
Author**Title of Policy**Head of Lettings and
Income Protection

Allocations and Lettings

**Section**

Updated: April 2025

Housing

1 Policy statement

- 1.1. At Rooftop Housing Group (Rooftop) we are committed to delivering high quality allocations and lettings services that provide our customers with safe, clean, and pleasant environments in which to live and be proud of. Our aim is to enhance the quality of life for our customers by promoting active engagement with them, working with relevant stakeholders and by being a responsive landlord to contribute to the overall well-being of individuals and families.
- 1.2. This Policy outlines our approach to the management of our allocations and lettings, ensuring that we meet the relevant regulatory standards, our service represents value for money and that it meets the service standards agreed in consultation with stakeholders.

2 Statutory and Regulatory context

- 2.1 This document has been reviewed in line with the Regulator of Social Housing's (RSH) Tenancy Standard (April 2024) which states:
 - 2.1.1 Allocations and lettings – "Registered providers must allocate and let their homes in a fair and transparent way that takes the needs of tenants and prospective tenants into account".
 - 2.1.2 Mutual exchanges – "Registered providers must support relevant tenants living in eligible housing to mutually exchange their homes".
- 2.2 We have a range of other policies which should be read alongside this Policy including a Tenure Policy which gives details on the types of tenancy and licenses we provide and how these can be sustained and in what circumstances mutual exchanges can be arranged; and a Rent and Service Charge Setting and Management Policy which gives details on the types of rents and service charges associated with our homes.
- 2.3 This Policy has been developed to take into account a range of relevant UK legislation and regulation including:
 - Housing Acts 1985, 1988 and 1996
 - Town & County Planning Act 1990
 - Mental Capacity Act 2005
 - Equality Acts 2006 & 2010
 - Localism Act 2011
 - Modern Slavery Act, 2015
 - Welfare Reform and Work Act 2016
 - Immigration Acts 2014 & 2016
 - Homelessness Reduction Act, 2017
 - Data Protection Act 2018 and UK General Data Protection Regulation 2021
 - Domestic Abuse Act 2021
 - The 2024 Regulator for Social Housing Standards and in particular the Tenancy Standard.
 - Social Housing Allocations Guidance

3 Policy outline

- 3.1 We will, in accordance with the RSH's specific expectations for allocations and mutual exchanges:
 - 3.1.1 Co-operate with local authorities' strategic housing function, and their duties to meet identified local housing needs. This includes assistance with local authorities' homelessness duties, and through meeting obligations in nominations agreements.
 - 3.1.2 Seek to allocate homes that are designated, designed, or adapted to meet specific needs in a way that is compatible with the purpose of the housing.
 - 3.1.3 Develop and deliver services to address under occupation and overcrowding in our homes, within the resources available to us. These services will be focussed on the needs of our customers.
 - 3.1.4 Publish policies to include how we make use of common registers, common allocations policies, choice-based lettings and local lettings policies.
 - 3.1.5 Clearly set out and be able to give reasons for the criteria we use for excluding actual and potential customers from consideration for allocations, mobility or mutual exchange schemes.
 - 3.1.6 Develop and deliver allocations processes in a way which supports their effective use by the full range of existing and potential customers, including those with support needs, those who do not speak English as a first language and others who have difficulties with written English.
 - 3.1.7 Minimise the time that properties are empty between each letting. When doing this, we shall take into account the circumstances of the customers who have been offered the properties. Please see our separate Void Management Policy.
 - 3.1.8 Record all lettings and sales as required by the Continuous Recording of Lettings (CORE) System.
 - 3.1.9 Provide customers/licensees wishing to move with access to clear and relevant advice about their housing options.
 - 3.1.10 Subscribe to an internet based mutual exchange service, allowing:
 - 3.1.10.1 A customer to register an interest in arranging a mutual exchange through the mutual exchange service without payment of a fee.
 - 3.1.10.2 The customer to enter their current property details and the customers' requirements for the mutual exchange property they hope to obtain.
 - 3.1.10.3 The customer to be provided with the property details of those properties where a match occurs.
 - 3.1.11 Ensure the provider of the internet based mutual exchange service to which we subscribe is a signatory to an agreement, such as Homeswapper, under which customers can access matches across all (or the greatest practical number of) internet based mutual exchange services.
 - 3.1.12 Take reasonable steps to publicise the availability of any mutual exchange service(s) to which we subscribe, to our customers.
 - 3.1.13 Provide reasonable support in using the service to customers who do not have access to the internet.

