



Housing Allocations Scheme 2017

as amended January 2022

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1: Introduction

About the Allocations Scheme

- 1.1 This document sets out the City of London Corporation's (the City Corporation) Housing Allocations Scheme. This determines the basis for allocating vacancies within the City Corporation's social housing stock and housing association vacancies to which it has nomination rights.
- 1.2 This document provides comprehensive information about the process the City Corporation applies to the allocation of social housing. This will ensure applicants are informed about and can understand how decisions are made.
- 1.3 The City Corporation uses a points based Allocations Scheme. Applicants' circumstances will be assessed and points will be awarded to reflect the urgency of a household's housing need. Using points means we are able to operate a fairer system, taking the full range of each applicant's circumstances into account and ensuring housing goes to those most in need.
- 1.4 The Allocations Scheme cannot cover every eventuality. The City Corporation recognises that some exceptional circumstances may arise which are not addressed by this scheme. In such cases the Assistant Director for Housing and Neighbourhoods has discretionary powers for example; to award additional priority, to approve offers of housing and to exempt applicants from one or more rules set out in this scheme, taking into consideration all factors relevant to housing and social needs.
- 1.5 In developing the Allocations Scheme, consideration has been paid to the City Corporation's Housing Strategy, Homelessness Strategy, Tenancy Strategy, Fraud Policy, Strategic Housing Market Assessment and the Department of Community and Children's Service's Business Plan. As such, the aims of this Scheme are to:
 - achieve a balance between the housing needs of existing City of London tenants and those applying to be new tenants
 - make the best use of our housing stock in this time of extremely high demand for social housing
 - be clear about who can go on our housing register, how we will prioritise households on the register, and the process for allocating homes
 - efficiently let our properties to reduce the amount of time properties are empty

- help achieve our Business Plan aim to develop strong neighbourhoods and ensure people have a decent place to live.

Statement on Choice

- 1.6 The Housing Act 1996 requires local authorities to include in their Allocations Scheme a statement of the authority's policy on offering applicants a choice of accommodation or the opportunity to express preferences about their accommodation.
- 1.7 The City Corporation will offer a choice of accommodation in line with its Choice Based Lettings scheme, which provides the opportunity to choose accommodation by expressing an interest in properties that are advertised (see section 10 for details of this process).

Legal Context

- 1.8 The policies set out in this document are shaped by a framework of legislation including the Housing Act 1996 (as amended by the Homelessness Act 2002 and the Localism Act 2011). It also reflects regulations and guidance issued by government relating to allocations. The City Corporation is required by s.166A(1) of the Housing Act to have an allocations scheme for determining priorities, and for defining the procedures to be followed in allocating housing accommodation; and must allocate in accordance with that scheme (s.166A(14)).

Equalities

- 1.9 The City Corporation promotes equal opportunities and opposes all forms of unfair discrimination. Providing a clear and consistent policy for housing allocation supports the City Corporation's duty to treat all applicants fairly. All applications and decisions relating to them will be made in line with this policy, irrespective of the applicant's gender, marital or civil partnership status, race, nationality or ethnic origin, disability, sexual orientation, age, gender reassignment or pregnancy and maternity status.

Policy changes

- 1.10 This scheme takes account of relevant legislation, Government guidance and relevant City of London Corporation strategies and policies. Therefore, this scheme will be reviewed regularly to reflect any Government or local policy changes.
- 1.11 New government guidance and newly arising circumstances can require amendment to policies during their proposed lifetime. To make sure this allocations policy remains current and operates fairly and

within the law, the Director of Community and Children's Services in consultation with the Chairman of Housing Management and Almshouses Sub Committee will be able to approve minor amendments. Major revision will subject to approval by the Sub Committee and where appropriate to a public consultation.

2: The Housing Register

- 2.1 To support the Allocations Scheme the City Corporation holds a Housing Register of applicants who can be considered for an allocation of social housing.
- 2.2 Applicants must normally be over 18 years of age in order to receive an offer of accommodation from the City Corporation. In exceptional circumstances, applicants under the age of 18 will be considered after a referral from Children's Social Care.
- 2.3 There are three stages an applicant must pass before being considered for an allocation of general needs social housing; **eligibility**, **qualifying** and **preference**. These are applied in different ways to new applicants and City Corporation tenants applying for a transfer. The precise meanings of these terms are defined in sections 3 - 6.
- 2.4 A slightly different system operates for older people's housing. For more information on this, please see section 13.

New Applicants

- 2.5 To join the Housing Register, applicants who are not current tenants of the City Corporation must demonstrate that they are:
 - a) **eligible** for an allocation of accommodation
(see section 3)
 - and b) **qualifying** for an allocation of accommodation
(see section 4)
- 2.6 If accepted onto the Housing Register, an application for a new tenancy will also be assessed to determine whether the applicant is:
 - i) entitled to **reasonable preference**
(see section 5)
 - or ii) a **City letting preference**
(see section 6)
 - or iii) able to join the **low priority** group only
(see section 6)

Tenant Transfers

- 2.7 To join the Housing Register, applicants who are current City Corporation tenants applying for a transfer must demonstrate that they are:
- a) **qualifying** for an allocation of accommodation (see section 4)
 - and b) either
 - i) entitled to **reasonable preference** (see section 5)
 - or ii) a **City transfer preference** (see section 6)
- 2.8 The City Corporation does not offer like for like transfers and current tenants who cannot demonstrate either **reasonable preference** or a **City transfer preference** will not be able to go on the Housing Register.
- 2.9 Existing City Corporation tenants who wish to move can register for a mutual exchange, access the pan-London mobility scheme Housing Moves or apply to another local authority under the Right to Move. For further information on any of these schemes, interested tenants should contact the Housing Needs Team.

3: Eligibility

3.1 In order to join the Housing Register applicants must be both eligible and qualifying and meet the requirements for either 'reasonable' or 'additional' preference as laid out in the Housing Act 1996 as amended by the Localism Act 2011

3.2 The following groups are **not** eligible to join the Housing Register:

- people subject to immigration control
- people who only have the right to reside in the UK because they (or a member of their household) are a jobseeker
- people who are not habitually resident in the UK
- people who have a right to reside in the UK of less than three months.
- People who have No Recourse to Public Funds (NRPF)

3.3 Full details of the classes of persons from abroad who are eligible or ineligible for an allocation are available in the Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006 (SI 2006 No.1294) and subsequent amendments.

3.4 A joint tenancy will not be offered unless both proposed tenants meet the eligibility criteria; if only one proposed tenant meets the eligibility criteria a sole tenancy in that person's name will be offered.

4: Qualifying

4.1 Qualification for social housing is determined by local housing authorities, subject to some statutory requirements.

4.2 Different qualifying criteria apply to those applying for a new tenancy and current tenants applying for a transfer. These are displayed in the table below:

| Qualification criteria | New tenancy | Tenant transfer |
|---|-------------|-----------------|
| Applicants must demonstrate a local connection (see 4.3) or exemption from this rule (see 4.4) | ✓ | |
| Neither the applicant, nor any member of their household, owns in full or in part, a property in the UK or abroad | ✓ | ✓ |
| Neither the applicant, nor any member of their household, holds, a secure, assured, flexible or introductory tenancy with another social landlord, which they do not intend to surrender upon transfer | ✓ | ✓ |
| Neither the applicant, nor any member of their household, must have previously exercised their right to buy or have received a cash incentive for a mortgage and subsequently sold their property (this criteria will be disregarded if the City Corporation subsequently accepts a homelessness duty under Part VII of the Housing Act 1996) | ✓ | ✓ |
| The applicant (and their partner, if part of the household) must have an annual combined income (excluding benefits and before tax) of less than £60,000 | ✓ | |
| The applicant (and their partner, if part of the household) must have savings or capital of less than £30,000 <ul style="list-style-type: none"> • Any lump sum received by a member of the Armed Forces as compensation for an injury or disability sustained on active service will be disregarded • This would normally exclude pension fund assets needed to provide income in retirement | ✓ | |
| Neither the applicant, nor any member of their household, should have demonstrated unacceptable behaviour (see 4.5) | ✓ | ✓ |

