Carmarthenshire's Policy for Allocating social housing October 2016

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Overview

The aim of this policy is to set out clearly how we decide who gets social housing in Carmarthenshire.

It is the Local Authority's policy to allow applicants to choose the area in which they wish to be housed and express preference on the type of housing they wish to be considered for.

The allocation of social housing is governed by the law, but can include certain local priorities. These local priorities have been developed in consultation with members of the council, applicants, partners and the public.

Our priorities have been set out in two bands, A and B. Where applicants have the same priority status, allocations will be made based on local connection, community connection and time registered.

This policy sets out who is eligible for social housing and what we take into account when we make the decision. It covers how applicants can apply for and access social housing; the priority they will be given and the order in which any offer of social housing will be made.

This policy will not cover detailed operational procedures, which are contained in a separate procedure document available on request.

Developing this policy

Over the course of the past year, we have consulted widely which involved:

- Radio adverts to raise awareness of the policy proposed changes
- An online survey asking people to give their views on the draft proposals
- A telephone survey requesting views from people on the Register
- Extensive discussions with local housing associations & front line staff
- Discussions with key partners like Shelter Cymru and our Homeless Forum
- Meetings with members of the Council
- Expert views from our solicitors and consultants to ensure we meet our legal obligations

This policy has to meet our legal responsibilities and has been developed in accordance with the Housing Act 1996 (Part 6), the Housing (Wales) Act 2014, the Social Services and Well-being (Wales) Act 2014 and the Code of Guidance for Local Authorities: Allocation of Accommodation and Homelessness (Welsh Government, 2016) (referred to herein as the "Code of Practice").

We are committed to ensuring that our allocations and lettings are non-discriminatory and we aim to meet our obligations under the Equality Act 2010. This includes all applicants being able to access the service taking account of any vulnerability or specific needs.

An Equalities Impact Assessment has been undertaken as part of the development of this policy document. It is available online at www.carmarthenshire.gov.uk

To ensure we meet all of our responsibilities we will:

- Monitor the policy and its impact on equality and accessibility
- Meet information sharing and data protection requirements
- Deal with complaints in an appropriate and timely way

Key stages in being considered for social housing

There is a 5 stage process an applicant will go thorough prior to consideration for housing.

Stage 1 – Information, Advice and Application

Information on housing options can be found on our website - www.carmarthenshire.gov.uk where an enquiry can be made on-line.

We also have a team of dedicated housing advisors who will discuss individual housing needs and circumstances and give appropriate information, assistance and advice. This includes information about buying or renting a home or helping people to stay in the home they currently have. The team can be contacted on telephone number 01554 899389 or by mail via schoptions@carmarthenshire.gov.uk.

To speak to someone out of hours as an emergency phone 01558 824283.

After the initial enquiry and potential discussion, applying to join the housing register may be the most appropriate option.

We will accept a joint application and it will be treated as one application. The housing need of the full household will be considered in assessing a housing application. However, we do not accept multiple applications. No individual can have their name on more than one housing application at any one time.

Stage 2 – Eligibility

As part of the housing options discussion we will assess whether an applicant will qualify to join the Housing Register. We have to ensure applicants are eligible to join the register and rigorous checks are undertaken to ensure only those legally allowed to get social housing are registered. We need formal photo identification (e.g. passport, driving licence) and National Insurance Number. This will help us to make initial checks prior to registration. We will also collect information to help us ensure allocations are made fairly and in line with the Equality Act 2010.

There are some groups of people who *by law* **cannot** join the register regardless of their housing need or circumstances. These are people who:

- Come under various immigration rules and cannot claim housing help
- Live outside the Common Travel Area, (UK, Channel Islands, the Isle of Man or the Republic of Ireland) for tax purposes
- Do not have the right to live in the UK
- The Secretary of State has decided are not eligible for housing.

Those who have been guilty of unacceptable behaviour¹ will not be registered. This is where we are satisfied that an applicant (or a member of an applicant's household) is guilty of unacceptable behaviour serious enough to make them unsuitable to be a tenant. This may be because of the following:

- Non payment of rent
- Breach of former tenancy conditions
- Conduct causing nuisance or annoyance
- Using the property for illegal/immoral purposes

Anyone over the age of 16 can apply to join the register. Prospective tenants will be assessed in terms of their ability to manage a home. This may include a referral to our Children's Social Services team or other organisations who work with young people, who may make a recommendation regarding an applicants' suitability. Any tenancy for a person under 18 will be held in trust (after which they can legally hold a tenancy in their own right). This means that another suitable person (such as a parent, legal guardian, carer, social worker or relative) will be responsible for the property in the meantime.