4 Equality, Diversity and Inclusion: Principles

- 4.1 At Rooftop we are committed to creating and sustaining a diverse and inclusive environment achieving positive outcomes for potential and existing customers, our

colleagues and the wider community. Our commitments to our customers, colleagues and communities are detailed in our Equality, Diversity and Inclusion (EDI) Strategy. We are an organisation that values diversity, champions equality and inclusion. We demonstrate this through the activities and the services we provide. This means living by, working to and acting on our Values.

5 Vulnerability: Reasonable Adjustments

- 5.1 There are occasionally circumstances where we need to consider working outside of the parameters of this Policy. This may be where there are several complexities present, or where customers have vulnerabilities that may lead us to make reasonable adjustments to the way we apply this Policy. In such cases, a referral should be made to the Complex Cases Review Group via the Head of Housing, where any approach outside of this Policy (and potentially other policies) will be considered and recorded, if agreed. This will always be considered in the context of the Assessing and Supporting Vulnerability Policy.

6 Data Protection: Principles

- 6.1 Rooftop recognises the importance of protecting the personal data of our customers, colleagues, contractors and other stakeholders and our commitment to compliance with data protection laws and managing personal data responsibly. As an organisation, we are committed to ensuring everything we do with personal data follows the principles of lawfulness, transparency, fairness and accuracy whilst minimising the amount of data we collect and only using it for specific, explicit and legitimate purposes until we no longer need it.

7 Objective

- 7.1 The objective of this Policy is to set out our approach to allocating and letting our homes in a way that ensures that we comply with all relevant legislation (statutory, regulatory and common law) including the Regulator of Social Housing's required outcomes for allocations and mutual exchanges.

8 Routes into a Rooftop home

- 8.1 We use a variety of different ways to allocate our homes depending on the type of home and the persons(s) who are going to occupy it. Customers applying for housing with Rooftop must be aged 18 or over.
- 8.2 **Common Housing Registers, Common Allocation Policies and Choice Based Lettings (CBL)**
- 8.2.1 We will normally allocate the majority of our homes in accordance with the relevant local authority Housing Allocations Policy, which are frequently jointly agreed with neighbouring local authorities and other social landlords, who are working together to register housing need and allocate homes through a Choice-Based Lettings CBL partnership.
- 8.2.2 CBL partnerships currently operate in all the local authority areas where we provide homes. 'Housing for You' covers Worcestershire and Homeseecker Plus covers Gloucestershire. Here you will also find information on their allocation policies, which include who is eligible for housing, who is ineligible for housing and their rehousing priorities. Legislation determines who is not eligible to register.
- 8.2.3 Potential applicants can be people who are not already housed by Rooftop or be existing Rooftop customers or licensees who need to move to suitable alternative homes.
- 8.2.4 Eligible applicants can register their housing need directly on the CBL partnership websites and can receive help from local housing authority staff to do this.

- 8.2.5 These CBL websites allow us to advertise our homes when they are available for letting and allow applicants on the CBL housing register to express their wish to be considered for the homes that best meet their needs.
- 8.2.6 The partnership's housing criteria is then applied to determine who has the highest priority for rehousing and should, therefore, be considered for the available home.
- 8.2.7 These priorities help local housing authorities to discharge their responsibilities to assist people to meet their housing needs including those that are homeless and in priority need; those that are living in unsuitable housing for example, they are overcrowded; the home is not suitably adapted to meet their needs; or they need to move area for reasons such as employment or to provide care to, or receive care from, others.
- 8.2.8 We will assist by offering homes to applicants on the CBL register where we have assessed the application and confirm that the applicant also meets our eligibility and entry requirements (see section 8.4 below).
- 8.2.9 We will review the CBL partnership arrangements as circumstances such as legislation and regulation require this and to ensure it meets our customer and business requirements.
- 8.2.10 We will also aim to comply with any nomination agreements we have agreed with local authorities. These may affect the percentage of our vacancies that are offered through the CBL partnership website.

