



# Allocations Policy

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<b>Document Control</b>	
Document Title	Allocations Policy
Author	Director of Housing Management
Version	V3.0
Release Date	April 2026
Next Review Date	April 2029
Document Type	Policy
Approved By	Board October 2024

## POLICY SUMMARY

**Please note that where we use EPIC within this policy, we refer to EPIC Limited.**

This policy sets out how EPIC will allocate properties and prioritise housing applicants. A key driver for the policy is to ensure that housing allocations support the creation of sustainable communities, whilst taking account of the needs of both existing tenants and new applicants.

### 1. APPLICABILITY

The Policy applies to:

- Tenants
- Applicants

### 2. INTRODUCTION

- 2.1. EPIC's Allocations Policy is underpinned by our organisational vision to empower our tenants with the resources and support they need to thrive, while also making a positive impact on the wider community.
- 2.2. EPIC will work alongside other partner agencies and organisations as appropriate to help in achieving this vision. We acknowledge that we have a role to play in assisting our Local Authority partners in meeting homelessness and wider duties to those in housing need and fully participate in the nominations agreement (where in place) between our respective organisations.
- 2.3. This policy is intended to ensure that people who need housing are given the appropriate priority, and homes are allocated to those in greatest need.

### 3. CONTEXT

Our Allocations Policy is set within the current political and regulatory framework.

- 3.1. Allocation of Accommodation: Guidance for Local Housing Authorities in England:  
The statutory guidance encourages authorities to make use of the existing flexibilities within the allocation legislation to ensure that homes go to people with the greatest housing need. The guidance suggests that authorities should assist serving/former members of the armed forces, households in work or seeking work, carers and prospective adopters and foster carers when setting their allocation schemes.
- 3.2. We keep up to date with statutory guidance and are committed to working closely with our key local authority partners to ensure that we can work together to meet the housing needs in the areas in which we operate. We will set aside 50% of our vacant properties for nominations from Stoke on Trent City Council, applying the nominations agreement. Acceptance onto the waiting list, reasonable preference waiting time and property eligibility will apply as normal to applicants seeking housing via nomination.

### 4. STATEMENT OF INTENT

- 4.1. To provide the best possible service to our tenants and future tenants and to efficiently administer the allocations process, we manage access to our waiting list. In practice this means:
  - Applicants who have submitted the required documentation are assessed and placed on a Housing Waiting List firstly in a Band, based on their housing need, and secondly in date order.
  - To effectively manage expectation and to meet demand, there may be times that EPIC will make a decision to suspend the housing waiting list.

## **5. AIMS AND OBJECTIVES**

### **5.1 We aim to:**

- Match applicants for housing to suitable homes that we have available for letting in a timely, open, and transparent way.
- Create a balanced and sustainable community across the key areas in which we work.
- Create sustainable lettings in homes that meet applicants' needs.
- Ensure we have in place appropriate checks to prevent fraud.
- Ensure housing is allocated to people in housing need and balance the needs of applicants alongside the rights of the existing community for quiet enjoyment of their homes.
- Work closely with local authorities in the areas in which we operate to meet local housing priorities.
- Be accountable to applicants by providing clear information about our decisions.
- Make best use of our housing stock.

## **6. CHARITABLE STATUS**

6.1. We have charitable status and let properties according to the objectives of the association. A charitable beneficiary is someone in receipt of welfare benefits or on a low income, older people, people with disabilities, those who have a long-term physical or mental illness or people in other recognised charitable need.

6.2. Our charitable objectives mean that we must give priority to housing people on low incomes who would otherwise struggle to obtain affordable accommodation within the private housing sector. Low income means that an applicant's income is no more than 90% of the West Midlands average, which can be found at [www.nomisweb.co.uk](http://www.nomisweb.co.uk)

## **7. LOCAL LETTINGS PLANS**

7.1. We are committed to working in partnership with local authorities to develop local lettings plans where needed, and to improve or maintain the sustainability of the communities in which we operate. Plans are unique to the circumstances of the individual area and are reviewed on an ongoing basis.

