

# ALLOCATIONS AND LETTINGS POLICY

**EG Approval:** November 2025

**Responsible Board:** Ocean Housing Ltd

**Next Review:** November 2028

**Responsible Executive:** Executive Director Housing & Communities

## 1.0 Background

1.1 This policy sets out how Ocean Housing Ltd (OHL) lets its empty homes, include newly built properties, offering affordable rented homes based on housing need and customer choice to meet legislative, regulatory and local authority requirements. It explains how people may find a home with OHL, the criteria we apply when determining whether someone is eligible for a home and what they can do if they are unhappy with our decision.

1.2 This policy sets out how we will:

- a) Provide affordable rented homes for people in housing need who cannot access market housing
- b) Make best use of our available housing stock and provide opportunities for people to move
- c) Let tenancies which are sustainable in the long term and contribute to stable and balanced communities
- d) Let our homes efficiently, with minimal lost income
- e) Contribute to the fulfilment of Cornwall Council's strategic housing functions and its statutory duties to meet local housing need and homelessness.
- f) Allocate our homes in a fair and transparent way which is easy for our customers to access and understand
- g) Prevent and detect fraud

## 2.0 Purpose and Scope

2.1 This policy encompasses all of our social and affordable housing, including supported and specialist housing.

## 3.0 Legislative and Regulatory Requirements

3.1 The policy has been developed regarding the following legislative and regulatory framework:

- Housing Acts 1985 & 1996
- Homelessness Act 2002

- Equality Act 2010
- General Data Protection Regulation and Data Protection Act 2018
- Human Rights Act 1998
- Localism Act 2011
- Welfare Reform Act 2012
- Immigration Acts 2014 and 2016
- Homelessness Reduction Act 2017
- Homes (Fitness for Human Habitation) Act 2018
- The National Planning Policy Framework 2018 Annexe 2
- The Regulator of Social Housing's Regulatory Standards

#### **4.0 Responsibilities**

- 4.1 The Senior Neighbourhood Services Manager has overall responsibility for this policy including its preparation, oversight of its implementation, and risk management and internal control systems and processes.
- 4.2 The Empty Homes Coordinators and Empty Homes team are responsible for the day-to-day operation of the policy and ensuring it is adhered to.

#### **5.0 How we allocate our homes**

- 5.1 Ocean Housing does not operate a live housing register.
- 5.2 Cornwall Council has nomination rights over many of our homes that become empty, and we allocate a proportion of our homes to applicants who are nominated by the Council in accordance with the nominations agreements we have.
- 5.3 A nomination is a term defined in the Housing Act 1996 as an allocation made in accordance with the allocation scheme of the relevant local authority and is, therefore, governed by the authority's published allocation scheme rather than this policy.
- 5.4 An allocation to a home owned by a registered provider via a nomination is classed as a publicly funded service and, therefore, homes let via a nomination may not be let to someone who has no recourse to public funds regardless of whether there is a Right to Rent.
- 5.5 This restriction does not apply when we let homes outside of the nomination agreement. It is the responsibility of the nominating authority to verify recourse to public funds.
- 5.6 We allocate the majority of our homes through the Cornwall Homechoice choice-based lettings (CBL) scheme, of which we are a partner, whether nomination agreement applies or not. This approach allows those applying for housing with us to best select a home which meets their needs for the long term.
- 5.7 Any allocation will ensure we are compliant with relevant statute, regulation and our charitable objectives.
- 5.8 A small proportion of homes available for re-letting may be allocated through alternative routes.

- 5.9 We may at times have referral agreements with other agencies to directly rehouse and/or support a short or long term need outside of CBL; for example Housing First, which is a scheme where we provide homes for rough sleepers.
- 5.10 Where there is a lower level of demand for our homes, we may use alternative methods of advertising to find a tenant, such as social media or local advertising.
- 5.11 Whichever route is used to apply for a home, including making an application through an approved CBL scheme, applicants will always need to demonstrate they meet our eligibility criteria.