4.3 In order to qualify for an offer of accommodation from the City Corporation, applicants must first demonstrate a local connection. This can be done in a number of ways:

- those who are resident in the City of London for a minimum period of 24 months (including temporary or supported accommodation provided by the City Corporation in other areas)
- those employed by the City Corporation, in any location and including the City of London Academies Trust, for a minimum of 24 months (including interim or supported employment and employees on parental leave)
- those employed within the City of London for a minimum 24 months and who have been working for at least 16 hours per week (including interim or supported employment and employees on parental leave)
- those who currently live in the household of a City Corporation tenant who is, or whose partner is, their parent or legal guardian. To qualify in this way the child must also:
 - have spent at least two years of their childhood (defined as under 18 years old) in that tenant's household
 - and have spent their entire adult life to date (defined as 18 years old and over) in that tenant's household apart from periods spent outside the household:
 - o to attend university
 - o to join the Armed Forces
 - o to undergo medical treatment
 - o to serve a custodial sentence
- those who are a young person looked after by the City Corporation and placed in care, irrespective of the location of their placement
- those who provide care and support to a City resident or City Corporation tenant or a member of their household. This relationship must be recognised by an award of Carer's Allowance or by an Adult Social Care Carer's Assessment.

4.4 When allocating its housing, the Corporation is committed to ensuring that certain categories of people have access to appropriate accommodation. This allocations scheme therefore ensures that the requirement for a local connection set out in 4.3 does not apply to the following groups:

- those who are currently serving in the regular armed forces or who were serving in the regular forces at any time in the five years preceding their application for social housing
- bereaved spouses or civil partners of those serving in the regular forces where (i) the bereaved spouse or civil partner has recently ceased or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of their service spouse or civil

partner and (ii) the death was wholly or partly attributable to their service

- existing or former members of the reserve forces who are suffering from a serious injury, illness, or disability which is wholly or partly attributable to their service
- households to whom the City Corporation has accepted a full homelessness duty under Part VII of the Housing Act 1996
- households who are exercising their Right to Move under the Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015 (SI 2015/967)
- households the City Corporation has agreed to house as part of a reciprocal agreement with another housing authority
- households who are referred to the City Corporation through Housing Moves and other reciprocal mobility schemes.
- households with an urgent need to move away from their current local area. For example an applicant who is fleeing domestic violence.

4.5 Applicants will be excluded from the City Corporation's Housing Register if their behaviour, or the behaviour of a member of their household or a guest of the household, has not been acceptable and there are reasonable grounds to believe that the applicant will not be a suitable future tenant. Unacceptable behaviour includes:

- owing serious rent arrears to any current or past landlord
- failing to comply with a current or past tenancy or licence agreement with a local authority, housing association or private landlord
- conviction for illegal or immoral purposes
- causing nuisance and annoyance to neighbours or visitors which results in court proceedings
- committing certain criminal offences and still posing a threat to neighbours or the community
- any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse towards a partner or members of the family. This can encompass but is not limited to psychological, physical, sexual, financial and emotional abuse
- paying money illegally to obtain a tenancy
- having lost accommodation provided in connection with employment due to conduct making it inappropriate for the person to reside there
- obtaining, or attempting to obtain, a tenancy fraudulently
- committing, or attempting to commit, tenancy fraud
- knowingly giving false or misleading information, or knowingly withholding relevant information, in an attempt to further an application for housing.

5: Reasonable Preference

- 5.1 When determining allocation priorities, the City Corporation's Allocations Scheme is required by Part VI of the Housing Act 1996 to give 'reasonable preference' to certain categories of people. These are prescribed by the Act and are as follows:
- people who are homeless within the meaning of Part VII of the Housing Act 1996 (including those who are intentionally homeless and those not in priority need)
 - people who are owed a duty by any housing authority under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under s.192(3)
 - people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
 - people who need to move on medical or welfare grounds, including grounds relating to a disability, and
 - 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).
- 5.2 The City Corporation will award cumulative preference to applicants who meet two or more of the above reasonable preference criteria.
- 5.3 The City Corporation will give additional preference to applicants who meet one of the above reasonable preference criteria and who are:
- at risk of domestic abuse in their current home
 - a witness or victim of crime and at risk of intimidation in the vicinity of their current home
 - harassed, threatened or attacked in their local area
 - former members of the Armed Forces
 - serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service
 - bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner
 - serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service.

6: City Preferences

City Letting Preferences

6.1 In addition to those applicants entitled to reasonable preference, the City Corporation will give some preference to eligible and qualifying new applicants who fall into one of the following groups:

I. Lower income City connection

6.2 The City Corporation will give some preference to those with a City connection who are on a low income. This includes:

- a) People who currently work within the City of London, have done so for at least 24 months and for at least 16 hours per week, and whose household earnings are below the threshold identified in section 6.3.
- b) People who currently live within the City of London and who are legally responsible for paying the rent for their current accommodation and whose household earnings are below the threshold identified in section 6.3.
- c) City Corporation and City of London Academies Trust employees, regardless of their location of employment, whose household earnings are below the threshold identified in section 6.3.
- d) People who currently provide unpaid care for a City of London resident, tenant or a member of their household, have done so for at least 24 months and for at least 16 hours per week, and whose household earnings are below the threshold identified in section 6.3. Proof will be required in the form of an award of Carer's Allowance or a carer's assessment from Adult Social Care.
- e) Sons and daughters of current City Corporation tenants who are entitled to preference under 6.5 and who are also employed at any location to work at least 16 hours per week and have done so for at least 24 months.
- f) People who neither live nor work within the Square Mile, but who can demonstrate a need to live in the City of London or on one of its estates whose household earnings are below the threshold identified in section 6.3 would be considered for a discretionary registration. Evidence as to why the household needs to be considered for a

discretionary registration must be submitted in support of the application form and will be reviewed by the Housing Needs Team. Any discretionary registration has to be authorised by the Assistant Director of Housing & Neighbourhoods.

6.3 The income threshold for 'Lower income City connection' is set in line with the earnings a two full-time worker household working 37.5 hours per week earning the National Living Wage would receive. The assessment operates on a financial year basis, before tax and excluding benefits. It includes only the income earned by two joint applicants or a sole applicant and their partner.

6.4 As of 1 April 2021, the threshold is £32,064 per year. Subsequent increases in the National Living Wage will automatically be reflected in an increase to this threshold. The City Corporation will consider a decrease in this threshold if an application is made by a single applicant.

II. Sons and daughters of current City Corporation tenants

6.5 The City Corporation will give some preference to the children of current City Corporation tenants. Those applying under this route should:

- currently live in the household of a City Corporation tenant who is, or whose partner is, their parent or legal guardian
- have spent at least two years of their childhood (defined as under 18 years old) in that tenant's household
- have spent their entire adult life to date (defined as 18 years old and over) in that tenant's household apart from periods spent outside the household:
 - to attend university
 - to join the Armed Forces
 - to undergo medical treatment
 - to serve a custodial sentence

6.6 The Universal Credit (Housing Costs Element for claimants aged 18 to 21) (Amendment) Regulations 2017 (2017/252) came into force on 1 April 2017. This removed entitlement to the housing element of Universal Credit (currently Housing Benefit) from young people aged 18-21. This is subject to a number of exemptions including vulnerable young people, young people who are parents themselves, those who may not be able to

return home to live with their parents, and those who have been in work for six months prior to making a claim.

- 6.7 For this reason, those aged between 18 and 21 and wishing to join the Housing Register as a son or daughter of a current City Corporation tenant must pass an affordability check, demonstrating that they either qualify for one of the exemptions to the housing element restriction, or that they will otherwise be able to pay their rent.

III. Retiring City Corporation employees who have been in tied accommodation

- 6.8 Some City Corporation employees are provided with tied accommodation to help them fulfil their duties. Upon retirement, these employees may be entitled to an alternative offer of accommodation via the waiting list.
- 6.9 Retiring City Corporation employees who have been in tied accommodation will not receive points and will instead be given one direct offer of suitable accommodation. See 11.3.IX for more details.
- 6.10 Retiring employees made an offer of accommodation in this way are ending their tied tenancy and signing a new social tenancy. As such there is no entitlement to Shift Scheme payments.