Once registered an applicant can be considered for a home by us and the following participating housing associations:

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Under section 160A(7) & (8) of the 1996 Housing Act.

- Bro Myrddin Housing Association
- Family Housing Association
- Pobl Housing Association
- Wales and West Housing Association

These associations have voluntarily signed up to this policy to ensure that all applicants applying for social housing have a single application process and are assessed using the same criteria. We work together with the aim to ensure all homes are allocated according to this policy.

Stage 3 – Priority

Social Housing is only allocated to people who have been accepted onto our housing register. Once eligibility to join the register has been confirmed, some applicants will be placed into one of two priority bands². This is dependent on the applicant's housing need and circumstance. For both bands, priority is given to people with a local connection to Carmarthenshire, a community connection within Carmarthenshire and the length of time that they have been registered on the register.

When assessing an applicant's housing needs consideration will be given to Appendix 3 of the Code of Practice to ensure that those with reasonable and additional preference are given adequate priority for housing.

The bands are as follows:

² This policy has been framed in accordance with section 167(2) of the Housing Act 1996, which permits local authorities to give additional preference to applicants who have urgent housing needs.

Band A – Urgent Housing Need (Additional Preference)

Homelessness

 Applicants who have been assessed under Part 2 of the Housing (Wales) Act 2014 and a section 75 duty has been accepted.

Urgent medical or welfare grounds

- The applicant will need to move due to high risk or life threatening grounds which will not improve until more suitable accommodation is offered. This will require an assessment by an Occupational Therapist who may recommend moving to a more suitably adapted home.
- The applicant or a member of the same household who is a veteran and has seen active service within the armed forces and is suffering from post-traumatic stress disorder or serious illness directly related to service in the forces.

Insanitary, overcrowded or unsatisfactory housing conditions.

- The applicant is currently occupying a property where there is a statutory requirement to vacate due to a prohibition order/demolition order/compulsory purchase order.
- The applicant is living in seriously overcrowded conditions (an example is if the household are lacking two or more bedrooms).

Need to move due to hardship & under occupying

- Failure to move to a particular locality would result in hardship
- The applicant is currently under-occupying social housing in Carmarthenshire and needs to transfer to a smaller property due to the current property being unaffordable and remaining would result in hardship.

The Housing Act 1996 gives full detail of situations where applicants should be given additional preference and/or assessed under Part 2 of the Housing (Wales) Act 2014 and we will assess applicants in accordance with this legislation fully.

Band B – Housing Need (Reasonable Preference)

People who are homeless or threatened with homelessness. Examples being:

- Applicants who are threatened with homelessness within 56 days and may be in Priority Need.
- Applicants who have been assessed as homeless but not in priority need.
- Applicants who have been assessed as intentionally homeless and are not suspended from the housing register for unacceptable behaviour.³

People who need to move on medical or welfare grounds. Examples being:

- Applicants who need to move as their medical condition will not improve.
 The assessment is not based on the medical condition alone but how their
 current accommodation affects their health. This will include applicants
 living in a mobile home, caravan or converted vehicle.
- Applicants who need to move to provide or receive support and care as they
 cannot carry out day to day activities alone i.e. washing, cleaning and getting
 in and out of bed.
- An applicant who is currently under-occupying social housing in Carmarthenshire and wants to transfer to a smaller property.
- An applicant who wants to move from an adapted home that they no longer require. This would then benefit another household who requires this specialist type of property.

People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory conditions. An example being:

• The applicant is living in an overcrowded property and is lacking one bedroom.

People who need to move to a particular locality in the district of Carmarthenshire County Council, where failure to meet that need would cause hardship to themselves or others. An example being:

Applicant who is working but have an income under the threshold for Working Families Tax Credit (£16,000 in October 2015).

For those on the housing register who do not fall into these bands they will be considered as 'Registered Only'. These are applicants who are eligible to be registered, but have limited housing need; however they have expressed an interest in moving. They may be offered properties which have not been taken up by applicants from the two priority groups.