7.2. We will establish local lettings plans if and when appropriate and ensure that they do not result in tenants being adversely affected by them, by monitoring them where they exist on an annual basis or sooner if required.

## **8. CONNECTION TO EPIC**

8.1. We will not offer any unfair advantage to applicants who are employed by EPIC, their relatives, members of the Board of Directors, their relatives and anyone who has been employed or on the Board in the previous 12 months.

8.2. For openness and transparency, we will obtain Executive Team approval prior to any granting of a tenancy to any person in the above categories, and such approval will be noted in our records.

## **9. ACCESS TO THE REGISTER AND ONLINE APPLICATION**

9.1. All applicants will be directed to apply online via our Online Application Form. Our website will detail where we have properties located. Where an applicant has specific difficulty accessing the online process, we will provide support to complete a paper-based form, including support to current and new applicants where English is not their first language.

9.2. An assessment of the application will take place; we can only accept fully completed applications. New applicants will be asked to provide landlord references for all tenancies held by the applicant for the previous five years.

9.3. We will carry out an annual review of applications on the waiting list to validate their continued interest and demand.

- 9.4. People who are subject to immigration control and who are not eligible for housing under the Allocation of Housing Regulations 2002 cannot be housed. We will ensure this policy complies with the requirement of the Immigration Act 2014 for landlords to only allocate a property to those who have a 'right to rent'.
- 9.5. Applicants must be able to demonstrate that they will be financially able to meet their commitments. The applicant will be required to go through a series of assessments to determine their financial status. This will include an income and expenditure check, details of any existing debts and loans, arrears owed to a former landlord, any benefit overpayments and current or future restrictions to benefits.
- 9.6. Any outstanding rent arrears or housing-related debt must be cleared before the applicant is accepted onto the waiting list and eligible for offers of accommodation.
- 9.7. Applicants must commit to paying 4 weeks' rent in advance when signing for a tenancy.

**10. PROPERTY ELIGIBILITY**

- 10.1. Applicants who applied for housing under Version 1 and 2 of previous versions of the Allocations Policy will:
  - have their property eligibility reviewed;
  - have their application placed in one of 3 bands based on priority need; and
  - be notified of the band into which their application has been placed.
- 10.2 Applicants, regardless of when joining the waiting list, will only be considered for properties that meet their housing need. Where there is no demand for a vacant property due to size, the property will be managed under Low Demand. Applicants will not be allocated accommodation larger than that required to meet their needs where there is the potential for affordability and tenancy sustainment issues.

<b>Number of People</b>	<b>Bedroom Entitlement</b>
Single	1
Couple	1
2 adults not living together as a couple	2
Family (1 or 2 parent) with 1 child	2
Family (1 or 2 parent) with 2 children under 10 years of age	2
Family (1 or 2 parent) with 2 children aged 10 to 15 of the same gender	2
Family (1 or 2 parent) with 2 children aged 10 to 15 of different gender	3
Family (1 or 2 parent) with 3 or more children	3 or 4*

\*subject to availability

NB: An extra bedroom is required for each person aged 16 or over unless they are living together as partners.

- 10.3 We will consider the following special circumstances when determining the number of bedrooms required, subject to suitable proof from the applicant:
  - Pregnancy – where the applicant, or a person who would be expected to reside with the applicant, is 3 months or more pregnant the household will be treated as if the child is already born.

- Access to children (shared parental care)– we will require proof of receipt of Child Benefit before a child or children can be taken into account when considering property size.
- Foster children – where the applicant accommodates foster children on a long-term basis (for a period of more than 6 consecutive weeks at a time), we will assess bedroom requirements as if the child or children are living within the household on a permanent basis.
- Adoption – where the applicant, or a person who would be expected to reside with the applicant, is nearing completion of the adoption process in the UK and has been accepted as a suitable adopter.
- Where an applicant requires regular overnight care and receives one of the following benefits, we will take the requirement for an additional bedroom into account:
  - the care component of disability living allowance at the middle or highest rate;
  - attendance allowance; or
  - the daily living component of personal independence payment.