Low Priority

- 6.11 New applicants who are both eligible and qualifying for an offer of accommodation will always be able to go on the Housing Register. However, those who are entitled to neither reasonable preference nor City letting preference will be able to go in the low priority group only.

City Transfer Preferences

6.12 In addition to those transfer applicants entitled to reasonable preference, the City Corporation will give some preference to qualifying transfer applicants who fall into one of the following groups:

I. Decants and returning tenants

6.13 City Corporation tenants who need to leave their homes to enable a major works project to go ahead will be placed in this group. Tenants who are temporarily decanted and have a Right of Return will also be able to bid in this group.

6.14 Tenants who do not need to move due to a decant for at least 12 months will begin with a moderate amount of priority. Priority will be increased for tenants who need to move within 12 months and again for those who need to move within six months.

II. Under-occupying tenants

6.15 City Corporation tenants who are under-occupying a two-bedroom property or larger and wish to move to more suitable, smaller, accommodation will be placed in this group. Those choosing to downsize may be eligible for a Shift Scheme payment.

6.16 Fixed term tenants, successors and assignees who are required to move to a smaller property upon renewal or transfer of their tenancy will also be placed in this group. They will not be eligible for a Shift Scheme payment.

III. Studio upgrades

6.17 City Corporation tenants occupying studio accommodation and with no other identified housing need will be able to apply for a transfer to a one bedroom home in three circumstances:

- (a) The tenant is aged 45 or over.
- (b) The tenant is a parent whose child does not live with them, but who visits regularly and would stay overnight if there were space. Applications will be prioritised with an award of secondary points for a low welfare need (see 9.45.IV).
- (c) The tenant lives with a spouse, a civil partner, or a partner who has lived in the property continuously for at least one

year. Applications will be prioritised with an award of secondary points for one bedroom lacking (see 9.18).

- 6.18 Child, for the purposes of 6.17(b), 8.11 and 9.45.IV, is defined as a person under 18 years old, or as a person under 25 years old who is in full time education or who has special educational needs.

7: Joining the Housing Register

Applying to the Housing Register

- 7.1 To join the Housing Register applicants must complete a housing application form and where appropriate, medical or additional assessment forms.
- 7.2 Applicants who need help with completing the form can request an appointment during office hours with the Housing Needs Team who will be able to help them. See 15.5 for contact details.
- 7.3 Applicants will be asked to provide information and evidence to enable officers to check their eligibility, qualification and preference status. This will usually include:
- photo identification
 - proof of identity for all household members and evidence of their right to live in the UK if they are not British Citizens
 - proof of address for the last five years
 - a recent Council Tax bill for their current address. This may be in the name of a parent or landlord
 - national insurance number
 - proof of their residency in or employment connection to the City
 - proof of savings and bank accounts
 - proof of earnings
 - a passport sized photograph for each main applicant.
 - Evidence of settled or pre-settled status where applicable
- 7.4 If the City Corporation is satisfied that the applicant is eligible to be on the Housing Register, an initial assessment will be made based on the information on the application form and any other information provided.
- 7.5 Applications will normally be processed within 30 working days, once all the required information has been provided in the requested form.
- 7.6 If the information and supporting documents necessary to process the application are not provided within 6 months of the Housing Needs Team receiving the application and there has been no response to reminders for the documents, the application will be cancelled.
- 7.7 All those accepted on to the Housing Register will be assessed and placed in the appropriate bedroom category for their household size and made an award of points based on their circumstances. Applicants will be sent a letter explaining the points awarded to them, their priority date and guidance on how to bid for properties.

- 7.8 If an applicant feels that their application has been assessed incorrectly under the scheme or relevant circumstances have not been taken into account, they may request a review of the decision and must be able to provide supporting evidence. To request a review, the applicant should write to the Housing Needs Team setting out reasons for requesting a review within ten days of their notification letter.

Application update and renewal

- 7.9 Applicants must notify the Corporation of any changes in their circumstances as they arise, such as, but not limited to, a new partner, a relationship breakdown, a child leaving home, a new child being born, or a change of address or employment.
- 7.10 Following an applicant informing the Housing Needs Team of a change of circumstances, the application will be suspended until all necessary proof documents have been provided and a reassessment carried out.
- 7.11 When an applicant's change of circumstance has been reassessed, this may result in a change in the applicant's points, bedroom need or priority date. If an applicant loses their status as an eligible or qualifying person their application to the Housing Register will be closed. The applicant will be informed of the outcome of the reassessment in writing.
- 7.12 The Housing Needs Team will also conduct a frequent Census of the Housing Register to confirm applicants details are correct and that all applicants remain eligible.
- 7.13 The City Corporation will seek to confirm that an applicant is an eligible and qualifying person upon adding them to the Housing Register and, where a long time has elapsed since the original application, again when considering making an allocation.

Duty to provide accurate information

- 7.14 As part of their application, all applicants will be required to sign a declaration giving the Housing Needs Team permission to make investigations into their application. This will include use of the National Fraud Initiative database and may include credit check agencies.
- 7.15 Under Section 171 of the Housing Act 1996, it is a criminal offence for an applicant to knowingly give false information or to withhold information relevant to their application. A fine may be imposed by the courts if the applicant is found guilty.

7.16 This applies if:

- an applicant knowingly or recklessly makes a statement which is false in a material particular
- knowingly withholds information which the City Corporation has reasonably required the applicant to give in connection with the exercise of its functions.

7.17 This applies at all stages of the application. If there is significant change in the applicant's housing circumstances then there is an obligation on them to inform the City Corporation.

7.18 An applicant found to be submitting false statements or providing false evidence may be excluded from the Housing Register for a period of 10 years.

7.19 An applicant convicted of social housing fraud with any registered provider will be excluded from the Housing Register for a period of at least 15 years.

8: Assessing Household Size

Who can be included in an application?

- 8.1 When assessing the size and type of housing an applicant requires, the City Corporation will only consider the applicant and their partner, their children and any other person who needs to live in the household to provide or receive care. While other family members are able to join the household, their needs will not be reflected in the size and type of housing offered.
- 8.2 A partner will be considered where they have lived with the applicant in a permanent relationship for at least 12 months or if they are married to or in a civil partnership with the applicant.
- 8.3 All dependent children currently living with the applicant or their partner will be considered.
- 8.4 Dependent children who are not currently living with the applicant or their partner will be considered, where the applicant or their partner has a legal care responsibility for the child (e.g. guardianship or a residence order) amounting to 50 per cent of the time.
- 8.5 Adult children currently living with the applicant or their partner will be considered, providing they have spent their entire adult life (defined as 18 years old and over) to date in their parent's household apart from periods spent outside the household:
- o to attend university
 - o to join the Armed Forces
 - o to undergo medical treatment
 - o to serve a custodial sentence
- 8.6 Adult children who meet the criteria set out in 8.5 can have their own partners and children considered, providing the partner or child meets the criteria set out in 8.2, 8.3, 8.4 or 8.5, substituting the words 'applicant or their partner' for 'relevant adult child or their partner'.
- 8.7 A person who needs to join the applicant's household to provide or receive care can be considered. The person receiving care must be unable to live independently and there must be no other options available for their care. The City Corporation will seek an assessment and recommendation from its independent medical assessor or the Adult Social Care Service Manager to confirm this.