## **6.0 Eligibility**

6.1 To be eligible for one of our homes an applicant must:

- a) Be in housing need and find it difficult to access suitable privately rented housing or to buy a home.
- b) Demonstrate that they can adhere to the obligations of the tenancy.
- c) Show they can afford the rent, taking account of your income, benefit entitlements and financial commitments.
- d) Be willing to accept and engage with support if it is necessary to enable them to sustain the tenancy and afford the rent.
- e) Be suitable for the vacancy in terms of their age, household composition, past tenancy history and any vulnerabilities.
- f) Usually be at least 18 years old. In exceptional circumstances we will let homes to people aged 16 or 17 who are able to demonstrate that the tenancy will be held in trust.
- g) Have the mental capacity to enter into a tenancy agreement and if not, have someone with the relevant Power of Attorney who can support you in making this decision.
- h) Be habitually resident and have the “right to rent” in the UK.
- i) Hold an immigration or settled status that enables you to remain in the UK with a ‘right to rent’ for the duration of the tenancy, in general we will not offer you a tenancy if this is less than 2 years.

## **7.0 Management transfers**

7.1 A management transfer may be agreed where a tenant, or a member of their household:

- a) has been subjected to actual violence where there is a risk this may reoccur

b) has received severe threats of violence and there is evidence those threats will be acted on

7.2 We would usually expect the Police to provide evidence to support a move, but in some circumstances, we may consider evidence supplied by other agencies. To agree a move Ocean would need to be satisfied the risk exists and would be significantly reduced by a transfer.

7.3 Where the risk is so severe an immediate move is needed the tenant must approach Cornwall Council, as Ocean Housing cannot provide emergency housing.

7.4 Management transfers will be granted based on one reasonable offer only, and like for like in terms of bedroom size, unless the applicant wants to downsize. Tenants living in a flat or maisonette will not be offered a house. A tenant living in a house may choose to accept a flat or maisonette.

7.5 The purpose of a management transfer is to move the tenant to a safer home as quickly as possible and the areas they will move to should not be unnecessarily restricted. Decisions on reasonableness will rest with Ocean, and restrictions the applicant wishes to place on the areas they will move to, will need to be supported by evidence.

7.6 Management transfer cases will be reviewed regularly to check if the status remains necessary.

7.7 Permission for a management transfer may only be granted by the Head of Customer Experience & Neighbourhood Services or the Executive Director Housing & Communities.

## **8.0 Work Required to a Property**

8.1 There may be exceptional circumstances where the work required to a property necessitates a move, either temporarily or permanently.

8.2 A move will only be agreed where the work required cannot be carried out with the tenant present. Such work often forms part of a larger programme and if the tenant has to move temporarily, they will only be provided with that accommodation for the duration of the relevant work.

8.3 Alternative accommodation will not be provided for the period of any work that would usually be carried out around a tenant, including kitchen and bathroom replacement unless there are demonstrable extenuating circumstances. Tenants may reasonably be required to make adjustments to their routines to accommodate work.

8.4 Permanent moves will also be considered where it may help manage the impact of a disrepair case

8.5 If we must secure the provision of suitable alternative accommodation, under the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025, commonly referred to as Awaab's Law, we will take into account the needs of the household to assess what is 'suitable'. This could include:

- a) ensuring adequate space for the tenants, including the appropriate number of bedrooms given the family make up
- b) considering the location of the property, including distance from workplaces or schools
- c) considering disability or medical needs to ensure accommodation is accessible
- d) ensuring that the accommodation does not have further hazards or won't lead to further hazards
- e) if the household has pets, considering accommodation that is pet-friendly or can accommodate animals
- f) considering the length of stay, as accommodation that is suitable for a short period may not be suitable for a longer time.

8.6 Provision of alternative accommodation could include accommodation in our housing stock, private rented homes, short-term lets or where more suitable accommodation is not available, hotel and B&B-type accommodation. Suitability will need to be assessed on a case-by-case basis.

8.7 The requirement to secure the provision of suitable alternative accommodation ends if:

- a) the relevant safety work is completed
- b) another investigation concludes that there is no significant or emergency hazard or no relevant safety work
- c) we cannot do the work as we have not been able to secure the necessary consents
- d) the tenants no longer wish to remain in the alternative accommodation, and they give us notice of this in writing

8.8 Permission for either a permanent or temporary move may only be granted by the Head of Customer Experience & Neighbourhood Services or the Executive Director Housing & Communities.