## 11. THE BANDING SCHEME

- 11.1. EPIC will retain 50% of its empty properties to assist the council in meeting its statutory duties.
- 11.2. The Housing Act 1996, as amended, states that when determining priorities under the Allocations Policy, reasonable preference is given to certain categories of people. To ensure that the council achieves its statutory duties, it has a policy that is structured to ensure that households in certain specific types of housing need have a degree of priority over others.
- 11.3. This currently includes those:
- who are homeless;
  - whom the local authority has a duty to accommodate;
  - occupying insanitary, overcrowded or unsatisfactory housing conditions;
  - who need to move due to medical or welfare grounds; or
  - who need to move to a particular locality to reduce hardship.
- 11.4. All qualifying households are placed into one of three bands. Those households placed into Band One have the most urgent housing need.
- 11.5. Those in Band Two have been identified as having a higher housing need than those in Band Three.
- 11.6. Applicants placed in Band 3 will not have an urgent housing need and do not fit the criteria for Band one or two.
- 11.7. Within a band, subsequent priority is determined by the date the application was placed in that band, with the person who has been waiting the longest within that band having the highest priority.
- 11.8. If circumstances change which results in an applicant moving to a higher priority band, the band date applies from the date the application is given the higher priority, not the original date of the application.
- 11.9. If circumstances change which results in an applicant moving to a lower priority band, the date for the lower band will be treated as the date they joined the waiting list.
- 11.10. A household will be placed in the highest band that any member of that household qualifies for. There is no additional recognition of multiple needs within a household.

Band One	<ul style="list-style-type: none"> <li>a. EPIC tenants who are currently under-occupying their home by 2 or more bedrooms and prepared to move to 1- or 2-bedroom accommodation in accordance with their assessed need.</li> <li>b. Tenants occupying a purpose-built wheelchair or specially adapted property who no longer require it.</li> <li>c. Tenants who need to move for management reasons. This may be because of threats of violence or traumatic event for example.</li> </ul>
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	<p>d. Tenants whose current housing conditions are having a seriously adverse effect on the physical or mental health of either the applicant or a member of their household.</p> <p>e. People who are owed a statutory homeless duty under the Housing Act 1996 (Part VII), as amended by the Homelessness Reduction Act and meet additional criteria (see 4.21) via a Nomination where an agreement exists with the Local Authority.</p> <p>f. Tenants whose homes are assessed as being statutorily or critically overcrowded.</p>
Band Two	<p>a. Tenants whose homes are deemed to be severely overcrowded (two bedrooms or more short of their assessed need).</p> <p>b. Applicants who are overcrowded by one bedroom in accordance with their assessed need.</p> <p>c. Tenants who are currently under-occupying a 3 or more-bedroom property by 1 bedroom.</p> <p>d. People whose current housing conditions are having a negative effect on the physical or mental health of the applicant or a member of their household.</p> <p>e. People leaving the armed forces who have applied for housing within 5 years of their discharge but do not have a home to return to.</p> <p>f. Non-tenants living in overcrowded circumstances.</p>
Band Three	<p>a. Applicants who do not meet any of the above criteria.</p>

