt of housing benefit occupying properties which are too large for them under revised HB size criteria)

4.5 Reasonable preference category s167(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 others.

Customers being assessed as meeting the criteria for this category will be awarded reasonable preference and placed in Band C.

Note: Customers given only reasonable preference (Band C) may be given a Band B priority based on a combination of housing needs – see Cumulative Preference (section 4.7) below.

The people who meet these criteria are those who need to move for:

- Employment purposes
- To be near relatives to give or receive support
- To access medical treatment/social services facilities.

Customers who are assessed as meeting these criteria for employment purposes will be placed in Band C. Priority will only be given in exceptional circumstances and customers will need to show:

- That they need to move to take up or continue an employment opportunity not available elsewhere. They will only be considered

where they do not live within a reasonable commuting distance and will be required to provide confirmation of employment details from the employer.

Customers who are assessed as meeting this criterion for support purposes will be placed in Band C. Priority will only be given in exceptional circumstances and customers will need to show:

- That they require substantial and ongoing support from relatives or friends. This will only be considered where there is a severe mental health, medical or welfare issue and there are reasons why this support cannot be made available through reliance on public transport or the customer's own transport.

Example of the type of information required in order to assess the priority include:

- Confirmation of name and address of the person who is to provide the care and the person who is to receive care
- Evidence of their care requirements (Doctor, Social Services)
- Evidence of links to care groups
- Disability living allowance receipt

Customers who are assessed as meeting this criterion for access to medical treatment or social services facilities will be placed in Band C. Priority will only be given in exceptional circumstances and customers will need to show:

- That they have a need to access medical care and/or social services facilities and that cannot be met through reliance on public transport, the customer's own transport, or through provision put in place by health or social services.

Example of the type of information required in order to assess the priority include:

- Confirmation of name and address of the medical or social provision to which they need access.
- Evidence of their care requirements (Doctor, Social Services)
- Evidence that no other provision is available and no assistance can be provided to enable them to access the service.

4.6 Economic and Community Contribution

This scheme aims to support economic growth within the County and to value those who make a positive contribution to their community. For customers awarded no reasonable preference and placed in Band D a proportion of properties will be made available and those who meet the economic and community criteria will be placed at the top of the shortlist.

Customers being assessed as meeting the criteria for this category will be placed in Band D Plus. Customers will be awarded this additional priority in the following circumstances:

- Low income working household – the scheme wants to encourage those people who work but are on a low income to remain in the area and contribute to the economic activity of that area.

Low income households are those who are working but would find it difficult to access Home ownership or Low cost Home ownership.

Working households are those where at least one adult member is in employment. This is a permanent contract, working as a temporary member of staff or being self-employed. The person will only qualify if they have been employed for 9 out of the last 12 months. Verification will be sought at the point of application as well as at the point of offer.

Customers must provide payslips, P60, bank statements or a verifying letter on headed paper.

- Community Contribution – the scheme wants to encourage people who make their communities strong, stable and healthy places to live so that they will remain in that community and continue to contribute to sustaining the local area.

Volunteers must have been volunteering for a continuous period of at least 6 months at the point of application and must have continued in voluntary work at the point of offer. Volunteering must be for a not-for-profit organisation or a charity and must be for a minimum of 10 hours per month.

Note: Tenant and resident organisations recognised by a Local Authority or Registered Social Landlord are included.

Evidence of volunteering work will be required from the Manager responsible for the volunteer. This person must not be related to the customer.

- Customers of the 9 RP's partners of the Cumbria Choice scheme with a positive tenancy history - the scheme wants to encourage tenants to meet the terms of their tenancy agreement and to assist and retain within the social rented sector those tenants who do.

  Tenants must have a positive tenancy history to qualify:
  - No on-going involvement in anti-social behaviour or criminal activities.
  - A clear rent account maintained for a period of 1 year or more.
  - A property maintained in accordance with the tenancy agreement
  - No breaches of the tenancy agreement in the last 3 years.
  - Not have an outstanding unspent conviction.

- Pre Tenancy Qualification Award – the scheme wants to encourage and help young people under 25 to be responsible tenants and where they are willing to learn how to be a good tenant to reward that effort.

In some Local Authority areas courses are available for young people to attend and gain a 'young person pre-tenancy qualification'. Where a young person has gained this award and shown they know how to live as a responsible tenant they will quality for this category.

They must have attended a course recognised by the Local Authority or obtained an NVQ level qualification.

4.7 Cumulative Preference

This scheme takes account of customers who have more than one housing need and gives them additional priority for example people who have a medical need and are also living in overcrowded conditions.

Customers who have two or more of the housing needs as listed in Band C will be placed in Band B to reflect their additional housing needs:

- Households needing to move to a particular locality on hardship grounds
- Households overcrowded/under occupying
- Households where there is one or more category 1 hazard as assessed under the Housing Health and Safety Rating System (HSSRS) as defined under Part 1 of the Housing Act 2004.
- Medical need
- Households suffering financial hardship as a result of housing benefit changes under Welfare Reform

4.8 Reduced Preference

Local Authorities have a right to reduce a person's priority for housing under their allocation policy. This action will be taken in order to enforce to existing and prospective tenants the importance of taking seriously their responsibilities as a tenant:

- The responsibility of paying their rent and service charges.
- The responsibility to keep the property in good repair and not to cause deliberate damage.
- The responsibility to conduct their tenancy in accordance with their tenancy agreement and not to cause nuisance or annoyance to their neighbours.

Reduced preference will also take account of other criteria and will be given in the following circumstances:

- There is a current or former debt owed to a social or private sector landlord.