Stage 4 – Size, Type and Location

³ People who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) or 68(2) or who are occupying accommodation secured by any such authority under section 192(3).

We need to establish where an applicant wishes to live as well as the size and type of home they are looking for. As far as possible, we want to give choice to applicants and meet their aspirations as well as their needs.

Applicants are able to express a preference regarding the type of property and the area in which they would like to live. There is greater demand in some areas than others. An applicant may be asked about areas where they believe they cannot live due to fear of violence, harassment or domestic abuse.

Giving applicants a choice must be set against the legal need for us to resolve some applicant's housing situation and the high demand for housing in Carmarthenshire. We may not be able to meet every applicant's preferences.

Appendix 1 sets out the basis of which size property applicants will be considered for.

Stage 5 – Allocation

Those applicants with the greatest housing need will be considered first (Band A). Where a property becomes available to let, an officer of the authority will look at:

- The applicants that have selected that area
- The size of the property
- The type of property
- · Whether it has had disabled adaptations

When selecting applicants who meet the criteria of Band A or Band B, we will prioritise applications in accordance with the following prioritising factors:

| Prioritising Factor One | The Priority Band | BAND A applicants will be first, then BAND B, then registered only applicants. |
|------------------------------|----------------------------------|---|
| Prioritising Factor Two | The Local Connection Criteria | We will then sort by applicants who have a Local Connection (see appendix 2 for full details of local connection) |
| Prioritising Factor Three | Community Connection Criteria | If there is more than one interested applicant, we will sort by Community Connection (see appendix 2 for full details of community connection) |
| Prioritising factor Four | Time Registered | In the event that there still remains more than one applicant the final deciding factor will be the time spent on the housing register in the priority band |

There is a fifth prioritising factor which is if the applicant has the financial ability to resolve their own housing need. If an applicant shortlisted has enough financial resources to meet their own housing need, the applicant will have less priority for housing than another applicant who does not. An example is when people have sold their property and then join the register for re-housing.

The offer is made to the highest banded applicant (with local connection, community connection and time waiting used to help us to shortlist between people in the same Band).

Once an applicant has been identified for a property, we will carry out a further verification of their eligibility and priority to ensure all information is accurate and correct before a formal offer is made. An offer will not be made if:

- Since joining the register an applicant has become ineligible.
- The priority band was found to have been incorrectly awarded due to the information provided by the applicant.
- Circumstances have changed since the priority band was awarded and the applicant is no longer entitled to the same level of priority.

We will verify all applicant's details and request proof in certain circumstances to confirm the information given is correct. Failure to provide the required information may mean we will decline the offer.

It is the applicant's responsibility to keep us up to date of any changes to their housing needs or household make up. We need to ensure we have accurate details and failure to respond to contact will result in being removed from the Register.

It is an offence to give false statement or to withhold information in connection with making a housing application. Where there is evidence of such an offence we will initiate legal proceedings⁴ against the applicant and take steps to end any tenancy gained fraudulently. There are circumstances where allocations are made outside this process (Appendix 3).

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⁴ Under S.171 of the 1996 Housing Act it is an offence to give false statement or to withhold information in connection with making a housing application. Where there is evidence of such an offence the Council will initiate legal proceedings with a fine of up to £5000

Refusing an offer

Applicants who have refused a reasonable offer of accommodation will be removed from the register. If the circumstances change, applicants can reapply, but will be reassessed and their time waiting will start again⁵.

A suitable and reasonable offer of accommodation will mean:

- The property is the right size for the applicant's household
- The potential impact on education, employment, support and essential services has been fully considered
- The threat of violence or domestic abuse has been considered
- The property is located in an area chosen by the applicant.

There are times and circumstances when this may be varied. We may make a suitable offer outside an area of choice to ensure we meet our legal responsibilities with regard to homeless people, or to reduce the financial impact of providing temporary accommodation.

All formal offers to those accepted a duty under homeless legislation will be in writing.

There may be times when an offer is withdrawn. This may be done up to the point of signing a tenancy agreement. Examples of reasons when an offer may be withdrawn are:

- The property is not suitable for the household's needs
- The property fails to become available
- There is a concern for community safety
- It comes to light that information has been withheld
- It comes to light that the household or member of the household has a property related debt
- The offer has been made in error
- The household's circumstances have changed
- The property is required for an emergency
- It transpires that the rent would not be affordable.