The City Corporation's Bedroom Standard

- 8.8 Applicants will be assigned a bedroom need based on the number of people on their application accepted as part of the household. The City Corporation generally assesses the number of bedrooms needed as follows:
- one bedroom for the applicant (and their partner)
 - one bedroom for any additional adult couple
 - one bedroom for any two additional people of the same gender aged under 18
 - one bedroom for any two additional people of different genders aged 9 and under
 - one bedroom for any additional person.
- 8.9 Where a room in a property is extremely small, the City Corporation will depart from the above bedroom standard and instead make an assessment under Section 326 of the Housing Act 1985 (the space standard).
- 8.10 A household containing two or more people will be assessed as requiring a living room. Regardless of whether or not a living room is used by a household as sleeping accommodation, it will not be counted as a bedroom for the purposes of assessing a household's needs.
- 8.11 Single applicants normally qualify for a studio property only. However, single applicants will be assessed as requiring a one bedroom flat if they are parents whose children (see 6.18) do not live with them but who visit regularly and who would stay overnight if there was space to do.
- 8.12 Applicants will be assigned a larger bedroom need than is suggested above if this is the outcome of a medical or additional needs assessment. This could apply in, although is not limited to, situations where:
- a household member requires overnight care;
 - a household member's disability or medical condition means it is not reasonable for them to share a bedroom with a partner or sibling;
 - to enable a fostering arrangement or adoption to take place.
- 8.13 In most cases, applicants will only be considered for properties that have the correct number of bedrooms for their household size as determined by the City Corporation's Bedroom Standard. There are a number of exceptions to this listed below:

- a) The City Corporation does not have any properties with five or more bedrooms. Households who require five or more bedrooms will be able to bid for four bedroom homes.
- b) A household made up of either a couple and a child under 12 months, or a single parent and a child under 12 months, will be entitled to a two bedroom home under the Bedroom Standard. They can also bid for one bedroom homes until the child reaches 12 months.
- c) Where the City Corporation agrees to move a tenant under a Management Transfer or a Decant, we will aim to provide a property that is suitable for the household's needs. However, these groups have an urgent need to move away from their current accommodation. Applicants may bid on, and may receive Direct Offers for, properties that are similar to their current homes. Any such offer will not disadvantage a pre-existing transfer application.
- d) For example, a household is overcrowded in a two bedroom home and is on the transfer list. A Management Transfer is agreed due to their suffering ASB. Although the household are eligible for a three bedroom home, they may also bid on and may be given a Direct Offer for, a two bedroom home. In this case, their transfer application for a larger property would remain open with their original priority date.
- e) Applicants who need to move under a Management Transfer or a Decant will not be able to bid on, or receive a Direct Offer for, a property larger than their assessed bedroom need, even if that home would be more similar to the property they currently occupy. Households who lose a bedroom may be eligible for a Shift Scheme payment.
- f) Applicants who are under-occupying and receive an independent medical assessment that does not recommend a spare bedroom (e.g. for storage of medical equipment) the applicant will be recommended for a downsize to the appropriately sized property and will be eligible for a shift payment.

9: Priority for Housing

- 9.1 Households accepted onto the Housing Register will be made an award of primary points which reflects their level of priority for housing. Primary points groups correspond to reasonable preference groups, City letting preferences and City transfer preferences. The points awarded reflect the aims of this policy and the preference the City Corporation is required by law to give to certain categories of need.
- 9.2 Where a household falls into more than one primary points group, they will be allocated to the group that receives the highest primary points award. The exceptions to this are households accepted as homeless, who must remain in the homeless primary points group, and households subject to a decant, who must remain within either the decant primary points group or the under-occupation primary points group.
- 9.3 Secondary points will be added to a household's points total to reflect cumulative preference (households that fall into more than one reasonable preference group) additional preference (prioritising households with certain circumstances) or other identified priorities.

Primary Points

- 9.4 Households accepted onto the Housing Register will be made an award of primary points that corresponds to the highest reasonable preference group, local letting or transfer priority into which they fit. The primary points groups are set out below.
- 9.5 **Management Transfer (800 Points)**
City Corporation tenants with an evidenced critical need to move, such as a need to flee threatened or actual domestic or other violence or harassment, or tenants with an exceptional or life threatening medical need to move will be placed in this group. Tenants who suffered the trauma of a child bereavement in their property will be offered a management transfer. This is a time limited band and all applicants in this band will be kept under review. Only one reasonable offer of accommodation will be made to applicants in this group (see 11.5).
- 9.6 **Under-occupation (400 Points)**
City Corporation tenants who are under-occupying a two-bedroom property or larger and wish to move to more suitable, smaller, accommodation will be placed in this group. Fixed term tenants and successors and assignees who are required to move to a smaller property upon renewal or transfer of their tenancy will also be placed here.

- 9.7 **Severe Medical or Welfare Needs** **(275 Points)**
A detailed description of medical and welfare needs is given in 9.33 - 9.45.
- 9.8 **Severe Overcrowding** **(250 Points)**
Households who are lacking two or more bedrooms according to the City Corporation's bedroom standard will be placed in this group.
- 9.9 **Studio Upgrade** **(250 Points)**
City Corporation tenants in studio flats who meet the criteria set out in either section 6.17 (a), (b) or (c) will be placed in this group and will be able to bid for a one bedroom home.
- 9.10 **Decants and Returning Tenants** **(225 Points)**
City Corporation tenants who need to leave their homes to enable a major works project to go ahead will be placed in this group. Tenants who are temporarily decanted and have a Right of Return to their original estate will also be able to bid in this group. Tenants subject to a decant must remain within either this group or the under-occupation group. Urgent decants will be prioritised with the addition of the extra points available in 9.32.
- 9.11 **Moderate Medical or Welfare Needs** **(225 Points)**
A detailed description of medical and welfare needs is given in 9.33 - 9.45.
- 9.12 **Moderate Overcrowding** **(200 Points)**
Households who are lacking one bedroom according to the City Corporation's bedroom standard will be placed in this group.
- 9.13 **Homeless** **(140 Points)**
Homeless applicants who have been assessed as being both homeless and eligible for assistance will be placed in this group. Applicants must remain within this group, but cumulative preference can be recognised through secondary points.
- 9.14 **Lower income City connection** **(100 Points)**
New applicants who meet who meet the criteria set out in either section 6.2 (a), (b), (c), (d), (e) or (f) and whose earnings are less than the threshold identified in 6.3 will be placed in this group.
- 9.15 **Sons and Daughters** **(50 Points)**
Sons and Daughters of current City Corporation tenants who meet the criteria set out in 6.5 will be placed in this group.

- 9.16 **Low Priority** **(1 Point)**
Applicants who are both eligible and qualifying but do not meet any reasonable or local letting preference criteria will be placed in this group. The City Corporation does not operate like for like transfers and this group is not open to current tenants.

Secondary Points

- 9.17 In addition to the primary points awarded above, additional points are awarded in the cases set out below. Not all secondary points are applicable to each primary points group. A description of the points available to each group is set out in the Points Matrix in section 9.46.

Overcrowding

- 9.18 **Per Bedroom Lacking** **(25 Points)**
Applicants who are overcrowded but who qualify for a higher primary points group or who are homeless will be awarded additional points per bedroom lacking.
- 9.19 **Mixed Sibling Sharing** **(10 Points)**
Where a household's overcrowding forces two or more siblings (or children under guardianship) of different genders, at least one of whom is age ten or over, to share a bedroom, these additional points will be awarded.

Wellbeing

- 9.20 **Medical - Severe** **(50 Points)**
A detailed description of medical need is given in 9.33 – 9.39.
- 9.21 **Medical - Moderate** **(25 Points)**
A detailed description of medical need is given in 9.33 – 9.39.
- 9.22 **Medical – Low** **(10 Points)**
A detailed description of medical need is given in 9.33 – 9.39.
- 9.23 **Welfare - Severe** **(50 Points)**
A detailed description of welfare need is given in 9.40 – 9.45.
- 9.24 **Welfare - Moderate** **(25 Points)**
A detailed description of welfare need is given in 9.40 – 9.45.
- 9.25 **Welfare – Low** **(10 Points)**

A detailed description of welfare need is given in 9.40 – 9.45.

Unsuitable Housing Conditions

- 9.26 **Sharing Accommodation** (5 Points)
Applicants who share the communal parts of their current accommodation with people outside of their normal household will be awarded these secondary points. Points are available on the following basis:
- sharing with family (10 Points)
 - sharing with 1-4 non-family members (15 Points)
 - sharing with 5+ non-family members.
- 9.27 **Without Tenancy** (5 Points)
Applicants without a tenancy agreement for their current home will be awarded these secondary points.
- 9.28 **Bedroom Cap** (50 Points)
Under-occupiers affected by the removal of the spare room subsidy will be prioritised over other tenants looking to downsize with an award of these secondary points.
- 9.29 **Long Temporary Accommodation Stay** (150 Points)
Homeless households who have spent longer than twelve months in temporary accommodation provided by the City Corporation and who have been actively but unsuccessfully bidding on suitable properties will have their applications given additional priority with these secondary points.