- There is a history of unacceptable behaviour within the last 2 years (refer to appendix 7.3 for definition).
- Customers who have been found to be intentionally homeless but would otherwise meet one or more of the conditions for Band E.
- Customers who do not have a local connection with the Local Authority area.
- Customers who have the financial resources to purchase a property
- Customers who have refused 2 offers of accommodation that they have 'bid' for or been offered under management discretion within the last 12 months.
- Young people less than 18 years of age unless they meet the criteria for being offered accommodation which would be those who are accepted as homeless with a full duty or referrals from Children's Services .
- Tenants with starter or probationary tenancies.

Reduced preference due to current or former housing related debt

- Housing debt from all tenures will be considered and includes current or former rent arrears and/or recharges for repairs from property damage.
- Non housing debts will not be considered. This includes for example, housing benefit overpayments, mortgage arrears. These debts are either not legally enforceable in tenancy law as a condition of the tenancy or under grounds for possession in the Housing Act 1985.
- Where a customer has a debt each case will be considered individually and in certain circumstances the customer will not be given reduced preference. Examples include but are not limited to:
    - Customers who have been accepted by a local authority as unintentionally homeless and in priority need.
    - The customer has been a victim of Domestic Violence
    - .The debt arose due to the customer's vulnerability.
    - The customer was unable to pay due to circumstances other than deliberate non payment.
    - The customer has suffered financial hardship as a result of welfare reform.

Note: In circumstances where a debt is owed to a housing organisation and the customer is not to be given reduced preference in accordance with the examples listed above the organisation to whom the debt is owed may decide not to make an offer of accommodation. The customer will be expected to set up and maintain a repayment plan to the creditor landlord. Other RP's may choose to not to make an offer of accommodation where the repayment has not been set up or maintained.

Any debt will be assessed at the point at which the customer's priority is being considered unless any new information becomes available at a later time and the following will be considered:

- The amount of the arrears/debt
- Whether there are any exceptional circumstances as detailed above. If this is the case then the customer will not be subject to reduced preference.
- Whether the customer has entered into any arrangement to clear the arrears/debt and if so, the amount already paid off and the length of time and regularity of any payments.

Where a decision is taken to give reduced preference the following will apply and the customer will be advised of the actions they need to take:

- Customers who owe £100 or over but less than £500 will be given reduced preference and placed in Band E. Before they can be reinstated to a higher Band they must sign an undertaking to repay the outstanding debt. They must agree and maintain a repayment plan over a 13 week period.
- Customers who owe over £500 but less than £1000 will be given reduced preference and placed in Band E. Before they can be reinstated to a higher Band they must sign an undertaking to repay the outstanding debt. They must agree and maintain a repayment plan for the debt for a period of at least 6 months and have reduced the debt owed to less than £500.
- Customers who owe a debt over £1000 will be deemed ineligible based on a case by case basis and subject to any exceptional circumstances. This is because customers with that level of arrears will be considered by the Local Authority to be guilty of unacceptable behaviour and to be unsuitable to be a tenant by reason of that behaviour.

Customers can apply at any time to have their application reinstated where they are able to show an improvement in their behaviour, in this instance full payment of the debt owed or maintenance of the agreement made.

<u>Reduced preference due to unacceptable behaviour.</u>

Customers will be given reduced preference where it can be satisfied that having considered all the available evidence they (or a member of their current or prospective household) has failed to adhere to the terms of any current of previous social housing or private sector tenancy agreement.

This would include but is not limited to following examples of unacceptable behaviour:

- Failing to maintain the property within the terms of the agreement – for example damage to the property, accumulation of large amounts of rubbish in and around the property.
- Committing acts causing or likely to cause nuisance or annoyance to neighbours or others in the locality where they live or where they previously lived. This would include noise nuisance, threatening or abusive behaviour.

- Criminal behaviour that was relevant to the tenancy and/or locality, for example being in possession of illegal drugs, acts of public disorder.
- Serious breaches of a social or private sector tenancy agreement – for example operating a business from the premises, having an unreasonable numbers of pets at the property.
- Behaving in a threatening, abusive or obstructive manner towards staff of the partnership and or their contractors.

Reduced preference due to the refusal of two reasonable offers of accommodation.

Customers who have bid for and refused 2 offers of accommodation (including any reasonable offer made through management discretion) within 12 months of the date of their first offer will have their priority for housing reduced for a 12 month period. After this 12 month period of reduced preference the customer will be returned to their original Band with their original date as long as a change of circumstances has not occurred.

Note: this does not apply to homeless customers owed a local authority duty who will be made one reasonable offer.

Notification of reduced preference

Customers who have been given a reduced preference will be provided with written notification of the decision which will contain the following information:

- The reasons for the decision to give reduced preference.
- The Band that their application would be awarded had they not been given reduced preference and placed in Band E.
- Their right of appeal and the requirement to put their request in writing within 21 days of receiving the decision.
- What they need to do before their application will be placed in the Band determined by their housing needs.
- That a customer can ask at any time for their application to be removed from the reduced preference Band. The request for removal must be made in writing and must set out why the customer believes that the reduced preference they have been given is no longer justified.

Section 5 How the Scheme Operates

5.1 Advertising the Properties

Choice based lettings are about the customer having choice in where they live. Properties will be advertised and customers will be able to indicate the properties for which they want to be considered by 'bidding'. Once the bidding process closes a shortlist will be compiled and the property allocated taking account of the banding priority of the applications and their time waiting.

The partnership organisations have agreed to advertise the majority of their properties through Cumbria Choice. Properties will be advertised on a weekly basis on both the website and in newsletter form.

Properties will be advertised in an easy to read format. They will usually include a picture of the property or scheme in which it is located. Property adverts will include details of the property and will indicate suitable household size as well as giving information about the local area. They will (where appropriate) indicate the priority band of customers eligible to apply. The properties will clearly indicate which housing organisation is the Landlord.