## 12. IDENTITY CHECKS

- 12.1. Applicants will be advised to submit proof of identity along with the application form. An applicant that refuses to provide any relevant checks and/or provides false information will have their application refused. Applications will not be accepted where information is missing.
- 12.2 We ask each applicant and member of the household aged 18 or over to provide documentary evidence (as noted at 12.4). Copies should be attached to the online application form and will be verified before any tenancy sign-up.
- 12.3 For properties that we let directly (not via a nomination), we will verify each adult's identity in conjunction with the government's Right to Rent Scheme. If the applicant is not a British or Irish citizen, they can usually get a share code to prove their right to rent. We can use this share code to check if they can rent and how long for. If we need a share code, we will ask for one. To view and prove immigration status, share codes can be obtained by visiting [www.gov.uk/view-prove-immigration-status](http://www.gov.uk/view-prove-immigration-status)
- 12.4 We will require:
- Two proofs of current address dated within the last 3 months.
  - A joint applicant living at the same address only needs to provide one additional proof of address.
  - The proofs of address should be for where an applicant is living for most of the time. A care-of address, which is different to the address that an applicant is living at, can only be accepted by exception from the Director of Housing Management due to the potential for fraud. Where an applicant has no permanent address, further checks must be undertaken.
  - One proof of identity for nominees from the council. Wherever possible photographic identity should be provided (e.g., Passport, Driving Licence, Work Identity Card, Proof of Age Card, National Identity Card).
  - Where photographic identity is not available, a birth certificate, bank statement or old-style paper driving licence is acceptable; however, a photograph of the applicant(s) is required for fraud prevention purposes where photographic identity is unavailable.

- For direct applicants, without a passport or identity card, two proofs of identity are required in accordance with the Right to Rent checklist published by the government.
- Proof of National Insurance Number.
- Proof of income or benefit entitlement.
- Proof of residency and/or right to remain in the UK where applicable.
- Proof of pregnancy (if applicable).
- Children’s birth certificates or proof of Child Benefit entitlement.
- Details of all landlords over a five-year period.
- Any other information relevant to processing an individual’s application for housing, including details of any illnesses.
- Proof of landlord details for applicants who are privately renting (copy of tenancy agreement, rent book or similar).

### 13. FURTHER IDENTITY CHECKS

- 13.1. If there is any doubt about the applicant’s identity or address details arising from the home visit, EPIC staff will undertake further checks to ascertain the authenticity of the application. Such checks can include:
- 13.1.1. Contacting the local authority to see if the applicant is on the electoral register for their stated address. Further checks with their landlord where an applicant is living in rented property.
  - 13.1.2. Checks with the applicant’s employer.
  - 13.1.3. Where the visiting officer believes that external housing-related support is necessary for the applicant to sustain a tenancy, EPIC requires agreement from an appropriate support agency before the application is accepted.

### 14. EXCLUSIONS

Applicants may be excluded from EPIC’s waiting list in the following circumstances:

- 14.1. Where the applicant is aged under 18. However, EPIC will consider applicants aged 16 or 17 who are defined as vulnerable, where the local authority has a legal duty to rehouse them and there is a leaving-care package of required support in place and they are able to provide a Trustee and guarantor to cover compliance with the terms and conditions of the tenancy agreement, known as an “Equitable Agreement”.
- 14.2. Applicants who are not considered able to hold a tenancy without appropriate support and where this support is not available, or the applicant is unwilling to accept such support.
- 14.3. Anti-Social Behaviour: If the applicant, or any member of their household, has been evicted for anti-social behaviour or breach of tenancy, or has a current harassment or non-molestation order, an Injunction Notice of Seeking Possession, or any other Court Order against them, which makes them currently unsuitable to be a tenant, will usually mean that they are ineligible for housing.
- 14.4. Applicants owing rent arrears with no repayment plan in place or a repayment plan in place with arrears equivalent to four or more weeks of the amount the tenant is liable to pay directly still outstanding.
- 14.5. Applicants who have failed to conduct a current or previous tenancy or licence in a satisfactory manner.
- 14.6. Applicants who knowingly withhold or give false information. It is a criminal offence for applicants and/or anyone providing information that we use to process an application or an offer of accommodation to make false statements or knowingly to withhold requested information relevant to their application (section 171, Housing Act 1996). This includes, but is not limited to, information requested on the housing registration form, in response to correspondence at the renewal of the application or relating to any other review of the

application. An offence is also committed if a third party provides false information whether or not on the instigation of the applicant. Ground 5 in Schedule 2 to the Housing Act 1985 (as amended by the 1996 Act, section 146) enables the landlord to seek possession of a property where it has been granted as a result of a false statement by either the tenant or a person acting at the tenant's instigation. We will work with and notify partner agencies where applicable if this is the case.