Applicants who have accepted an offer of accommodation are prevented from reapplying for housing within 12 months, unless circumstances have significantly changed.

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⁵ Those households owed a homelessness duty under section 66, or s73, or s75 of the Housing (Wales) Act 2014 or applicants who are considered homeless within the meaning of Part 2 of the Housing (Wales) Act 2014, will be removed from the register and also bring to an end any statutory homeless duty owed under s66, s73 or s75 and they will be reminded of this consequence at the point the property is formally offered to them.

The Review Process

The applicant has the right to a review of the following decisions:

- The applicant disagrees with the decision not to place them in a band or disagrees with the band they have been placed in
- The applicant considers that a decision has been reached based on incorrect information
- The applicant has been treated as ineligible on the basis of their immigration status
- They have been treated as ineligible to join the register due to unacceptable behaviour
- They have refused a reasonable offer of accommodation.

Applicants must request a review of a decision within 21 days of being notified in writing. They must give reasons why they wish to have the decision reviewed including where they believe an incorrect decision has been made.

The review, which the applicant has a right to attend with a representative, will be carried out by a senior officer of the Council. The reviewing officer will not have been involved in making the original decision.

We will aim to complete and inform the applicant in writing of the decision within four weeks, after taking into account any additional information that has been provided. Alternatively, the applicant will be advised of any time extension required to make the decision. The applicant has the right to go to County Court, on 'a point of law' if they disagree with the review decision.

Councillors, RSL board members, staff and their relatives

The primary role of our councillors (as outlined in statutory guidance), is to develop and approve the policy and to hold officers of the authority to account for their actions.

Elected Members cannot be involved in assessing housing applications or the allocation of housing. However this does not prevent them from seeking or providing information on behalf of their constituents. Members will be informed of any vacant homes. When the property has been successfully allocated and occupied we will also inform local members (we will abide within the data protection restrictions and not share personal information).

Officers of the authority are responsible for applying this policy and allocating according to its rules. It is likely that separate officers will be involved in the assessment or applications and the allocation of housing. So having a clear policy will ensure consistency.

In order to ensure that the Council is treating all applicants fairly, any application for housing from Councillors or employees of Carmarthenshire County Council or associated persons must be disclosed. Canvassing is not allowed. These

applications will be assessed in the normal way but any allocation of housing must be approved by the Head of Housing and Public Protection. For Housing Associations they must have the allocation approved at a board level and make the Welsh Government aware of the allocation.

Publicising the policy

We will publish this policy and make it freely available. We will provide a copy free of charge to anyone who requests one as well as making it available online. Advice on the wording of this policy is available through the housing options and advice team on 01554 899389.

Changing the policy

The policy cannot be amended until copies of changes have been sent to the participating housing associations. They must have a reasonable opportunity to comment on the proposals.

All major changes will need to be approved by the County Council. We will notify in writing, and within a reasonable period, any major changes in policy to those it may affect. Any major changes will require a full and detailed consultation process for those potentially affected. Results of the consultation will be presented to the County Council and housing associations.

For minor changes to the policy, decisions will be delegated to the Executive Board Member for Housing.

A set of operational procedures which will underpin this policy document will be approved by Executive Board Member for Housing. For minor changes to procedure decisions will be delegated to the Head of Housing & Public Protection. The Partnership will be consulted prior to all changes.

Appendix One – location, type and size of property

Properties will be allocated which are appropriate to the size of the household. However, in some areas we may not have the size home to meet exact needs. To ensure we can maximise the use of the stock, an offer of a property may be made which is larger than would be made normally. In these circumstances we will ensure the applicant can afford the rent before making the offer.

| Household | Size | Property Type |
|--|-------|--|
| Single people/couples | 1 bed | Bedsit, 1 bedroom flat |
| Single people or couples 55 and over | 1 bed | Bedsit, 1 bedroom flat |
| | | 1 or 2 bed bungalows and sheltered housing |
| Household expecting their first baby (and in receipt of the MATB1 certificate) | 2 bed | 2 bedroom flats, maisonettes and houses |
| Household with one child ⁶ | 2 bed | 2 bedroom flats, maisonettes and houses |
| Household with two children of same sex aged under 16 years | 2 bed | 2 bedroom flats, maisonettes and houses |
| Household with two children of opposite sex where one is over 10 years | 3 bed | 3 bedroom house |
| Household with three or more children | 3 bed | 3 bedroom house 4 or 5 bedroom houses (if available as limited stock of this size) |