Properties may be advertised during the 4 week notice period given by an outgoing tenant. If the notice is subsequently withdrawn by the tenant the property will therefore be unavailable to let.

All categories of properties will be advertised. General needs properties; properties that have been adapted for those with disabilities; properties that are specifically for the elderly and which may have a warden and/or an emergency call system. Adverts will clearly indicate any restrictions on bidding (e.g. where properties have been adapted and/or are specifically for people with disabilities) and will detail any particular criteria that apply (eg.where full occupancy is required, affordability criteria etc.)

Bids from customers will only be accepted if they meet all of the eligibility criteria for the property.

5.2 Extra Care Properties

Properties which provide extra care facilities are provided under the Supporting People Programme. Customers requiring these properties will need to apply direct to the provider.

5.3 Sheltered Housing

Sheltered accommodation is included within the scheme. It is generally for people of 60 years and older and offers independent living with the added security and support of a warden service. In certain circumstances it may be advertised for people less than 60 years. Property advertisements will clearly state the age requirements of customers able to 'bid' for a property.

5.4 Quota system

A quota system may be used to allow customers in lower priority Bands access to housing. This allows a proportion of properties to be advertised as

available only to those in a specific Band. The system will be monitored to ensure that it does not operate to the detriment of those with a higher need for housing.

Local Authorities will individually agree the quota systems in their own areas in conjunction with their partner social housing providers. They will be individually decided to meet local requirements.

Partners will have formal agreements with the relevant local authority, specifying the % lets for each band. These will be reviewed by the partnership on an annual basis.

The quota system operated in each Local Authority area will be available on the Cumbria Choice website and on request from the Offices of all partner organisations.

5.5 The 'Bidding' process

Properties are advertised on a weekly cycle. Customers may express an interest - 'bid' on any advertised property that meets their needs. They are able to place up to 3 bids each week.

Bids can be made in a number of ways: on the website using the username and password; by telephoning or visiting the office of a partner organisation; by mail; by automated telephone bidding; by proxy bidding (see below 5.7).

A person may bid for any suitable property advertised in the scheme; this means any area covered by the scheme and any landlord advertising in the scheme. Bidding is not restricted to areas where a person may have a local connection unless the advert specifies 'local connection only'.

Customers are able to check their position on the list at the time of the bid, together with the total number of bids already placed. This allows customers to make decisions about their choice of property and the likelihood of being successful. Within the bidding period, customers may withdraw bids and make further bids.

Only the customer whose bid is successful will be contacted.

5.6 Proxy Bids

The relevant Local Authority will be able to place bids on behalf of homeless households who have not made bids or not made any successful bids during the 6 week period. In addition the Local Authority will also make proxy bids on behalf of homeless households who have not yet had a S184 decision following a 6 week period in temporary accommodation regardless of their

banding.They will give due consideration as to whether it would be a ‘suitable offer’ should the bid be successful.

Customers who have been awarded Band A will also be subject to Proxy Bids, if they have not been bidding, following a 6 week period of being awarded the Band subject to suitable accommodation being available. If the customer refuses an offer which is deemed reasonable and suitable, Band A preference may be reduced.

It is also appreciated that there will be a number of vulnerable customers who will require agencies to make bids on their behalf. Proxy bids will be taken from agencies and support groups where a formal arrangement has been agreed and the customer gives their consent for bids to be made on their behalf.

5.7 Shortlisting

At the end of the advertising period a shortlist of suitable applicants will be produced by the web based IT system.

Where priority is to be given to applicants with a local connection to the area this will be reflected in the shortlist. (See local connection 5.9)

The customer at the top of the shortlist will be made the offer unless there is reason not to do so. (See ‘The offer’ 5.11).

Where a customer is at the top of more than one short list they will be contacted to make a preference within 24 hours and before a viewing can be arranged. Where there are two households with the same Band and length of time on the register a decision to offer the property will be based on the household who would be most suitable for the property type.

Where the property advert has indicated specific requirements such as age or accessibility, only those customers meeting those requirements will be eligible for an offer.

5.8 Local Connection

In situations where priority is to be given to applicants with a local connection the process will be:

- Banding priority will apply
- Within each Band those with a local connection to the Local Authority in which the property is located will be given a higher priority than those whose local connection is with other Cumbrian Authorities.
- Customers with no local connection to any Local Authority partner organisation within the Cumbria Choice scheme may be given reduced preference.

Properties where no local connection is required will be identified through information given in the advert.

For some towns and villages where there is a high demand for housing additional priority may be given to customers who have a local connection to the particular town or village. Advert details will state where a customer having a local connection to the specific town or village may be given priority. Those towns and villages operating a local connection policy will be identified within each Local Authority's local lettings plans.

A local connection means that a customer:

- currently resides in the area in either temporary or permanent accommodation and has been resident in the Local Authority area or specified town/village for at least 6 out of the past 12 months or 3 out of the past 5 years.
- Is at present employed in the district or specified town/village. The local authority should obtain confirmation from the employer that the person is in employment and that the employment is not of a casual nature.
- Has close family connection with someone who lives in the Local Authority area or specified town/village. Family connection means: parents, adult children, brothers or sisters, grand parents and foster carers or guardians who have been resident in the district for a period of at least the last 5 years.
- There are special circumstances which are considered to give rise to a local connection with the Local Authority area or specified town/village. For example this would include ex-servicemen and serving members of the armed forces posted to the Local Authority area.

The partnership aims to improve mobility within the sub region and will advertise at least 10% of all partner organisation properties to all customers across the sub region regardless of local connection.