- 14.7. Anyone who has damaged property from a former tenancy and has not remedied or agreed to remedy the damage, will have their application declined.
- 14.8. Applicants who have savings and/or equity in a property that exceed the level used by the government to exclude a person from any unemployment-related benefit.
- 14.9. Where the applicant already owns a property elsewhere, either in this country or abroad. We can consider applications where the property is being sold (subject to our savings/equity limits), or where the applicant does not have access to their property because of a relationship breakdown or similar situation.
- 14.10. Where the applicant's household income is above the regional average. The regional average wage can be found by consulting [www.nomisweb.co.uk](http://www.nomisweb.co.uk)
- 14.11. Subject to the provisions of the Rehabilitation of Offenders Act 1974, persons convicted of a criminal offence where the nature and circumstances of the crime were such that it is considered that they may not be able to properly conduct a tenancy.
- 14.12. An applicant may be excluded where they have a criminal conviction that has not been spent and if the nature and circumstance of the offence indicates a potential risk to the residential community or staff members. This is not an exhaustive list, and other related offences may be taken into account.
  - Murder or attempted murder.
  - An offence specified within Schedule 1 of the Sexual Offences Act 1997.
  - An offence including damage to property belonging to another person or arson.
  - Racially motivated or aggravated offences.
  - An offence involving domestic violence. Individuals who have been violent or aggressive to an employee, another landlord or local authority are likely to have their application refused. This is taken as an actual physical attack, serious verbal abuse or intimidating behaviour which has warranted a referral to the police and/or has required an incident report to be completed.
- 14.13. The above are not blanket exclusions and we will always consider individual circumstances before making a final decision on whether to accept an application onto the waiting list. We will inform applicants about any decisions that relate to the priority or eligibility of their application. Applicants excluded from our waiting list must wait a minimum of 12 months before they can reapply for housing. The only exception to this is where an applicant was excluded for rent arrears of less than £300 and there is documentary evidence that the arrears have subsequently been cleared in full. In such cases the applicant can reapply immediately for housing.

## **15. REJECTION OF APPLICATIONS AND THE RIGHT OF APPEAL**

- 15.1. EPIC is committed to letting our homes in a fair and transparent manner. We will judge each case on an individual basis and make every effort to resolve any ineligibility.
- 15.2. Where we reject an application, this will be explained clearly in writing, including the reasons for the decision. We will also provide details of our appeals process and signpost the applicant to housing advice for further support in relation to their housing situation.
- 15.3. Where an applicant who has been 'nominated' is refused, we will always update the relevant local authority.

## **16. REVIEWING AND CANCELLING APPLICATIONS**

- 16.1. An annual review of waiting-list applicants will be carried out.
- 16.2. Applications will only be accepted from applicants who provide all the necessary supporting documentation with their application.
- 16.3. We will notify those who have failed due to missing documentation. If there is no response within 7 days their application will be cancelled. Applicants who reject 2 offers of accommodation from us will have their application cancelled from the waiting list but are able to re-apply after 6 months if they still wish to be housed by us.