## 9.0 Low demand homes

9.1 On occasion, we are unable to find a suitable new customer through our usual nomination or direct application process. When this happens, we may choose to source a customer via an alternative route. This may include, but not limited to, advertising the property on our website, social media and local advertising.

## 10.0 Supported Housing

10.1 We have a small number of supported housing schemes. For some of our supported housing we have specific referral arrangements with external agencies, for example the local authority or a third sector organisation such as Home Farm Trust Ltd.

## 11.0 Mutual Exchange

- 11.1 Existing customers who wish to move home are advised to seek to find an exchange with another social housing tenant. We subscribe to Home Swapper, a web-based national mobility scheme, through which customers can advertise details about their own home and the type of home and the area they would like to move to. The Home Swapper Scheme is free of charge to OHL customers and offers matching facilities, suggesting potentially suitable exchange partners.
- 11.2 Mutual Exchanges are not lettings. We have a Mutual Exchange Policy which sets out the rules we apply when deciding to approve a mutual exchange application.

## 12.0 Property Eligibility Criteria

- 12.1 When we advertise our homes on Homechoice, or by any other medium, we will make clear any restrictions on who can apply for the property.

## 13.0 Social Sector Size Criteria

- 13.1 We are required by the Regulator of Social Housing to make best use of our available housing. We do this by applying the rules used by the Department for Work and Pensions when calculating what size home, a household is eligible for. This standard is known as the Social Sector Size Criteria (SSSC).
- 13.2 The SSSC allow one bedroom for:
- a) Every adult couple
  - b) Any other adult aged 16 or over
  - c) Any two children of the same sex aged under 16
  - d) Any two children aged under 10
  - e) Any other child
  - f) A carer (or team of carers) who do not live with the customer but who provide overnight care
- 13.3 An extra room may be allowed for foster carers, households with disabled children or if someone in the household is in the armed forces.
- 13.4 Where a member of the household is pregnant, the unborn child will be considered for social size criteria once the household member is 24 weeks pregnant.
- 13.5 When considering whether children form part of the household eligibility for additional bedrooms, we will only consider allowing a bedroom for children where the child benefit is paid to a member of the household applying for housing or where an appropriate court order is in place.
- 13.6 The SSSC is a minimum occupancy requirement, and we may agree to let a home where older children (over 16) or household members of the same gender are required to share a room, providing there would be no breach of statutory overcrowding definitions.
- 13.7 Property eligibility and the assessment of whether a household is overcrowded are different. Having a household where two same gender children share a bedroom does not necessarily constitute overcrowding.

13.8 The SSSC sets out a minimum standard of occupation; we will consider under occupying one of our homes where the property is of low demand, and we have been unable to let the home to capacity via a local authority nomination or through a direct application.

#### **14.0 Adapted Homes**

14.1 We aim to make the best use of homes that have been adapted to meet the requirements of customers with mobility needs. We may do this by advertising a property and stating that priority will be given to customers who require the adaptations. We may seek professional advice from the applicants' Occupational Therapist, or an Occupational Therapist appointed by a local authority, to assess the suitability of a vacant home.

14.2 Where Cornwall Council has no-one suitable on its housing register, we will seek referrals from Adult Social Care or from any other similar organisation that works with households in need of adapted properties.

#### **15.0 Designated Older Persons Accommodation (aged over 55)**

15.1 Some of our accommodation has minimum age requirements. Where this is the case, we will make this clear on nomination requests or advertisements.

15.2 Two-bedroom bungalows will be let to households that need two bedrooms. This could be a couple who are unable to share a bedroom for medical reasons or a single person who requires an overnight carer. We may agree to under-occupy a two-bedroom bungalow where there is no demand from anyone in need of two bedrooms.

#### **16.0 Section 106 Requirements**

16.1 Some of our homes were built with planning permission that had conditions attached to it. Where this is the case, this is known as a Section 106 site, which refers to the section in the relevant legislation. These requirements are site specific and will override any aspects of this policy that may conflict with them.