5.9 Section 106's

Under the Planning Act some developments are subject to Section 106. This requires property to be let to customers with a local connection to stated

Parishes. Where this applies only those applicants meeting the requirements of the Section 106 will be eligible for an offer of a property.

Advert details will state when the letting of a property is governed by a Section 106.

5.10 The Offer

Prior to an offer being made the landlord of the advertised property will carry out a further verification of the customer's eligibility and priority. In certain situations the offer will not be made:

- If since joining the scheme an applicant has become ineligible.
- On verification of the applicants' details, the priority band was found to have been incorrectly awarded.
- The applicants' circumstances have changed since the priority band was awarded and the applicant is no longer entitled to the same level of priority.
- The partner landlord has good housing management reason not to offer a property.

In order to address issues relating to under-occupation, partner landlords may require either that the property will be fully occupied by the new tenant **or** allow a level of under-occupancy. Full occupation may be required where high demand exists and/or the partner landlord considers full occupancy necessary to make best use of its housing stock. When letting to achieve full occupancy the letting made will comply with the Household Type and Property Size criteria as shown in Appendix 4. Individual landlords will publish information about their approach to occupancy following consultation with the local authorities in whose areas they operate. This will be available on the Cumbria Choice website.

When an offer of the property is made the customer may be required to provide proof of their identity and that of all members of their household. E.g passport, photo driving licence, birth certificate etc.

5.11 Refusing and Non Replies to Offers

Customers who have bid for and refused 2 offers of accommodation (including reasonable offers made under management discretion) will have their priority reduced for 12 months. (see section 4: 8.0 reduced preference).

Note: those household accepted as statutorily homeless and owed a duty to house will lose their priority status if they refuse a 'suitable offer of accommodation'.

If a customer does not reply to an offer within 2 working days of receiving the offer it is deemed to have been refused and the property will be offered to the second customer on the shortlist.

Where the customer has given their consent for someone to either act on their behalf or receive the offer, we will ensure notification is provided to them.

5.12 Local Lettings

Partner organisations may draw up local lettings policies for an area or estate to meet the specific needs of that local community. Local lettings policies may be used to tackle particular management problems and/or to address imbalances in the community.

Schemes will be drawn up where either, local residents or partner organisations have identified its benefit to the local community. These arrangements will be agreed and reviewed by the Partnership.

Where such a scheme applies a property may not always be offered to the bidder with the highest priority. Local Lettings schemes will be publicised on the Cumbria Choice website and available in leaflet form to ensure openness and transparency in the lettings process.

5.13 Feedback on Lettings

A main aim of the Cumbria Choice scheme is to operate an open and transparent lettings system.

The result of lettings made through the scheme will be published on the Cumbria Choice web site and at the end of the property advert newssheet.

5.14 Other Options

A further aim of the scheme is to promote other potential housing options appropriate to applicants. These might include shared ownership/shared equity properties, mutual exchanges, private rental and lodgings. Partner landlords will raise awareness of these options and support and advice to applicants considering such options.

With regard to mutual exchanges, all partners are members of the national mobility scheme and the Cumbria Choice website provides a link to this scheme. The option to mutually exchange will in particular be promoted to applicants who under-occupy their homes. Partners will proactively seek to identify exchange opportunities for applicants who under-occupy, as well as advising of other potential options to enable downsizing.

Section 6 The Review Process

Customers who want to query a decision made in relation to their application to register and any other subsequent decisions are first able to speak to the Officer making the decision to have that decision clarified or amended. This is

outside the review process and does not affect a customer's right to ask for a formal review of the decision.

6.1 There is a right to a review of a decision in the following situations:

- The customer disagrees with the band in which they have been placed.
- The customer considers that a decision has been reached based on incorrect information.
- The customer has been treated as ineligible on the basis of their immigration status.
- They have been treated as ineligible to join the register due to serious unacceptable behaviour.
- Their application has been given reduced preference.

6.2 Customers will be notified in writing of decisions made in respect of the review and will be advised of their right to request a further review of that decision.

6.3 Where a customer is excluded or suspended from the Register they will be given full information on the reason for the decision. They will be advised of what action they need to take to rectify the situation and any appropriate advice or assistance available.

6.4 Customers must request a review of a decision within 21 days of being notified in writing, unless there are exceptional circumstances.

6.5 Customers must contact the partner organisation dealing with their application and will be advised to put their request in writing. However they are able to telephone or visit an office in person and request that their request for a review is taken in writing by an Officer. They must give reasons why they believe an incorrect decision has been made.

6.6 The review will be carried out by a senior officer in the organisation dealing with the application. That officer will not have been involved in making the original decision.

6.7 Cumbria Choice will aim to complete and inform the applicant in writing of the decision within 21 working days, after taking into account any additional information that has been provided by the customer. Alternatively, the customer will be advised of any time extension required to make the decision.

6.8 The customer will be advised of the reasons for the decision and their right to request a further review if they are dissatisfied with the decision.

6.9 Customers must request a further review within 21 days of being notified in writing of the review decision. Customers will only be entitled to a further review if they have new information relevant to their case, that they want the review panel to consider.

6.10 Customers will be required to request a further review in writing and to submit additional information with their request. They will be advised that they are able to seek assistance from the partner organisation to make this request.

6.11 A review of the decision will be considered by a panel of at least 2 officers from within the partnership and one tenant representative. It will not include officers from the organisation that dealt with the review.

6.12 Cumbria Choice will aim to complete the second review and inform the applicant in writing, of the decision within 21 days of receiving all information from the customer. This period may be extended on notification to the customer.

6.13 A customer still has the right to continue with their complaint to the Ombudsman service.

Section 7 Appendices

7.1 Appendix 1 – Definition of Terms

Choice Based Lettings (CBL) - The system of letting property that gives customers choice in where they live through advertising property.