Housing Management

- 9.30 **Advice and Engagement** (15 Points)
Applicants whose current housing is severely unsuitable, either for their medical or welfare needs, or because of overcrowding, will be invited to develop a Personal Housing Plan with the Advice & Homelessness Officer. This will look at other ways in which applicants may resolve their housing needs besides the housing waiting list. Applicants who engage with this advice and are still unable to resolve their housing needs will be given additional priority with these secondary points.
- 9.31 **Intentionality** (minus 50 Points)
Households who have deliberately and consciously done something, or failed to do something, that has contributed to their current housing needs will have their priority reduced by the

deduction of these secondary points. This may include an applicant:

- Having applied for assistance under the Housing Act 1996 and been found intentionally homeless;
- Having moved into unsuitable accommodation to attract or increase priority for re-housing. This will apply when an applicant chose to occupy unsuitable accommodation when suitable and affordable accommodation was likely to be available to them;
- Having refused one Direct Offer, or three offers under Choice Based Lettings, of suitable accommodation from City Corporation.

- 9.32 ***Decant Urgency*** **(100 or 200 Points)**
Tenants who do not need to be decanted for at least 12 months will begin with a moderate amount of priority. Priority will be increased by the addition of 100 points for tenants who need to move within 12 months and by 200 points for those who need to move within six months.

Medical and Welfare Priority

Medical Priority

- 9.33 Medical points are awarded if, following advice from an independent medical advisor, the City Corporation considers that an applicant's, or a member of their household's, accommodation is unsuitable because of a medical condition.
- 9.34 Applicants who indicate that they or anyone in their household has an illness or disability which is affected by their current home will be asked to complete a medical self-assessment form and provide up to date documentary proof of their medical needs from qualified medical professionals. This is assessed and given a priority by an independent medical assessor.
- 9.35 Medical priority will be awarded according to the extent to which the health of the relevant household member is affected by their housing conditions and the expected benefits of providing alternative housing. No medical points will be given if there is a medical condition but the current accommodation is suitable.
- 9.36 As part of the assessment for medical priority consideration will be given to the suitability of the current property and any adaptations that have been carried out. If the housing need is met by the adaptations,

or could be met by further alterations, medical priority may not be awarded.

- 9.37 A maximum of one award of medical priority will be made per household member. If a person has multiple medical conditions, the relationship between the person's health and their housing should be assessed comprehensively. Additional awards of medical priority will only be made in situations where multiple members of the same household each have medical conditions that are affected by their current accommodation.
- 9.38 Medical priority will kept under review and may change if:
- the applicant moves to another property
 - there is a material change in the medical condition of an applicant or other member of the household
 - the condition is acute and the applicant had been awaiting treatment and the treatment is now complete, thereby resolving the medical need.
- 9.39 There are five possible outcomes to a medical assessment:
- I. Management Transfer**
This will only be awarded to current City Corporation tenants who have an exceptional or immediately life threatening medical need to move. This award will always result in the applicant being awarded the primary points available in 9.5.
 - II. Severe Medical Need**
This will be awarded to:
 - Households where it is assessed that current housing conditions are having a major adverse effect on the relevant household member's medical condition. It will not apply where the effect is moderate, variable or slight.
 - Existing or former members of the Armed or Reserve Forces who are suffering from a serious injury, illness, or disability which is wholly or partly attributable to their service (this applies to new applicants regardless of their current housing conditions).
 - Applicants who require adapted housing and/or extra facilities, which it is impractical to provide within their current accommodation.

- Households where two household members are assessed as having a moderate medical need.

This award will either result in the applicant being awarded the primary points available in 9.7 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.20.

III. Moderate Medical Need

This will be awarded to:

- Households where it is assessed that current housing conditions are having a moderate or variable adverse effect on the relevant household member's medical condition. It will not apply where the effect is slight.
- Households where two household members are assessed as having a low medical need.

This award will either result in the applicant being awarded the primary points available in 9.11 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.21.

IV. Low Medical Need

This will be awarded to:

- Households where it is assessed that current housing conditions are having a slight adverse effect on the relevant household member's medical condition.

This award will does not result in an entitlement to reasonable preference and applicants with no other housing need will remain in the low priority group described in 9.16. All applicants can have their low medical needs recognised by an award of the secondary points available in 9.22.

V. No Medical Need

Households where it is assessed that current housing conditions are having a minimal adverse effect on the applicant's or a member of their household's medical condition will not be entitled to any additional priority.

Welfare Priority

- 9.40 Welfare points are awarded if the City Corporation considers that housing or other circumstances are affecting the welfare needs of the applicant or a member of their household.
- 9.41 Applicants wishing to apply for additional welfare priority should complete an additional assessment form and provide appropriate documentary evidence. This will be assessed by Housing Needs Officers, in liaison with social services, estate officers, the Police and other support agencies as appropriate.
- 9.42 As part of the assessment for welfare priority consideration will be given to the suitability of the current property and any adaptations that have been carried out. If the housing need is met by the adaptations, or could be met by further alterations, welfare priority may not be awarded.
- 9.43 A maximum of one award of welfare priority will be made per situation. Where a welfare issue affects multiple members of the same household, only one award of welfare priority will be made. Where one household member is affected by two or more independent welfare issues, multiple awards can be made to the same individual.
- 9.44 For example, a couple who both need to move to provide unpaid care for an elderly relative will receive one grant of welfare priority. Two household members are affected, but the same situation is being shared. Conversely, a single applicant who is both inhabiting severely insanitary accommodation and is a former member of the Armed Forces can receive two awards of welfare priority. The two situations are independent of each other.
- 9.45 There are five possible outcomes to a welfare assessment, which are listed below. The examples offered for each category are by no means exhaustive. When assessing welfare issues not listed here, officers should compare the case before them with the examples provided and decide with which group it fits most closely.

I. Management Transfer

This will only be awarded to current City Corporation tenants who have an evidenced need to flee threatened or actual domestic or other violence or harassment. Tenants who suffered the trauma of a child bereavement in their property will be offered a management transfer. This award will always result in the applicant being awarded the primary points available in 9.5.

II. Severe Welfare Need

This will be awarded to households whose welfare needs are comparable to those listed below:

- Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support. This level of priority will be given where the absence of care and support would have a major adverse effect on the relevant person's wellbeing and independence. An example of this would be a person who may need to move into a residential or nursing care home if the care and support was absent.
- Where it is necessary to move because of the threat of violence or harassment, including domestic and sexual violence, witnesses or victims of crime at risk of intimidation, or an applicant harassed, threatened or attacked in their local area. An award of severe welfare priority will only be made if a Management Transfer or homeless application are not appropriate solutions. This level of priority can also be given to those who are homeless as a result of violence or harassment and require urgent re-housing.
- Where a non-tenant applicant living in a property where a child bereavement has taken place will be awarded severe welfare priority.
- Where an applicant is a foster carer or is approved to adopt and needs to move to a larger home in order to accommodate a looked after child or a child who was previously looked after by a local authority. This category also includes those who are in the process of being assessed for approval to foster or adopt and would need a larger home in order to accommodate a child. Should such an application be turned down, or should the applicant withdraw their application, priority for rehousing would be reconsidered.
- Where an applicant requires a larger home to adequately accommodate a child as a result of being a special guardian, holding a family arrangements order, holding a historical residence order or as a family and friends carer who is not a foster carer but who has taken on the care of a child because the parents are unable to provide care.
- Where a household occupies severely insanitary accommodation. This is defined as accommodation that is assessed as containing a Category 1 Band A hazard (apart from Crowding and Space) under the Housing Health and Safety Rating System (HHSRS). The relevant Environmental Health Officer must also confirm that they are of the opinion

that the defect is unlikely to be remedied in a reasonable timeframe.

- Where a household is assessed as being affected by two independent moderate welfare needs.

This award will either result in the applicant being awarded the primary points available in 9.7 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.23.