16.2 The most common features of a S106 agreement relate to the requirement for us to seek nominations from Cornwall Council and to restrict eligibility for the homes to those with an established local connection to the area.

16.3 A local connection to Cornwall will be established if:

- a) The applicant lives in Cornwall and has done so continuously for the last three years, and that residence was of their choice. (NB residence in a hospital or prison does not form a local connection by residence)
- b) The applicant has lived in Cornwall continuously for 5 years at some stage in the past
- c) The applicant is employed in permanent employment in Cornwall (permanent employment is regarded as 16 hours or more per week for a continuous period of three years. NB This must be their actual place of work, not where their head office is situated).

- d) The applicant has close family (normally mother, father, brother, sister, son or daughter) that have resided in the area for at least the past five years.
- e) The applicant meets the criteria under an additional preference category, for example, fleeing domestic abuse, current or former armed service personnel, right to move and witness relocation.
- f) The applicant is a Cornwall care leaver and does not meet minimum local connection criteria.
- g) Exceptional circumstances – where there is an exceptional need to move to Cornwall. Examples include but not limited to:
  - i. Those needing to move closer to specialist medical/support facilities
  - ii. Applicants accepted as homeless and owed a full housing duty by Cornwall Council
  - iii. Homeowners requiring adaptations that cannot be undertaken within their current home
  - iv. Cornwall care leavers living outside of the County

16.4 The local connection requirements can vary from site to site, but we will make clear the requirements in all advertisements for homes affected by a S106.

## **17.0 New Build Homes**

17.1 Where a new development is subject to planning constraints, such as a S106 agreement or where we have received funding to assist in developing new homes, there is a requirement for all first lets of the new homes to be offered to Cornwall Council for nominations from its housing register.

17.2 Occasionally we may have an agreement with Cornwall Council to house some of our existing tenants into the new homes where they are affected by demolition or regeneration plans or where they used to live on the site and an agreement was made that they would be able to return to a suitable home on the new development.

## **18.0 Local Lettings Plans**

18.1 We occasionally develop a Local Lettings Plan with Cornwall Council for new developments and for existing housing schemes within a locality.

18.2 We will endeavour to create communities where new and existing tenants can thrive. We will do this by understanding the needs of the local community and the demand for homes. We will do what we can do to help address any challenges by working closely with external partners and agencies to influence change.

18.3 Local Lettings Plans will be time limited and reviewed periodically to make sure they are achieving the stated aims.

## **19.0 Verification**

19.1 We want to get our relationship with our prospective tenants off to the best start and to ensure that the offer of a home is the right step for them. This involves getting to know prospective tenants, ensuring they are ready to move and making sure the property they are being considered for suits their needs.

19.2 To do this, we ask customers to:

- a) Complete a customer questionnaire online or by telephone
- b) Agree to us carrying out any appropriate checks such as credit checks and home ownership searches
- c) Provide us with clear income and expenditure details, including showing us bank statements
- d) Agree to pay rent by Direct Debit or an alternative payment method agreed with the Empty Home Coordinator
- e) Provide proof of identity for all household members and evidence that household members over the age of 18 have the Right to Rent
- f) Provide proof of National Insurance number for the applicant and joint applicant
- g) Provide references or contact details from previous landlords or agencies that they are working with
- h) Provide evidence of Local Connection criteria if applicable

19.3 Failure to provide this information within three working days, will result in the application being rejected, unless there is an exceptional reason for the delay.

19.4 Where prospective tenants have difficulty with any of the above due to support needs, language barriers or lack of internet access, we will offer reasonable assistance to them.

## **20.0 Deciding not to offer a home to a customer**

20.1 There will be occasions when we decide that we are unable to offer a home to an applicant because the property in question is not suitable or because the prospective tenant is not suitable, or ready, for housing with us.

20.2 We will consider the prospective tenant's individual circumstance before making any decisions and each one will be based on its own merits. However, if we decide not to offer a home we will explain our reasons clearly, as well as what they need to do to be re-considered in future. We will confirm our decision in writing.