Common Housing Register – One list for all of Cumbria of people applying for social housing (previously 'housing waiting lists').

Banding Scheme – the method by which customers are prioritised for social housing (previously 'points schemes').

Customers - those people applying to the scheme for housing.

Bidding - the term used to describe people who register an interest in a property (no money is involved in making the bid).

Adapted Property - property that is suitable for those with a physical disability i.e. where a stair lift has been fitted.

Effective Date - the date used to decide between customers in the same Band to establish who has waited longest.

Fully Occupied – the bedrooms in the property are being fully used in terms of the household occupying the property in accordance with the table in Appendix 4. When they are not fully used the property could be considered underoccupied.

Global Band / Local Band – In most cases a Band awarded applies for properties in all local authority areas and is therefore global. In a few cases defined in the policy a band only applies within the local authority area where the applicant is living and is referred to as a local band.

The Partnership – the name for the District Councils and housing organisations that have funded, developed and continue to operate the scheme.

Letting Policy - the means by which it is decided how property will be offered to customers.

Local Lettings - short term policy made in local areas (to tackle specific, identified housing management issues) on how property will be offered that differs in some part from the overall scheme policy.

Social Housing Providers - the term for a variety of housing organisations that provide not for profit housing and included local authorities, housing associations.

Housing Options - a term used to describe a service that advises customers of all their choices and includes mutual exchanges, low cost home ownership and renting in the private sector.

Accessibility - used here the term refers to how 'user friendly' the service is to all people who may want to use it.

Void Times - the length of time a property stands empty before someone is able to move in.

Hard to Let - low demand property where it takes longer to find a tenant.

Management Discretion - available property that is not advertised but offered straight to an identified person.

Automatic Bidding - within the ICT system a means of expressing an interest in a property for someone, without them needing to make the bid themselves.

Starter/Probationary Tenancies - the tenancy given to new tenants by some organisations that has reduced security of tenure for 1 year.

7.2 Appendix 2 - Contact Details for all Partner Organisations

Accent Housing Association
Ambassador House
Dalton Road
Barrow-in-Furness
LA14 1HZ

Tel: 0845 6780599

Allerdale Borough Council
Allerdale House
New Bridge Road
Workington
CA14 3YJ
Tel: 01900 702702

Barrow Housing Department
Cavendish House
78 Duke Street
Barrow-in-Furness
LA14 1RR
Tel: 01229 876523

Carlisle City Council
Civic Centre
Rickergate
Carlisle
CA3 8QG
Tel: 01228 817200

Copeland Borough Council
The Copeland Centre
Catherine Street
Whitehaven
CA28 7SJ
Tel: 0845 0548600

Derwent & Solway Housing Association
Stoneleigh
Park End Road
Workington
CA14 4DN
Tel: 01900 607500

Eden District Council
Mansion House
Friar Gate
Penrith
CA11 7YG
Tel: 01768 817817

Eden Housing Association
Blain House
Bridge Lane
Penrith
CA11 8QU
Tel: 01768 861400

Home Group
The Copeland Centre
Catherine Street
Whitehaven
CA28 7SJ
Tel: 01946 517650

Impact Housing Association
Nook Street
Workington
CA14 4EH
Tel: 01900 842100

Riverside Housing Association
English Gate Plaza
Botchergate
Carlisle
CA1 1RP
Tel: 0845 3458500

Two Castles Housing Association
3 Castle Street
Carlisle
CA3 8SY
Tel: 01228 547463

South Lakeland District Council
South Lakeland House
Lowther Street
Kendal
LA9 4DQ
Tel: 01539 733333

South Lakes Housing (ALMO)
Little Aynam House
Little Aynam
Kendal
LA9 7AH
Tel: 0845 0570080

7.3 Appendix 3 - Eligibility

The Cumbria Choice Scheme acknowledges that it is the main access to social rented housing for people wanting to live in Cumbria. In this respect it aims to be as open and inclusive as it can be to those people wanting to apply to the Register. It aims to make the scheme accessible to all, to encourage

applications from people from all parts of the community, and to ensure that its policies and procedures do not discriminate.

Cumbria Choice scheme does operate a policy of not accepting onto the Register those Customers who are ineligible due to serious unacceptable behaviour. This action is taken for the following reasons:

- Partner organisations within Cumbria Choice have a responsibility towards their existing tenants to put in place policies that allow them to live in safe and stable communities.
- Cumbria Choice wants to promote through its allocation policy the importance of good tenant behaviour amongst both existing and future tenants.

How decisions on eligibility will be administered:

- Blanket exclusions are unlawful and will not be made: an individual assessment will be made based on the circumstances relevant to each case.
- The partnership will ensure consistency in making decisions
- Decisions will be authorised by a senior officer.

A customer's eligibility for housing will be considered:

- At the time he or she applies to join the CBL Register
- At the point at which he or she is to be considered for an allocation of property

1.0 <u>Ineligible due to Serious Unacceptable Behaviour</u>

1.1 Part 6 of the Housing Act 1996 as amended by the Homelessness Act 2002 (section 160A (7)) allows the Local Authority to treat a person as ineligible where:

'The applicant, or any member of his household, has been guilty of unacceptable behaviour serious enough to make him/her unsuitable to be a tenant'
'And at the time of the application, the customer is still unsuitable to be a tenant because of that behaviour'

1.2 When reaching a decision on whether an applicant is ineligible Cumbria Choice will follow the code of guidance for local authorities 2002 which sets out the 3 steps to consider when making an assessment:

- Is the behaviour unacceptable?: Behaviour will be regarded as unacceptable if it would have entitled the housing authority to a possession order if the applicant had been a secure tenant. This will be applied whether or not the applicant was actually a secure tenant. The behaviour must relate to the customer or a member of their household. Behaviour that relates to a person

who is no longer a member of the household cannot be taken into account. e.g. an ex-partner.