## **17. OFFERING PROPERTIES**

- 17.1. We want to ensure that applicants have the maximum amount of notice possible of a vacancy. This allows applicants time to plan their move and provides them with an adequate timeframe to provide notice to their current landlord where applicable.
- 17.2. Properties will be offered in strict band and date order and can only be overridden in the following circumstances:
  - 17.2.1. Where adapted housing is provided, and the disabled person moves or dies, and the adapted housing is no longer needed by the remaining household, we will consult with the household to consider alternative housing options. These allocations will be outside normal allocation routes and will be authorised by a member of the Executive Team. Where suitable alternative accommodation is offered and refused, we may seek to recover possession of the property by using Ground 9 of Schedule 2 of the Housing Act 1988.
- 17.3. The applicant will normally be offered 24 hours to respond to the offer to view a property unless there are mitigating circumstances to extend this time limit for example where an adapted property would benefit from the input of the applicant's Occupational Therapist. In normal circumstances if the applicant does not respond within this timescale, the offer will be recorded as a refusal.
- 17.4. Applicants have one working day from the time of viewing to make a decision as to whether they wish to sign the tenancy.
- 17.5. We will ensure at sign-up that applicants are fully aware of their rights and responsibilities under the terms of their tenancy agreement.

## **18. TRANSFERS**

- 18.1. Our existing Assured tenants may request a transfer to another one of our properties; we do not allow transfer from like-to-like properties without an urgent need or because of special circumstances, and an exception to this policy has been formally agreed by a member of the Executive Team.
- 18.2. Tenants who have an Assured Shorthold Tenancy (Starter Tenancy) are not eligible to transfer.
- 18.3. Any transfer requests outside of the above criteria can only be approved via an exception to policy requests being submitted and approved by a Member of the Executive Team.
- 18.4. Tenants requesting a transfer must:
  - undergo a pre-transfer inspection to ensure that their home has been maintained to an acceptable standard with no damage present;
  - have a clear rent account and no other outstanding debt with EPIC;
  - not to be in breach of tenancy; and
  - prove their existing home is in good condition except for fair wear and tear, and that approving a transfer will not result in any rechargeable repairs.
- 18.5. To help tenants who need, or who are willing to downsize from a house thereby freeing up family accommodation, a specifically adapted property, or a bungalow, we will grant a priority band to transfer applicants under-occupying their home.

## 19. MUTUAL EXCHANGES

- 19.1. Assured tenants are eligible to apply for permission to exchange their home for a property occupied by another of our tenants, or by a Local Authority or other registered provider. These will be dealt with under our Assignment, Mutual Exchange & Succession Policy and Procedure. We will assist our tenants to apply for exchanges using approved internet-based mutual exchange services.
- 19.2. Tenants will not be charged a fee for this service.

## 20. RENT IN ADVANCE AND AFFORDABILITY

- 20.1. Throughout the application and allocations process, the applicant will be reminded for the required payment of one month's rent in advance on signing the tenancy agreement.
- 20.2. The applicant will also be asked to pay their rent via standing order.
- 20.3. Offers of accommodation may be withdrawn if rent is not paid at the beginning of the tenancy period. Applicants may be entitled to help from their local council to pay their rent in advance if you need to move home. Your council will look at your circumstances to see whether you are eligible for a Discretionary Housing Payment.
- 20.4. Information about Discretionary Housing Payments can be found at [www.gov.uk/government/publications/claiming-discretionary-housing-payments](http://www.gov.uk/government/publications/claiming-discretionary-housing-payments)
- 20.5. Tenants will be required to sign a disclaimer form if accepting a tenancy that is not covered by the Local Housing Allowance or relevant Benefit Entitlement. An example of this is where a tenancy is subject to under-occupancy charges for Council Tax purposes.

## 21. USE OF DISCRETION

- 21.1. EPIC expects that the vast majority of allocations will be made following the allocations rules according to priority banding and by time spent in bands. However, there may be reasons why discretion has to be used as follows:
- 21.2. **Managers' discretion** – There may be exceptional circumstances where the only way an exceptionally urgent housing need can be resolved is through the use of management discretion. It is important, in fairness to all applicants, that these discretionary powers are used rarely in genuinely exceptional cases.