III. Moderate Welfare Need

This will be awarded to households whose welfare needs are comparable to those listed below:

- Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support. This level of priority will be given where the absence of that care and support would have a moderate or variable adverse effect on the relevant person's wellbeing and independence. An example of this would be a person who may require a care package from Adult Social Care if the informal care and support was absent.
- Bereaved spouses or civil partners of those serving in the Regular Forces where (i) the bereaved spouse or civil partner has recently ceased or will cease to be entitled, to reside in Ministry of Defence accommodation following the death of their service spouse or civil partner and (ii) the death was wholly or partly attributable to their service.
- Where there is a need for the applicant to move away from the immediate area because they are vulnerable. An example of this would be an applicant who had a substance abuse issue and has successfully completed a rehabilitation programme, but is at risk of relapse due to associations in their current area.
- Where there is a need to provide independent accommodation in the community for those who could not be expected to find their own accommodation, such as young adults with learning disabilities (those moving on from supported accommodation will be prioritised in section 11.3.VIII).
- Where a household is assessed as being affected by two independent low welfare needs.

This award will either result in the applicant being awarded the primary points available in 9.11 or, if the applicant simultaneously qualifies for a higher award of primary points, an award of the secondary points available in 9.24.

IV. Low Welfare Need

This will be awarded to households whose welfare needs are comparable to those listed below:

- Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support. This level of priority will be given where the absence of that care and support would have a slight effect on the relevant person's wellbeing and independence. An example of this would be a person who would not require a care package from Adult Social Care if the informal care and support was absent, but where that care and support still enhances the relevant person's wellbeing and independence.
- Those who are currently serving in the regular armed forces or who were serving in the regular forces at any time in the five years preceding their application for an application of social housing.
- Where the applicant is unable to live with their partner (as defined in 8.2) or a dependent child (as defined in 8.3 and 8.4) due to a lack of suitable accommodation.
- Where the applicant is a parent whose child (see 6.18) does not live with them, but where the child is unable to visit the applicant due to a lack of space in their current accommodation (for example a studio flat or homeless hostel).
- Homeless applicants found to be in priority need under Part VII of the Housing Act 1996.
- Families in severely overcrowded homes which pose a serious health hazard (Part X Housing Act 1985 or HHSRS Band A). These points are awarded in addition to any overcrowding points that are due and are intended to give additional preference to the most severe cases.

This award does not result in an entitlement to reasonable preference and applicants with no other housing need will remain in the low priority group described in 9.16. All applicants can have their low welfare needs recognised by an award of the secondary points available in 9.25.

V. No Welfare Need

Households where it is assessed that current housing conditions are having a minimal adverse effect on the applicant's or a member of their household's welfare will not be entitled to any additional priority.

The Points Matrix

9.46 The primary and secondary points described in 9.4 – 9.45 are presented in the matrix table below. The table also indicates which primary points groups may receive awards of which secondary points.

| City of London Allocations Scheme | | Secondary Points | | | | | | | | | | | | | | | | | |
|-----------------------------------|----------------|------------------|---------------|-----------|----|----|---------|----|----|-------------------------------|-----|----|-----------------|-------------|--------------------|---------------------|----------------|----------------|-----------|
| Primary Group | Primary Points | Overcrowding | | Wellbeing | | | | | | Unsuitable Housing Conditions | | | | | Housing Management | | | | |
| | | Per room lacking | Mixed sharing | Medical | | | Welfare | | | Sharing | | | Lack of tenancy | Bedroom Cap | Long TA stay | Advice & Engagement | Intentionality | Decant Urgency | |
| | | | | S | M | L | S | M | L | F | 1-4 | 5+ | | | | | | | |
| Management Transfer | 800 | | | | | | | | | | | | | | | | | | |
| Under-occupation | 400 | | | 50 | 25 | 10 | 50 | 25 | 10 | | | | | | 50 | | | | 100 / 200 |
| Severe Medical / Welfare | 275 | 25 | 10 | 50 | 25 | 10 | 50 | 25 | 10 | 5 | 10 | 15 | 5 | | | | 15 | minus 50 | |
| Severe Overcrowding | 250 | 25 | 10 | | 25 | 10 | | 25 | 10 | 5 | 10 | 15 | 5 | | | | 15 | minus 50 | |
| Studio Upgrade | 250 | 25 | | | 25 | 10 | | 25 | 10 | | | | | | | | | | |
| Decants | 225 | 25 | 10 | 50 | 25 | 10 | 50 | 25 | 10 | | | | | | | | | | 100 / 200 |
| Moderate Medical / Welfare | 225 | 25 | 10 | | 25 | 10 | | 25 | 10 | 5 | 10 | 15 | 5 | | | | | minus 50 | |
| Moderate Overcrowding | 200 | | 10 | | | 10 | | | 10 | 5 | 10 | 15 | 5 | | | | | minus 50 | |
| Homeless | 140 | 25 | 10 | 50 | 25 | 10 | 50 | 25 | 10 | | | | | | 150 | | minus 50 | | |
| Lower Income City Connection | 100 | | | | | 10 | | | 10 | 5 | 10 | 15 | 5 | | | | | | |
| Sons and Daughters | 50 | | | | | 10 | | | 10 | | | | | | | | | | |
| Low Priority | 1 | | | | | 10 | | | 10 | 5 | 10 | 15 | 5 | | | | | | |

Key

Secondary Wellbeing Points: S = Severe M = Moderate L = Low

Secondary Sharing Points: F = with family 1-4 = with 1-4 non-family 5+ = with 5+ non family

| | |
|--|--|
| | A green background indicates that points are routinely available for applicants in this primary points group |
| | A yellow background indicates that points are available to applicants in this primary points group in exceptional circumstances only (described below) |
| | A red background indicates that points are unavailable to applicants in this primary points group |
| | A blue background indicates that applicants who qualify for these secondary points will instead automatically be rebanded into a higher primary points group |

- The circumstances in which secondary medical or welfare points can be awarded to applicants with medical or welfare primary points are described in 9.37, 9.43 and 9.44.
- All applicants in the Severe Overcrowding group have at least two bedrooms lacking. Therefore secondary points for 'per room lacking' will only be awarded for the third and any subsequent bedrooms lacking.
- Couples registered for a Studio Upgrade will receive secondary points for one bedroom lacking.
- The law requires temporary accommodation to be suitable for a homeless household's needs. This means that severe overcrowding, medical and welfare issues should not arise for households in temporary accommodation. Where they do arise secondary points may be awarded to reflect this. The City Corporation will, whenever possible, offer alternative temporary accommodation.

Prioritising Applicants

- 9.47 When a property becomes available for letting, Housing Needs Officers will first determine whether it is suitable for any applicant on the list for a Direct Offer (see section 11). Generally, a property suitable for a Direct Offer applicant will be offered to them. Alternatively it will be advertised to applicants registered for Choice Based Lettings.
- 9.48 Applicants registered for Choice Based Lettings will be able to place bids following the process outlined in section 10.
- 9.49 Once the bidding cycle is complete, Housing Needs Officers will create a shortlist of applicants who may be able to view the property. The shortlist will prioritise the applicants with the highest points totals.
- 9.50 Where two or more applicants have equal points totals, officers will prioritise the application with the earliest priority date.
- 9.51 A priority date is normally the date an applicant was first registered into their current primary points group.
- 9.52 If an applicant moves into a higher primary points group at any stage, their priority date will be reset to the date they moved into the higher group. If the applicant later moves back down to the lower group, their priority date will revert to the date that applied when they were previously in that lower group.
- 9.53 For example, an applicant joins the Sons and Daughters group on 01/01/2016 and this is their priority date. They later accept a job in the City earning £14,000. On 01/01/2017 they are moved up into the lower income City connection group and this is their new priority date. On 01/01/2018 they give up this employment. Lower income City connection priority no longer applies and they must revert to the Sons and Daughters group. They can also revert to their original priority date for this group, 01/01/2016.
- 9.54 There is an exception to this rule for the Homeless primary points group. An applicant's priority date will automatically be reset to the date their homeless application was decided, even if they were previously in a higher primary points group and had an earlier priority date.
- 9.55 Decants and returning tenants also calculate their priority dates differently. Their priority date will be the date they signed their tenancy agreement at the property they are being (or in the case of returning tenants, were) decanted from. This gives greater priority to those who experience more disruption from the decanting process.