- Is the unacceptable behaviour serious enough to make the applicant unsuitable as a tenant of the landlord?: Where there would be entitlement to a possession order the partnership will need to ensure that the behaviour was serious enough to make the person unsuitable to be a tenant of one of the housing organisations in the partnership.
- Is the behaviour current or has it improved?: Unacceptable behaviour will be behaviour at the time the application is considered. Previous unacceptable behaviour may not justify a decision to consider the applicant as unsuitable, if that behaviour can be shown to have improved.
- Where all three steps of the assessment have been satisfied the applicant will be treated as ineligible.
- Each decision will be taken based on the individual circumstances of the case. Where a decision is taken to treat a person as ineligible to join the register the information will be collated by the officer and passed to a senior officer for authorisation.

1.3 Identifying Serious Unacceptable Behaviour:

- Housing records: this will identify the level of action taken by the housing organisation. Letters; Notice seeking Possession; injunctions; intention/actual Court action.
- Note: where possession action was taken and was unsuccessful, then serious anti-social behaviour cannot be assessed has having occurred. (in these cases the customer's application will be assessed for reduced preference)
- Reports obtained from previous or current landlords
- Reference to information held by other statutory and/or voluntary agencies. This includes information gained from police reports and where in operation through the information sharing protocol with the Police.
- Customers who have unspent criminal convictions will be treated as ineligible for accommodation where they are guilty of serious offences that would threaten the safety of a local community. The Scheme will liaise with support agencies, the Police and Probation Service to consider the housing options for these applicants, where appropriate. Spent convictions will not be taken into account.

The type of offences that should be considered are:

- Owing significant rent arrears or other housing debt – in most cases it is likely that the debt will be over £1,000.

- The use of dwellings for the cultivation, supply and use of drugs, especially class A drugs.
- Persistent and widespread criminal activity including domestic burglaries and vehicle crime.
- Physical assaults, especially those resulting in physical injury, including domestic violence.
- Serious damage to property, including dwellings and cars, for example arson attacks and windows being smashed.
- Serious threats of violence and damage, including threats to kill, threats to petrol bomb.
- Serious disorder, in particular associated with groups.
- Very serious and persistent noise nuisance over long periods of time.
- Persistent and offensive verbal abuse, due to a person's religion, ethnicity, sexual orientation, disability or other factors.
- Applicants who have had action taken against them for racially motivated offences.
- Applicants who have had action taken against them for homophobic motivated offences.
- Persistent and offensive verbal abuse or threats of violence to staff or the agents of partner organisations in the Cumbria Choice scheme.
- A combination of persistent behaviours, which while low level in themselves, taken together over time have a serious negative impact on the quality of life for individuals and communities.

Evidence required to support an applicant being ineligible to join the register for reasons of the individual's behaviour/conduct:

- Copy of the Injunction
- Copy of any other Court Order
- Copy of correspondence confirming intention to take further court action after service of Notice seeking possession
- Copy of correspondence to confirm intention to seek possession after service of Notice on an introductory or starter tenancy.
- Copy of suspended or outright possession order
- Copy of ASBO
- Case history of serious unacceptable and/or criminal activity, eg. correspondence, police logs, reports from other statutory or support agencies

- Evidence required where an applicant is ineligible due to wilful damage to a partner organisation's property:
- A report detailing the specific damage to the property
- Photographs of the condition of the property
- Details of the cost of the repairs required to reinstate the property

- Evidence required where an applicant has been violent or threatened violence to a member of staff or agent of a partner organisation:

- A report detailing the incident along with confirmation that it has been reported to the Police
- Evidence of follow up action, for example an injunction

1.4 Customers who have unspent criminal convictions will be treated as ineligible for accommodation where they are guilty of serious offences that would threaten the safety of a local community. The Scheme will liaise with support agencies, the Police and Probation Service to consider the housing options for these customers, where appropriate. Spent convictions will not be taken into account.

1.5 Where a customer's behaviour is deemed to be unacceptable due to a disability the relevant support agencies will be contacted. A decision will then need to be made as to the level of support someone may need to sustain the tenancy. If the level of support is deemed to be sufficient they will be accepted onto the housing register.

1.6 In situations where the customer has been accepted as priority homeless with a duty to re-house but is excluded from the register – these cases will be dealt with by negotiation between the parties outside the Cumbria Choice Scheme.

1.7 Consideration will be given to a customer making a new application if they are able to demonstrate with evidence, that the behaviour which led to the exclusion has changed and that there are no further incidents of serious unacceptable behaviour. The views of any support agency involved with the customer will be sought.

The onus is on the customer to make a new application. Customers can re-apply at any time.

1.8 In cases relating to serious offences or serious anti-social behaviour, periods in prison will not automatically be considered as evidence that unacceptable behaviour has ceased.

1.9 Customers that are ineligible to join the Register will be informed of the decision in writing and will be given the full reason for the decision.

1.10 Customers will be notified of what they need to do to be able to re-apply and where appropriate will be given advice on agencies to contact to assist them with this.

1.11 Customers will be notified of their right to request a review of the decision.

7.4 Appendix 4 - Household Type and Property Size

This table provides guidance on the size of home that different types of household can bid for on Cumbria Choice. This is supplemented by the more detailed information which each housing provider places in individual advertisements and in guidance published on the Cumbria Choice website.