Examples of such exceptional circumstances can include:

- Emergency cases where homes are damaged or destroyed by flood, fire or other disaster and it is not possible to repair the current home, or repair will take such a long time that it would seriously disrupt family life. We may seek the support of other Registered Providers if we are unable to provide accommodation within our existing stock.
  - Households that, on strong police evidence and advice, need to move because of serious threats made to one or more members of the household, or where the continued occupation would pose a threat to the community. In such circumstances, it is expected that the threat is best addressed by any rehousing at the maximum possible distance from the original address consistent with reducing the risk. We may seek the support of the relevant Local Authority to achieve this.
- 21.3. **Other exceptional circumstances as authorised by the Director of Housing Management**  
Where such cases are in the reasonable preference categories, they will be awarded additional preference and placed at the top of Band 1 irrespective of time on the register and will be made a direct offer of accommodation if all other housing options have been explored. Where such cases are not in the reasonable preference categories, the Director's discretion will be required to authorise the application being placed in Band 1.

Where a case is exceptional and significant and the normal application of the Allocations Policy is considered not to award the appropriate priority, the Director of Housing Management reserves the right to award an applicant higher priority than the policy normally allows. Such cases should be very few in number and will be closely monitored to ensure the duty to award reasonable preference is not compromised. The Director's discretion can be used to block an application in circumstances not predicted by this scheme but where EPIC is satisfied that someone has taken unfair advantage of the policy to the detriment of others.

## **22. MANAGING LOW DEMAND**

- 22.1. We will regularly review demand and, where necessary, we will use a variety of methods to ensure that we market our properties successfully.
- 22.2. Advertising properties online and subject to our normal allocation checks and banding.
- 22.3. Proactive contact of eligible applicants on our waiting list to secure a successful letting.
- 22.4. Holding open-property events and letting properties to applicants ready to move within our preferred property-letting timeframe.
- 22.5. When either our own internal waiting list, or the nominations process (including local lettings arrangements), is unable to identify an applicant for a property, we will consider contacting other agencies or use direct marketing to find a tenant such as advertising properties through commercial online lettings agencies. We will also advertise such properties through our website and through social media.
- 22.6. In these circumstances, consideration will also be given to applicants who would, in other circumstances, not be eligible for the property in question due to existing occupancy criteria. This consideration would have due regard to the sustainability of the tenancy and the circumstances of the applicant and of existing residents in neighbouring properties.

## **23. RESPONSIBILITIES**

- 23.1. The roles and responsibilities for key stakeholders across EPIC are detailed below:
  - 23.1.1. The Board of Directors is responsible for approving this Policy.
  - 23.1.2. The Director of Housing Management is responsible for ensuring that the policy and procedures are effective and in line with legislation.
  - 23.1.3. The Housing Manager is responsible for:
    - Developing and implementing operational procedures to deliver the policy objectives.
    - Embedding the policy through staff training, learning and development.
    - Monitoring the overall effectiveness of the policy, cost, quality and time.
    - Reporting to the management team on the operational effectiveness of the policy.
    - Evaluating, amending, and enhancing the delivery of the policy.
    - Ensuring that all front-line and relevant staff will adhere to this policy.

## **24. TRAINING**

- 24.1. We will ensure that staff are aware of the contents of this policy and how to apply the policy and accompanying procedures.

## **25. DATA VALIDATION, REVIEW AND MONITORING**

- 25.1. This Policy is due to be reviewed in April 2029 unless there is a change in legislation, or a change in the way properties are allocated, for example Choice-Based Lettings.