There are exceptions to this which are outlined as follows:

Older people's housing or 'Sheltered Housing' is normally reserved for those aged 55 years plus. This may vary in Extra Care Accommodation where the criteria may be based on care and health needs. For Local Authority Schemes, an assessment will be carried out by a Sheltered Scheme Officer. To be considered, people will normally:

• Be over 55, (although some schemes may have a higher minimum age requirement)

The household size requirement for pregnant applicants with children will need to be considered based on the ages of the children and if they would like be able to share with the expected child.

⁶ **Households with children** – this means a person in receipt of child benefit. We do not consider a requirement to provide a secondary home.

• Be able to evacuate the building by themselves in the event of a fire (for Council owned complexes)

The same priority arrangements are then applied.

Bungalows will be allocated to households with a family member over the age of 55. If there aren't applicants who meet these criteria other people will be considered below this age taking account of their circumstances.

Adapted properties will be allocated where a member of the household has been assessed by an Occupational Therapist and where it has been determined they require particular adaptations.

Financial hardship – Affordability assessments should be carried out to ensure every effort is made to ensure the homes offered are affordable.

Extra Care – These are specialist facilities for applicants who require support and care. The assessment will be made based on the Extra Care Facilities criteria.

Local Connection to Carmarthenshire

Local Connection is defined in Section 81 of the Housing (Wales) Act 2014.

A person has a local connection with the area because:

- the person is, or in the past was, normally resident there, and the residence is or was of the persons own choice.
- the person is employed there
- · of family associations, or
- because of special circumstances

Applications from applicants who do not have a local connection with Carmarthenshire will still be accepted onto the housing register. However your priority will be reduced.

The vacant homes will be let in accordance with housing need and priority. Where there are applicants of similar housing need local connection will be one of the factors used to sort and decide who is allocated the property.

Community Connection to an Area

Community connection to an area may be the area where an applicant lives. However, it can also apply to an area where they lived previously, have family living there, work closely to or have children in school close by. Applicants can select one area where they wish community connection to apply taking the following criteria:

- Applicants who have lived in the Community area for a continuous period of at least 5 years or more.
- Applicants who are working in the community area.
- Applicants who have previously lived in the community area for a continuous period but have had to move out of the area to access accommodation; and/ or have a close relative⁷ who has resided in the area for 5 years and it has been assessed they need to continue to live in the area in order to provide essential support.
- Serving members of the Regular Forces who have a community connection to the area i.e. previously lived here/ close relatives currently living here.

Community Connection Areas

 $^{^{7}}$ Close relative is defined as Mother, Father, Children or Siblings who have resided in the ward for a minimum of 5 years

Applicants will be classified as having a community connection to the following area groupings:

| Llanelli East | Amman Valley | Llanelli Town | Rural Central |
|----------------------|--------------|---------------|---------------|
| Llanelli West | Rural West | Lower | Llanelli |
| | | Gwendraeth | North/Rural |
| Gwendraeth | Rural North | Carmarthen | Ammanford |
| Llandovery/Llandeilo | | | |

If you can demonstrate any other reason that you have a connection with a different community area then we will offer flexibility to register you for that area. An example of flexibility is where you are living near the boundary of a community area for example within 1 mile.

These 'community connection area' groups are designed to give applicants choice over a wider area than just a single village or town. This helps balance need against areas with little or no social housing.

There are times when homes will be allocated outside of the banding priorities. In the interests of transparency we will keep these circumstances to a minimum. These are:

- Where there is a need to provide alternative accommodation for a tenant in order to carry out repairs or improvements to their home or where the tenant needs to be moved as part of a regeneration scheme and the tenant has chosen to remain
- Where there is a duty to re-house people following a compulsory purchase
- Mutual exchanges between social housing tenants (Council or Housing Association tenants)
- Where a tenant dies, and succession of the tenancy to members of their household applies. If the home they have gained succession for is bigger than they reasonably need they may be offered suitable alternative accommodation. Or if the homes they succeed is an adapted property they may be offered a suitable alternative to ensure we make the best use of our stock
- Where there is low/no demand for property
- Where an applicant is homeless and in temporary accommodation that would not be suitable for more than a short period of time or where we need to move applicants out of temporary accommodation to manage the budgetary implications.
- Where an existing tenant wishes to 'add' a joint tenant to their tenancy. If we are willing to allow the tenant to do so (which is at our discretion), the only way to put the tenancy in to joint names is to end the current tenancy and to grant a new joint tenancy in its place. In these circumstances we reserve the right to grant a new tenancy in the name of the joint tenants, without reference to the allocations policy.
- Where existing joint tenants wish to 'remove' one of their number from
 the tenancy agreement. If we are willing to allow the tenants to do so
 (which is at our discretion), the only way to put the tenancy in to the
 remaining tenant's sole name is to end the current tenancy and grant a
 new tenancy. Where such a request is made, we reserve the right to
 grant a new tenancy in the name of the tenant who wishes to remain at
 the property, without reference to the allocations policy.

There are other times when offers of accommodation will be made or impacted by other policies or operational or management requirements. These are permitted under section 167(2E) of the 1996 Act and we have categorised them as follows:

| Local Lettings | In some circumstances, particular areas may have a formally |
|----------------|--|
| Policies | agreed local lettings policy. A local lettings policy would be in |
| (areas) | place to make sure that homes in that area are given in a way that |

helps to tackle particular issues. To agree a local lettings policy it should be based on the following test:

Clear definition of what is to be achieved by the local lettings policy.

Clear evidence base to back up the need of the local lettings policy.

Any potential equality impact has been considered how long the local lettings policy is to be operational and when the local lettings policy is to be reviewed.

A local lettings policy must be approved by the Executive Board Member for Housing (council) or the RSL Board (Housing Association) before it can be put into place. It **must have** partnership approval to ensure any adverse unintended impact on other partner landlords are mitigated and the review period agreed.

An example is, when looking at new housing developments, a local lettings plan is required to ensure a sustainable community cohesion is sought. Preference can be awarded to transfer applicants to allow for a mix of tenants in a new area.

The Executive Board Member for Housing would need final sign off following partnership approval.

Sensitive Lettings (individual properties)

An individual property may be a 'sensitive let'. This could be where there is a confirmed history of antisocial behaviour or criminal activity at that property involving the previous tenant or members of their household. A property will only be named a sensitive let with the approval of the Head of Housing (council) or by a manager of equal seniority (housing association). If a property is a sensitive let, certain households will not be considered for that property. Once the property has been let it will no longer be classed as a sensitive let. Letting in this way should be as an exception and not the rule.

Exceptional circumstances

To preserve some degree of flexibility as permitted under s 3.67 of the Code of Guidance, the Head of Housing and Public Protection has delegated powers to make an emergency offer of accommodation. However this is rarely used. A detailed and evidenced report is maintained for inspection where this power has been used and should be reported to the Partnership.

Use of the above letting policies will be monitored to ensure that it is not; adversely impacting on the general lettings, dominating the preference categories nor being used inappropriately.

Other exceptions will involve:

Traveller sites – Accommodation needs for traveller families are assessed under section 101 of the Housing (Wales) Act 2014. If the assessment identifies needs within the area with respect of the provision of sites on which mobile homes may be stationed the Authority must exercise its powers in section 56 of the Mobile Homes Wales Act 2013. Regard has been given to the Welsh Government's publication, "Travelling to a better future" and its guidance on Managing Gypsy and Traveller Sites. The process for allocating a pitch would still be based on priority, local connection, community connection and time waiting if there were 2 or more interested applicants.

Adapted Accommodation – Some homes have been specially adapted to meet people's needs. This type of accommodation includes homes for the disabled and people with special housing requirements. To ensure we match people to adapted homes and make the best use of the accommodation we have available, an Accessible Housing Register (AHR) is also operated as part of the main register.

Specific housing needs are identified and assessed as part of the initial housing enquiry. As part of this process an assessment may be undertaken by an Occupational Therapist. The result of this assessment will dictate the level of need and the type of adapted property required.

Shared accommodation – shared lettings for young people (aged 18-35 years) may be allocated outside of the policy to allow the ability for some self-selection of fellow sharers. A local letting plan should be developed prior to allocation.