Household	Bedsit	1 bed	2 bed	3 bed	4 bed	5+bed
Single person	🛏	🛏	D	D		
2 Adults (couple)	🛏	🛏	D	D		
2 Adults (non couple)			🛏 *	D		
Single 1 child			🛏	D		
Single 2 child			🛏	🛏		
Single 3 Child				🛏	🛏	
Single 4 or more children				🛏	🛏	🛏
Couple 1 child			🛏	D		
Couple 2 child			🛏	🛏		
Couple 3 child				🛏	🛏	
Couple 4 or more children				🛏	🛏	🛏

* Some providers may only allow households with children to bid on houses

Key

🛏 = Number of bedrooms allowed for this type of household

🛏 = number of bedrooms allowed for this type of household subject to the ages of the children. Two children under the ages of 10 are usually expected to share a bedroom. Two children of the same sex are usually expected to share a bedroom until they are 16. Once a child is 16 a separate bedroom is allowed.

D = allowed by discretion only when stated in the advertisement. This is most likely to apply in one of the following circumstances

- There is low demand for the type of property in the location
- There is lack of supply of smaller homes in the location
- A local lettings or s106 policy applies

NB *Households with access to children will not be able to include them as part of the household when looking at eligibility for property size.*

Cumbria Choice

Choice Based Lettings

Accessibility Policy – May 2012

Section 1
What does the Accessibility Policy aim to achieve?

Cumbria's choice based lettings scheme is designed to give people more choice and control and to encourage as many people as possible to access suitable social housing. Whilst the scheme will allow most people to participate fully giving them an equal chance of finding a home of their choice, some people will need additional help to access the scheme. The duty to provide this help falls on partner organisations as service providers under current Equalities Legislation. It is reasonable to expect that some of those in the highest bands are more likely to need additional help because of the circumstances which have resulted in their higher housing need.

Assistance will be provided with the aim of allowing the customer to make their own choices/decisions. It is important that it does not remove the customer's responsibility and power to control the process.
The intention is to train all staff dealing with enquiries to make appropriate decisions as to the assistance required and to have the knowledge to direct the customer to the most appropriate places to access support. The aim of all advice and assistance is to give the customer the necessary support to make their own decisions about their housing options.

Section 2
Who may need additional help?

The following are groups who may be more likely to need additional help
(This is not an exhaustive list and help will be tailored according to need)

- Older people who have difficulties getting out and about or have become isolated.
- Those with a physical disability.
- Those who have difficulties reading and understanding written information.
- Those with a learning disability
- Those with a mental health problem
- Those who live a chaotic lifestyle due to such things as: substance misuse, homelessness
- Those not currently at home eg in hospital, in the forces, in prison
- Those where English is not their first language

- Young people and care leavers
- Those with family difficulties eg. lone parents, teenage parents, low income families, domestic violence
- Those living in remote rural areas
- Gypsies and travellers
- Those who may feel excluded from services due to for example, sexual orientation

Section 3
What assistance will the members of the partnership provide?

Awareness of Cumbria Choice
The partnership will continue to work to publicise Cumbria Choice – its website and contact details of the individual partners. The ways this will done are detailed below. By using a wide number of means the partnership seeks to ensure all the groups mentioned above can easily be aware of Cumbria Choice as the way of accessing social housing in Cumbria.

Removing barriers to those who may find obtaining and understanding information about available properties and bidding more difficult

1. The full allocations policy will be available to anyone on request. Easy to read guides to the system will be sent to all customers wanting to register on the scheme. This would include a summary guide to the Allocation Policy and a guide to using the scheme e.g. how to register an interest in a property. All these guides will be on the website and the web-based virtual guide to using the scheme will be on the website. All scheme guides will be available on request in other formats, such as large print, on CD and in other languages.

2. The advertisements for properties with adaptations will clearly indicate the adaptations which have been made and the people for whom the property would be suitable.

3. All property adverts will make use of picture symbols to identify the facilities in the properties.

4. The partnership believes using the internet to access Cumbria choice has many advantages and will seek to assist customers to use the internet where possible. However there will also be flexibility to help people who cannot or do not wish to use the internet. Other ways of bidding will be explained clearly to customers. These other methods are:

- Through telephoning any partner organisation office
- Automated bidding (ie the computer system is set up to place an automatic on properties of a type and location specificed by the customer)
- Ringing the low cost automated telephone line
- Through sending a text message
- In person at any partner organisation office
- Through agreement of the use of proxy bidding

5. All information that goes out to customers at every stage will advise about the availability of assistance and will give contact names and numbers. Customers will be advised that they are able to contact any partner organisation office to seek help in completing a registration form, to enquire about properties that are being advertised, to place an interest in a property etc.

6. When customers are contacted at the yearly review stage they will again be asked if they require assistance and will be sent contact details.

7. All partner organisation staff will be given training and regular updates about the scheme and the assistance that will be available. They will be informed and supplied with guidance on the questions they need to ask and the options available to customers eg. Languageline, proxy bidding, posting of individual adverts.

Section 4
How we aim to work effectively with other organisations, including the voluntary sector

- Cumbria choice will maintain a list of stakeholder agencies and will inform them of changes to Cumbria Choice and offer training. They will be supplied with named contact for each partner organisation operating Cumbria Choice in order to resolve any day to day operational difficulties for their clients. Partners organisations will be sent an update on Cumbria choice a minimum of 2 times a year.

- Organisations will be asked if they wish to receive the weekly newssheet of advertised properties and where they do request this, it will be emailed weekly.

- In the event of a difficulty with Cumbria Choice, issues about a specific customer are best discussed with the named contact at Cumbria Choice, or if necessary by following Cumbria Choice's official complaints procedure. In the case of a more general concern about the operation of Cumbria Choice, the organisation may contact the Chair of the Board (currently Lucy Reynolds, South Lakeland District Council) for potential discussion at a Cumbria Choice Board meeting.