10: The Lettings Process

10.1 Applicants who are accepted onto the Housing Register (and who are not excluded from bidding in 11.3) will be able to express an interest in a suitable vacancy by making a bid. A guide to Choice Based Lettings explaining the bidding process will be sent to all applicants who are registered for Choice Based Lettings.

10.2 Vacancies will usually be advertised in the following locations:

- the City Home Connections website
www.homeconnections.org.uk
- the City of London Corporation Estates Offices

Each vacancy will have information on the location, size and type of property, rent and service charge levels and any criteria which applicants must satisfy in order to be eligible for shortlisting.

10.3 Each bidding cycle begins on a Thursday morning and closes the following Monday at one minute to midnight. There will not always be properties available for bidding.

10.4 Applicants who bid for a property will be prioritised based on the criteria detailed in section 9.47-9.53. The applicants with the highest priority will be shortlisted to view the property.

10.5 Applicants will not be able to express an interest in a vacancy for which they are not eligible. An applicant will be excluded from a shortlist on the following grounds:

- the applicant is not eligible in accordance with the bedroom standard and type of accommodation
- the applicant does not satisfy the advertising criteria included in the advert
- the applicant is under investigation for fraud
- the applicant is a transfer tenant with high rent arrears
- the applicant has notified the Housing Needs Team about a change of circumstances but is yet to provide adequate proof
- the letting has been designated as sensitive (see 10.8) and the applicant does not match the required criteria.

10.6 The Housing Needs Team will be responsible for contacting successful applicants, normally within five working days with additional detail of the property, a potential tenancy commencement date and details of how to view the property.

- 10.7 If the applicant with the highest priority on a shortlist refuses the offer, cannot be contacted or does not arrange to view the property within five working days, unless otherwise agreed, then the property will be offered to the next eligible applicant on the shortlist.

Sensitive Lettings

- 10.8 Occasionally a property becomes available for letting which should be let sensitively because of the vulnerability of neighbours. In these cases, bidders may be excluded from the shortlist if they are known to have a history of behaviour that is likely to be detrimental to the wellbeing of the vulnerable neighbour.
- 10.9 Conversely, a neighbour of a property being let may have a history of behaviour which may mean it is necessary to avoid letting the property to a person who is vulnerable. In these circumstances, vulnerable bidders may also be excluded from the shortlist.

Choice Based Lettings Refusal Policy

- 10.10 Applicants are expected to accept or reject an offer of a property at the time of viewing. Applicants who refuse three offers of suitable properties, for which they have bid, will have their application reconsidered. If the City Corporation believes that all offers were reasonable for the applicant, then the applicant will either not be able to bid for properties for a 12 month period or will have their application cancelled. The 12 month period will begin at the date of the refusal of the third property or the date of any subsequent reconsideration or review decision.
- 10.11 The Corporation will discharge its statutory duty if applicants who have been placed in temporary accommodation, provided by the Corporation refuse one offer of suitable accommodation. This could be social or private rented housing.
- 10.12 Applicants who have been awarded additional points due to their current unsuitable accommodation and who refuse a suitable and reasonable offer of accommodation may have their points reduced as per 9.31.
- 10.13 Applicants have the right to request a review or reconsideration of any decisions to suspend bidding or remove priority (see 15.1 to 15.3).
- 10.14 Applicants who are made one suitable and reasonable Direct Offer of a property and refuse it will normally not be considered for another Direct Offer. The Direct Offer refusal policy is discussed in more detail in 11.5 – 11.9.

Allocation to Housing Association Homes

- 10.15 Housing association homes to which the City Corporation has nomination rights will be advertised in the same way as City Corporation properties. Where an applicant is successful they will be subject to the lettings policies and procedures of that housing association, including their assessment of bedroom needs and affordability requirements.
- 10.16 Applicants who take up a tenancy through a nomination to a housing association will have their application to the City Corporation's Housing Register closed.

Help with registering and bidding for properties

- 10.17 Some applicants may need help with registering for housing and bidding for properties. The housing register application form includes a question asking whether an applicant may have difficulty in applying and bidding for a property themselves and whether they have someone who can help them.
- 10.18 Officers will work with the applicant to identify someone appropriate who will act as their nominated helper. Applicants who need help or training to register or bid for properties should contact the Housing Needs Team using the contact details at the end of this document.

Signing a tenancy

- 10.19 All City Corporation tenants will be given an introductory tenancy, normally for a period of 12 months. If there are no breaches of the tenancy agreement and no rent arrears at the end of the 12 month period, the tenancy will be converted into a secure or a fixed term tenancy. Further information is available in the City Corporation's Tenancy Policy.
- 10.20 New tenants will be asked to pay four weeks rent in advance at the time they sign their tenancy agreement, at which stage they will be given the keys to the property.
- 10.21 Transferring tenants will be expected to clear any outstanding rent arrears for their current property before a tenancy agreement for a new property will be offered.
- 10.22 All City Corporation properties are unfurnished and do not include white goods, curtains or floor coverings.

11: Allocations made outside of this process

Direct Offers

- 11.1 The Corporation will aim to maintain the integrity of the allocation of property as set out above. However, there will be occasions where properties are not advertised via Choice Based Lettings and direct allocations are made to applicants who have not made bids.
- 11.2 The following categories of applicant will be awarded points and will be able to bid but may also be made one direct offer of accommodation:
- I. **Specialist medical needs**
One direct offer may be made where the applicant requires specialist or adapted accommodation, or a ground floor or stair free property and a suitable unit has been identified.
 - II. **Managing temporary accommodation**
One direct offer may be made to homeless households where this is necessary to manage the use of temporary accommodation and to enable the City Corporation to meet its statutory homeless duties.
 - III. **Management transfers**
One direct offer may be made to any applicant who has a City connection and who faces a critical and immediate need to move to avoid hardship.
- Decants**
- IV. One direct offer may be made where a tenant subject to a decant has been unable to secure alternative accommodation via choice based lettings and where vacant possession of their current home is urgently required.
- 11.3 The following categories of applicant will not be awarded points, will not be able to bid and will only receive an offer of accommodation by direct offer:
- V. **Sheltered accommodation**
The City Corporation does not operate a Choice Based Lettings system for sheltered accommodation. Applicants for sheltered accommodation will receive one direct offer of suitable accommodation. Further information is available in section 13.

VI. Care leavers

Young people who have been looked after by the City Corporation and placed in care for thirteen weeks or more prior to their eighteenth birthday, who now require independent accommodation, will receive one direct offer of suitable accommodation.

During the application process they will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements.

VII. Exceptional support needs

The Housing Register is aimed at households seeking general needs social housing or low support sheltered/retirement housing.

If the City Corporation determines that an applicant would not be able to maintain a social tenancy in an appropriate manner because of the extent of their support needs, and support needs were so high that support could not be provided in the property, then the applicant may be referred to Adult Social Care for assessment.

During the application process they will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements.

If general needs housing later becomes suitable for the applicant, they may re-join the register and will be eligible for a direct offer under 11.3.VIII.

VIII. Move-on from supported housing

Applicants who have lived in supported housing and who are now ready and able to maintain a social tenancy in an appropriate manner will be made one direct offer of suitable general needs housing.

During the application process they will meet with a member of the Housing Needs Team, along with their Social Worker, to discuss their requirements.

IX. Tied accommodation

Retiring City of London Corporation employees who have been in tied accommodation and who are entitled to local letting preference under section 6.8 – 6.10 will be made one direct offer of suitable accommodation.

X. Right to Move

The City Corporation may be approached by a tenant in social housing in another area who is seeking a move in order to avoid hardship and to take up work or be closer to work. The City Corporation will in any single financial year make up to one per cent of its voids available to this group. Hardship and employment or the offer of employment must be verified. Where the City Corporation agrees to accommodate such a household, one direct offer of a suitable property will be made.