## **26. EQUALITY AND DIVERSITY IMPLICATIONS**

- 26.1. We are committed to ensuring and promoting equality of opportunity for all. We are opposed to discrimination on any grounds, including race, religion, gender, marital status, sexual orientation, disability, age, or any unjustifiable criteria. We are committed to developing a culture that values people from all sections of society and the contribution which each individual can make. We will ensure our approach to accessing properties is considerate to people's individual needs. We also adhere to the Equality Act 2010.
- 26.2. EPIC Housing recognises that some people experience disadvantage due to their socio-economic circumstances and will strive to ensure no person or groups of persons is treated with injustice due to their personal circumstances. EH will also ensure that all services and actions are delivered within the context of current Human Rights legislation and will make sure the central principles of the Human Rights Act (1998) will be adhered to.
- 26.3. The policy has been subject to an Equality Impact Assessment (EIA) which has shown that there are no disproportionate disadvantages arising for applicants with protected characteristics, the aim of this policy is to assist those in priority need of housing.

## **27. DATA PROTECTION AND INFORMATION SHARING**

- 27.1. We are committed to ensuring that the personal data of our tenants (current, former, and future) is handled in accordance with the principles set out in the UK General Data Protection Regulation (GDPR) and The Data Protection Act (DPA) 2018.
- 27.2. A copy of our Privacy Notice can be found [on our website](#). The privacy notice tells you what to expect when EPIC Housing collects personal information about you. It applies to applicants for housing, tenants and members of their household, former tenants, visitors to our properties and schemes, and visitors to the EPIC Housing website.

## **28. INFORMATION SHARING WITHOUT CONSENT**

- 28.1. Information may be shared about applicants and any member of their household and their history irrespective of whether their consent has been obtained, in exceptional circumstances. This will be on a case-by-case basis, where the law requires or permits, and the disclosure is necessary and proportionate for the purposes of meeting one or more of the following interests:
  - national security
  - public safety
  - safeguarding
  - the detection or prevention of disorder or crime
  - protection of the rights or freedoms of others (e.g., safeguarding the public)

## **29. COMPLAINTS**

- 29.1. If an applicant believes there are errors in the way an application has been handled, it should be raised as a complaint using EPIC's complaints procedure.
- 29.2. An applicant can ask someone else or an organisation such as Citizen's Advice to make a complaint on their behalf and can ask a member of staff at EPIC for help in preparing the complaint.
- 29.3. All applications will be handled with care and in accordance with this policy.
- 29.4. If there are any complaints, the complaints process described above should resolve them. However, if an applicant, having gone through the complaints process, has not had the complaint resolved, they are entitled to contact the Housing Ombudsman.
- 29.5. Applicants can contact the Housing Ombudsman Service at any point during their complaint.

Contact details for the Ombudsman:

- [www.housing-ombudsman.org.uk](http://www.housing-ombudsman.org.uk)
- Write to: Housing Ombudsman Service, PO Box 1484, Unit D, Preston, PR2 0ET
- Call: 0300 111 3000
- Email: [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk)

29.6 In the event that a complaint is received that expresses dissatisfaction rather than alleging specific failure to follow the allocations scheme rules (for example a complaint expressing unhappiness that another applicant has been offered a home that the complainant would have liked) the complainant will be reminded of the allocation rules and invited to respond with specific details of a perceived failure to follow this allocations scheme. In the absence of a specific allegation of failure to follow this Allocation Policy, the complaint will be closed, and no further communication will be entered into.

### 30. ASSOCIATED DOCUMENTS

- Assignment, Mutual Exchange and Succession Policy
- Tenancy Agreement
- Rent Arrears Policy
- Tenancy Fraud Policy

## Version Control

Date of Review	Reviewer	Version Number	Changes	Date of Next Review	Approved By
Aug 2023	Director of Housing Management	V2.0	Minor Amendments to review of applications changed to annual. Changes to bedroom entitlement	January 2024	Executive Team
July 2024	Director of Housing Management	V3.0	Rewrite of Policy to include for introduction of Bands as assessing applications for priority. To go live April 2026	July 2029	Executive Team with referral to Board taking into account significant changes.
October 2024	Director of Housing Management	V3.0	As above	July 2029	