20.3 A decision not to offer a home may be recommended by an Empty Homes Coordinator and will be subject to approval by the Senior Neighbourhood Services Manager.

20.4 Any rejection of a nomination will be confirmed with the Council.

20.5 Where an applicant has refused three reasonable offers without reasonable explanation, we will not consider any further nominations for a period of 12 months.

20.6 The list below is not exhaustive and provides examples of what we consider when making our decision to offer.

20.7 **Affordability** - Both new and transferring tenants will be required to demonstrate that the proposed new tenancy will be sustainable and that they can afford to pay the rent

and service charges.

- 20.8 With all prospective tenants we will carry out a credit check or affordability assessment on the applicant and joint applicant to help us in our decision making. For existing tenants moving to another Ocean home, we may carry out a credit check where necessary. The purpose of a credit check is to gather information about a household's current financial circumstances and to highlight any unmanaged debt that may impact future rent payments. In a scenario of unmanaged debt, we will encourage the household to seek advice and assistance, coming to payment arrangements with creditors.
- 20.9 If the level of unmanaged debt is such that it would impact the ability to pay rent, we may decide not to offer a home at that time. We will advise a customer refused housing on the grounds of affordability of the steps they need to take before applying to be considered for housing with us again.
- 20.10 During the verification process, the Empty Homes Coordinator will carry out a detailed income and expenditure assessment based on estimated expenditure in the new home. The Empty Homes Coordinator will also discuss the amount of rent to be paid at the time of signing for the tenancy.
- 20.11 We expect a minimum of 4 weeks' rent to be paid at sign up and future payments to be made by direct debit. Where paying 4 weeks' rent at sign up would cause significant hardship for the household, the Empty Homes Coordinator will require a minimum payment of 1 weeks rent and will explore alternative options with the customer to address the shortfall through an application for Discretionary Housing Payment (DHP) or a payment plan to bring the rent account into 4 weeks' rent credit.
- 20.12 We may refuse to offer a home or to reject a nomination if the household would have insufficient money left to live on after housing costs are paid.
- 20.13 We may refuse to offer a home or to reject a nomination if a household has agreed with the Empty Homes Coordinator to pay a sum at sign up and then fails to do so without exceptional or extenuating circumstances.
- 20.14 **Anti-Social or Unacceptable Behaviour** - If any of the following apply to an applicant or a member of the household and we consider that the letting or allocation of housing would be detrimental to neighbours or the local community, we may reject a nomination or application
- 20.15 When making our decision we will consider all relevant circumstances, and we will examine the strength of the evidence against the household. We will gather evidence and information from all available sources including, but not limited to, Probation Officers, Social Workers, Support Workers, the Police and previous landlords.
- 20.16 An unspent conviction will not result in an automatic rejection, as each case will be considered on its merits, taking all circumstances into account.
- 20.17 We may decide not to offer a customer a home due to anti-social behaviour if (but not limited to):
- a) There are unspent convictions for offences that would make them unsuitable to be a tenant. All unspent convictions must be declared by the prospective tenant at telephone interview. If we later discover that information of this nature was withheld, we may also decide to not to offer a home or, if already offered, take

appropriate action to repossess the home. Examples of convictions that may make someone unsuitable to be a tenant include assault, causing damage to property, burglary, handling stolen goods, carrying offensive weapons, drugs offences and keeping dangerous dogs. These are stated for illustrative purposes and not intended to be an exhaustive list.

- b) The applicant or a household member has been evicted or had a possession order (suspended or outright) or an injunction made against them for anti-social behaviour, including harassment, intimidation, domestic violence whilst a tenant with a previous landlord and there is no evidence that the applicant has engaged with support services and/or there has been an insufficient passage of time to demonstrate a change in behaviour.
- c) The applicant or a household member has been verbally or physically abusive towards any OHL colleague or any other person whilst a tenant with Ocean or during the lettings process.
- d) The applicant or member of the household, or guests or visitors to a previous home, have perpetrated anti-social behaviour, harassment, domestic violence or other unacceptable behaviour including causing a nuisance or annoyance to neighbours and had tenancy enforcement action taken against them.