Section 5
How can Cumbria Choice offer customers wider housing options information

There are two main ways in which Cumbria Choice will support its customers with housing options advice

1) **It will ensure that customers have access to support from the trained housing officers of the partners who let properties through Cumbria Choice**

- A customer who may have potential difficulties or requiring assistance does not automatically have a high priority for housing and may not be successful in bidding for a property due to high demand.

- Cumbria Choice recognised the importance of helping ensure customers receive appropriate advice to enable him / her to resolve his / her housing situation.

- Where appropriate housing officers from Cumbria Choice organisations will work in liaison with support workers or family members who provide support to the person. Advice would cover areas such as reviewing their housing situation and requirements in conjunction with more 'realistic bidding' choices, the support available, and where appropriate alternative housing options.

2) The Cumbria Choice website will include additional information about alternative housing options and links to further housing advice

- The site will include information to help customers understand the relative popularity of different properties and will include and links to information about other housing options and sources of housing advice.

- The scheme will also be used to advertise properties with private landlords and it is intended to increase the number of private properties advertised over time.

Section 6
How will we monitor that the Accessibility Policy is working?

Cumbria Choice Board receives monitoring information on a quarterly basis
This will include data monitoring by equality groups and will help the Board to identify if any groups appear to be disadvantaged under Cumbria Choice

Reports will be set up showing
The percentage of registrations by Band compared to allocations for groups that may suffer disadvantage under Cumbria Choice
Length of time to make a successful bid by groups that may suffer disadvantage compared with average time to make a successful bid
Numbers of those registered but not bidding groups that may suffer disadvantage compared with the average for those registered but not bidding

The Board will also monitor complaints, appeals and issues raised by stakeholders to identify if any groups are having particular problems with using and accessing housing through Cumbria Choice.

Good practice check list – Cumbria Choice accessibility policy

1. Identifying and supporting applicants who may need additional help

Checklist for officers dealing with applicants	
1. Applicants who tick yes to the question *"Do you require help to use this scheme* *eg. Applying for advertised properties "* to be contacted individually to check what sort of help they need.	
2. Anyone who has contacted for this reason should receive the following help	
a) Explanation of how Cumbria Choice works and bidding options	
b) Reach agreement on a bidding option which is appropriate and acceptable to them	
1. If they do not have internet access suggest someone else can bid for them if this is an acceptable solution for them	
2. They can phone in weekly to be updated on properties available and a Housing Officer can place the bid for them	
3. Newsheets can be posted out for a maximum of 6 months and if interested in a property the applicant can make bids by phone	
4. They can be placed on auto-bidding based on their property / location requirements	

Checklist for landlord organisations	
1. All staff involved with CBL have read and understand the Cumbria Choice Accessibilty Policy.	
2. All staff with contact with CBL applicants should have received training on recognising applicants who may need additional help, the bidding options available and what can be offered to applicants who may find it less easy to access Cumbria Choice online	
3. The annual review letter should again offer the applicant help *(NB are all review letters sent out and returned by post?)*	
4. A report should be run by the organisation at least every 3 months which will allow them to identify people in Band A and B who have not been bidding. The organisation should follow this up to find out why they are not bidding and if they need assistance. In the case of those who are in Band A because of homelessness there will need to be liaison with the Homelessness Team.	

Promoting knowledge of Cumbria Choice as the way to access Social housing and other housing options in Cumbria

The partnership	
1. The partnership will finance advertisements for the Cumbria Choice scheme in a free newspaper in each authority area 3 times a year.	
2. The partnership will ensure that where possible links from other organisations websites are established to the Cumbria Choice website (eg Age UK and other voluntary organisations)	
3. The Cumbria Choice will be developed to include information or links to wider	

housing advice and housing options (eg. Letting agencies, low cost home ownership)	
4. An up to date contact list of organisations which may be supporting customers of Cumbria Choice will be maintained. These organisations will receive twice yearly updates of Cumbria Choice, contact details of officers and the offer of training if required.	
Individual organisations	
1. Each organisation including Local Authorities should ensure they display up to date information on Cumbria Choice in their public areas and that is updated when necessary.	
2. A list of public access points where a Cumbria Choice poster can be displayed should be drawn up. (It is suggested that the largest housing provider in each authority take a lead on this but should be supported by the smaller providers / LA in the area) • Suggested places are: • Supermarkets • Job centres • GP surgeries • Libraries • Citizen advice bureaus	

Monitoring Cumbria Choice

The Partnership	
Statistical reports which help to identify inequality issues will be received by the Board on a quarterly basis as detailed in the Accessibility Policy	
The Board will follow up any issues of accessibility difficulties brought to its attention by individual partners or by stakeholder organisations.	
The Board will require each partner to report annually on its success in carrying out the tasks detailed in this checklist.	

Letting properties in rural settlements, especially those subject to s106 or local lettings policy

(rural settlement is often considered to be one with a population of less than 3000. The good practice points are particularly relevant to places where vacancies are rare ie. less than 5 per year)

Individual officers and landlord organisations	
An advertising board showing the organisations name and Cumbria Choice contact details to be displayed at the property *(when?)*	
Notification of the vacancy is sent to the relevant parish clerks (contact details available on www.calc.org.uk) as soon as the void is notified to the Housing Association including details of when is expected the property will appear on Cumbria Choice	
Restrictions on bidders allowed to apply for the property by size should be avoided (eg an applicant should not be prevented from making a bid on a 3 bed home when they have two children of the same sex under 10). Preferences for the size of the household can be explained in the ad and those not meeting these critieria would be skipped if	

necessary.	
Parish clerks should be contacted to check details of parish boundaries or to verify local connections issues if there is any doubt.	