XI. Reciprocal agreements

From time to time the City Corporation may agree to offer accommodation to a household on another housing authority's waiting list, in exchange for nomination rights to a similar home in that authority's housing stock. Any such households will receive one direct offer of suitable accommodation.

- 11.4 In cases where a direct offer of accommodation is to be made, officers will consult applicants on their preferences on the type and location of accommodation and will aim to provide an offer that meets these preferences where possible.

Direct Offers Refusal Policy

- 11.5 In most cases, only one Direct Offer will be made. As per the refusal policy (see 10.10 – 10.14) applicants who are made one suitable and reasonable Direct Offer of a property and refuse it will normally not be considered for another Direct Offer.
- 11.6 Applicants who refuse a suitable Direct Offer under 11.2.I or 11.2.III will still be able to bid through Choice Based Lettings but will not normally be made another Direct Offer and may see their priority reduced as per 10.12 and 9.31.
- 11.7 The Corporation will discharge its duty to applicants who refuse a suitable Direct Offer under 11.2.II as per 10.11.
- 11.8 Applicants who refuse a suitable Direct Offer under 11.3 will have their applications reassessed. If they are a qualifying person and can demonstrate sufficient preference, they will be able to bid for a home through Choice Based Lettings. Applicants who are either do not qualify or do not have sufficient preference will have their applications closed.
- 11.9 Applicants have the right to request a review or reconsideration of any decisions to suspend bidding or remove priority (see 15.1 to 15.3).

12: Statutory homeless households

- 12.1 The City Corporation will give households to whom it owes a full homelessness duty (under Part VII of the Housing Act 1996) reasonable preference within this policy.
- 12.2 Homeless households who are not in priority need will receive an award of the primary points available in 9.13.
- 12.3 Homeless households who are in priority need and are not intentionally homeless will receive an award of the primary points available in 9.13 and the secondary points available in 9.25.
- 12.4 Homeless households who are in priority need but are intentionally homeless will receive an award of the primary points available in 9.13 and the secondary points available in 9.25, less the secondary points deductible in 9.31.
- 12.5 The full homeless duty will be discharged if a homeless applicant successfully bids for a property. However, in line with its Homelessness Strategy, the City Corporation will also seek to discharge its full homelessness duty where it can secure a reasonable offer of accommodation in the private rented sector. In this circumstance the household's Housing Register application will be suspended for two years, after which it will be closed, or reactivated should the private rented sector tenancy come to an end during this period, through no fault of the tenant.

13: Older people's housing

- 13.1 The City Corporation does not operate a Choice Based Lettings system for sheltered accommodation and lettings to older people's housing are handled separately from general needs social housing.
- 13.2 The eligibility rules set out in section 3 are the same for applicants for sheltered accommodation.
- 13.3 Applicants for sheltered accommodation must meet a reduced set of qualifying criteria. These are as follows:
- Both male and female applicants must be over the State Pension age for women
 - Neither the applicant, nor any member of their household, owns in full or in part, a property in the UK or abroad, which they are not selling prior to taking up an offer of sheltered accommodation
 - Neither the applicant, nor their partner, holds, a secure, assured, flexible or introductory tenancy or a licence agreement with another social landlord, which they do not intend to surrender upon taking up an offer of sheltered accommodation
 - Neither the applicant, nor any member of their household, should have demonstrated unacceptable behaviour (see 4.5)
 - Applicants must complete a face-to-face assessment to ensure the low level of support provided in sheltered accommodation is appropriate for their needs
 - Applicants should normally be able to demonstrate a local connection to Greater London either through:
 - (i) current residence or substantial past residence
 - (ii) current and substantial family connections
 - (iii) substantial past employment
 - (iv) current and substantial cultural or community connections
- 13.4 Housing association homes to which the City Corporation has nomination rights may have additional local connection requirements.
- 13.5 Applicants for sheltered accommodation do not need to demonstrate that they are entitled to preference. All eligible and qualifying applicants will be accepted on to the waiting list.
- 13.6 Points are not awarded to applications for sheltered accommodation. Accepted applicants will be placed on a waiting list and direct offers of suitable accommodation will be made to applicants who have been on the waiting list for the longest time.

- 13.7 Applicants with an urgent need to move, such as those with a specific medical or welfare need, or those who are homeless or threatened with homelessness, will be prioritised.
- 13.8 Applicants who meet the allocations criteria for both general needs housing and sheltered housing may choose which waiting list they would prefer to be on.
- 13.9 Lettings in the City of London Almshouses are not covered by this policy. For information on the City of London Almshouses, including how to apply for housing, please contact the Housing Needs Team on the details given in 15.5.

14: Local Lettings Plans

- 14.1 Section 167 (2E) of the Housing Act 1996 (as amended by the Homelessness Act 2002) enables housing authorities to adopt Local Lettings Policies and Plans. The Code of Guidance states that these lettings plans could enable a housing authority to allocate to specific groups, whether or not they fall into the reasonable preference categories. However, it also states that reasonable preference categories must be taken into account overall and that local lettings plans should not discriminate either directly or indirectly on any equality grounds.
- 14.2 The City Corporation may seek to develop local lettings plans for new build properties to allow flexibility to make lettings outside of the overarching allocations policy.
- 14.3 Where the City Corporation considers that there is specific need to respond to local conditions, it will engage in and support the development of local lettings policies within its housing stock.
- 14.4 These policies will normally be time limited and the objectives may include targets to:
- increase the number of lets to those in employment or training
 - lower child density or balance the number and ages of children to avoid a large concentration of older or younger children
 - make the best use of stock allowing a level of under-occupation / over-crowding
 - enable new schemes to be allocated to a mixture of tenants in order to develop a sustainable community
 - enable the City to manage particular business needs
 - enable households to return to an area they left following a decant to allow redevelopment to take place
 - enable existing local residents to share in the benefits of any estate infill or regeneration schemes.
- 14.5 This list is not exhaustive and local lettings plans may be agreed in other circumstances where there is evidence that the local community would benefit from such a plan and there is no significant adverse impact on other communities.
- 14.6 All local lettings and scheme-specific plans will be subject to formal approval. Each will have clear criteria and possibly their own qualification requirements, which are openly published. When a property which is being advertised is subject to a local lettings plan, this will be stated clearly.

14.7 Any local lettings plan will be agreed for a limited time, after which it will be reviewed, and lettings will revert to the main allocations scheme if appropriate.

15: Reviews, Complaints and Advice

Reviews and Reconsiderations

- 15.1 Applicants can request a review or a reconsideration of a decision concerning their housing register application, allocation scheme decision or suspension from bidding.
- 15.2 A review is a request for the same information to be reviewed by a more senior member of staff. A reconsideration is a request to reopen the decision making process based on new information. Applicants must make a request in writing, to the Housing Needs Team at the address below:

The Housing Needs Manager
Housing Needs Team
Barbican Estate Office
3 Lauderdale Place
London
EC2Y 8EN

hadvice@cityoflondon.gov.uk

- 15.3 A request for a review or reconsideration must be made within ten working days of the applicant being informed of the relevant decision. Should an applicant require more time to provide new information, they should request a reconsideration within ten working days and agree a timescale for providing further information with the Housing Needs Team.

Complaints

- 15.4 The City Corporation is committed to providing you with the best possible service and to working with you to find a solution to your housing needs. If, however, you are not happy with the service you have received from us, you can make a complaint by emailing housing.complaints@cityoflondon.gov.uk

Advice and assistance

- 15.5 Anyone who requires advice or assistance with their housing situation can contact the Housing Needs team to discuss their housing options:
- by email - hadvice@cityoflondon.gov.uk
 - by telephone – 020 7332 3452/1237/1654
 - in writing

The Housing Needs Team
Barbican Estate Office
3 Lauderdale Place
London
EC2Y 8EN

15.6 Anyone who is homeless or threatened with homelessness should contact the Advice and Homelessness Officer:

- by email - homeless@cityoflondon.gov.uk
- by telephone – 0207 332 1804
- in writing

The Advice and Homelessness Officer
PO Box 270
Guildhall
London
EC2P 2EJ

15.7 If you have an emergency outside normal office hours, please call 0208 552 9587.