20.18 **Housing Related Debt** - If an applicant or joint applicant has any housing related arrears, for example: rent or mortgage arrears, Housing Benefit Overpayments, service charge arrears, rechargeable repairs charges, court costs or any other arrears owed to a landlord, OHL will take this into account when determining whether to offer a home. We will not make an offer of housing where someone:

a) has outstanding housing related arrears and no payment plan is in place

or

b) where a plan is in place but has not been maintained for a minimum of 6 months owes any arrears to OHL

20.19 Where an existing OHL customer is in housing arrears as a result of the impact of welfare reform (such as through an under occupancy charge, a shortfall in housing benefit payments due to the local housing allowance cap or the benefit cap for families with children) and if rehousing would ameliorate their financial circumstances and present an opportunity to repay the debts, this will be taken into account when deciding whether to offer a home.

20.20 Any decision not to offer a home to an applicant or nomination due to housing related arrears will be communicated in writing along with the steps that should be taken before being able to be considered again for rehousing with Ocean.

20.21 **Property condition and allowing access** - As part of the Letting process, for existing Ocean tenants, we will carry out a Pre-void Inspection at the tenants' existing home. Where it is evident the applicant has caused damage to the property or not reporting repairs to maintain their home, or the applicant is hoarding for example, we will review these cases to see if there are any potential tenancy breaches or safeguarding concerns. OHL may decide not to proceed with the application if we feel that the applicant needs to resolve these issues to evidence that they can maintain a property in satisfactory manner.

- 20.22 Where there are safeguarding concerns not addressed, OHL will discuss these cases with relevant agencies where appropriate to decide the best course of action.
- 20.23 Where concerns are raised that an applicant has not allowed access for required landlord safety checks or property inspections we may decide not to continue with their application if we feel the applicant is not demonstrating engagement and allowing access for compliance with required landlord safety checks.
- 20.24 **High-risk offenders subject to Multi-Agency Public Protection Arrangements (MAPPA)** As part of our statutory duty to assist the local authority, OHL may consider housing a sex offender or a prolific offender via a nomination.
- 20.25 OHL aims to create safe, secure and sustainable communities and will have regard to the best interests of existing customers in the community. We may restrict offers of housing that are considered to be inappropriate based on information gained via a risk or support needs assessment.
- 20.26 We will work with relevant agencies to make a full assessment and carefully consider any risks before deciding to offer a home to a sex offender or any other offender subject to MAPPA arrangements. The final decision not to offer a particular home will be made by the Head of Customer Experience and Neighbourhood Services.
- 20.27 **Existing Customers Transferring** - We will not normally offer a home to an existing customer until they have lived in their current home for at least 12 months.
- 20.28 We will not agree to transfer an existing customer who has caused damage or not maintained their current home to at least an acceptable standard, or if there are current breaches of their tenancy conditions.
- 20.29 Any customer selected for consideration for an offer whether by nomination from the local authority or by direct application to OHL will be subject to an inspection of the current home and must not owe any arrears to OHL.
- 20.30 **Immigration status** - We are required by law to ensure that everyone aged 18 or over in a household has the Right to Rent a home in the UK. We will verify the Right to Rent at the application stage. We will ensure every adult over 18 has the legal right to rent or live in one of our homes.
- 20.31 The Right to Rent is distinct from having no recourse to public funds. If a customer has no recourse to public funds and is nominated to us by the local authority, we will reject the nomination and return it to the local authority since housing via a nomination is classed a publicly funded service. If a joint application has been made and one of the applicants has no recourse to public funds, we may still agree to house the household as long as one applicant has both recourse to public funds and the right to rent in the UK.
- 20.32 **Sufficient Financial Means, Assets and Home Ownership** - We will not normally consider offering a home to someone who owns a property in the UK or abroad or to someone who has sufficient income or assets to be able to rent or buy a home on the open market.
- a) Applicant(s) households with net realisable assets of £50,000 or more.
- b) Applicant(s) households with a net income of £60,000 or more.

- 20.33 Consideration will be given for homeowners who are unable to access housing in the private sector for example:
- a) They are in negative equity and/or repossession proceedings are in place.
  - b) They have a medical condition or disability which requires substantial adaptations to their property which cannot be made in their current home or in the private sector and social housing is the only realistic option
  - c) They have a specific care need or require specialist support
  - d) The local authority has accepted a duty due to, for example fleeing domestic violence. We will need to see that steps are in place to remove their interests from the property
- 20.34 We may carry out Land Registry and Credit checks and any other sources of information available to us to establish current or previous property ownership.
- 20.35 **Availability of appropriate support** - We will only offer a home to vulnerable people where adequate support arrangements are in place. We will work with agencies to ensure the required support is in place before making the final decision.
- 20.36 We will not offer a home where the customer refuses to or has demonstrated that they are unlikely to engage with any support that is put in place.
- 20.37 **Minors (aged under 18 year)** - Anyone under 18 cannot legally hold a tenancy.
- 20.22 We will only offer accommodation to under 18s, aged 16 years or over, if the tenancy is held in trust by a recognised agency or a friend or relative who can sign as guarantor, and the customer has relevant support in place.
- 20.38 A guarantor will be required to complete affordability checks to evidence they can meet the obligations on behalf of the minor. We will work with the local authority where they have a corporate parenting duty to assist in the housing of Care Leavers.

## **21.0 OHL employees and their relatives**

- 21.1 The Executive Director Housing & Communities or a delegated senior colleague must authorise offers of housing to existing or former employees, their close relatives, or Non-Executive Directors regardless of the source of the application.

## **22.0 Fraudulent Applications or Withholding Information**

- 22.1 Social housing is a valuable and scarce resource. We aim to ensure that our homes go to those who are eligible for a social housing tenancy. We will not tolerate those who seek to defraud the system by obtaining a home for which they are not eligible or for personal gain such as subletting. Nor will we allow anyone to hold more than one tenancy within the social housing sector.
- 22.2 Social housing fraud is a criminal offence. Anyone found to have deliberately lied, provided false information or withheld information as part of an application will not be accepted as an eligible applicant by us.
- 22.3 A tenancy obtained by deception will be subject to repossession action and possible criminal prosecution. If we discover any deception at application or offer stage, we will

cancel the application or withdraw the offer. Any other interested parties such as the local authority will be notified by us.

## **23.0 Appeals**

- 23.1 Rejected applicants can appeal against our decision not to accept an application or not to offer them a home, if they feel we have not considered all relevant information or have made the decision unfairly.
- 23.2 Appeals must be made in writing within 10 working days from the date of notification of decision not to accept an application or a decision not to make an offer. We will not hold a home empty whilst an appeal is being considered. If the appeal is successful, we will seek to offer a suitable alternative property.
- 23.3 The Senior Neighbourhood Services Manager or another more senior manager not involved in the original decision will consider any appeals.
- 23.4 Customers will be notified of the appeal decision within 10 working days.

## **24.0 Equality, Diversity and Inclusion**

- 24.1 In operating this policy OHL will have regard throughout to its obligations under the Equality Act 2010 not to discriminate against any person with a protected characteristic whether directly or indirectly and to comply with our duties under the public sector equality duty to have had due regard to the need to eliminate discrimination, harassment, victimisation, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 24.2 OHL values equality and diversity. We will encourage a culture that challenges prejudicial behaviours and breaks down barriers to opportunities. We will ensure that our approach to equality and diversity is incorporated in all aspects of our business and the services we provide including application of this policy.
- 24.3 This means that where applicants face difficulties accessing services because of a vulnerability or disability or other protected characteristic we will take reasonable steps to ensure they can access the service. Reasonable Adjustments, under the Equality Act 2010, will be considered on a case-by case basis.
- 24.4 We are committed to addressing any communication or language barriers by providing translation services for face-to-face contact and written communication when needed. We will also produce information in alternative formats such as audio or large print where required.

## **25.0 Monitoring and Review**

- 25.1 We will monitor this policy to ensure it meets good practice and current legislation and will review it in accordance with our review timetable for all policies.