8.3 **Restrictions on what Rooftop can offer**

- 8.3.1 **General needs bungalows** - These homes will normally be advertised as being available for people 55 years of age and over, or those in receipt of disability benefits. General needs bungalows with two or more bedrooms can be occupied by families with children where one applicant is in receipt of disability benefits. This is to ensure older or disabled people are given priority for these types of accessible homes.
- 8.3.2 **Retirement living schemes** - These homes will normally be advertised as being available for those 55 years of age and over. This is to ensure older people are given priority for these types of accessible homes.
- 8.3.3 **Occupancy criteria** - When allocating our homes, we will use the size criteria determined by the Government for the purpose of assessing housing benefit/universal credit. This is to avoid either overcrowding or under occupation of our homes. There may be circumstances when we permit under-occupation, for example as part of a Local Lettings Plan (LLP) or where a property is difficult to let. In these exceptional cases, we will ensure that the applicant has the financial capacity to sustain the tenancy and that they understand the potential reduction in benefit/credit that may apply.
- 8.3.4 **Pets** - We recognise that an increasing number of our customers wish to keep pets and they can bring both physical and mental benefits. We will make it clear in our adverts whether the home is suitable for pets or not. The majority of our homes will be but may require our permission and may require customers to comply with certain requirements. Further information will be given in our tenancies and licenses.
- 8.3.5 **Local lettings plans (LLP)** - These are sometimes agreed with the relevant local authority to help create sustainable communities. We will regularly review existing plans with the appropriate local authority to ensure we are meeting local need and addressing any challenges such as anti-social behaviour. Any such restrictions will be included in our adverts.

- 8.3.6 **Planning Restrictions** - Some of our new or existing homes are subject to planning conditions with letting restrictions (sometimes referred to as Section 106 agreements under the Town & Country Planning Act 1990). These conditions can restrict what types of homes are built and under what circumstances they can be let or sold and to whom. Any such restrictions will be included in our adverts.
- 8.3.7 **Vulnerable Young People and Adults** - We define a vulnerable young person as “a person aged 16 or over whose ability to protect themselves from violence, abuse or neglect is significantly impaired because of their age, disability or illness,” and may include: those with additional support needs such as survivors of domestic abuse; a history of, or current issues with, drug and alcohol misuse; being in local authority care immediately prior to the allocation; mental ill-health; a physical or learning disability or a history of homelessness.
- 8.3.8 **Vulnerable young people (16 or 17 years of age)** will be able to bid for or be nominated to our homes subject to the local authority having a legal duty to rehouse them, a trustee and guarantor is in place who can countersign their tenancy/licence agreement; and evidence that support is in place to enable the young person to sustain their tenancy/licence.
- 8.3.9 **Vulnerable adults (18 years of age and over)** will be able to bid for and be nominated to our homes subject to the Local Authority having a legal duty to rehouse them, an appointee or a person with power of attorney; and guarantor is in place who can countersign their tenancy/licence agreement, if they lack the mental capacity to do so themselves; and support is in place to enable the vulnerable person to sustain their tenancy/licence.
- 8.3.10 We will work closely with guarantors, trustees, appointees and those with power of attorney, where applicable.
- 8.4 **Exceptions to CBL**
- 8.4.1 Some of our specialised homes may not be advertised on CBL websites and sometimes it will be necessary to step outside the normal choice-based lettings to deal with exceptional circumstances.
- 8.4.2 **Housing with Care** - Customers are normally selected via direct applications to either: the local housing authority, the local social services authority or direct to Rooftop. The applications are then reviewed and allocations are agreed at a multi-agency Allocations Panel chaired by Rooftop. The Panel will include the relevant housing authority, social services authority and care provider and will consider the applicant’s level of assessed need and risk. However, where demand is low, or where the Section 106 agreement requires it (see paragraph 8.3.6 above), we may decide to use CBL to advertise these homes.
- 8.4.3 **Homes for homeless people** - We provide a number of homes which homeless people can use as temporary accommodation. We manage these homes in partnership with the relevant local authority. It is the district housing authority who decide which homeless applicants are allocated this type of temporary accommodation.
- 8.4.4 **Homes for survivors of domestic abuse** - These safehouses provide temporary accommodation and support from the Domestic Abuse Service for survivors of domestic abuse. Survivors are referred to us from either the district housing authority or from partner agencies providing specialist domestic abuse support.
- 8.4.5 **Homes with intensive support** - These homes include accommodation and support for people with complex and enduring mental ill-health; ‘Housing First’ (the provision of accommodation with intensive support built around the client);

temporary accommodation for recovering addicts; and other temporary accommodation as agreed with the relevant local authority.

- 8.4.6 **Homes for keyworkers** - These homes or rooms are allocated to health care workers in accordance with the agreement we have with the relevant NHS Trust.
- 8.4.7 **Homes offered at market rents** - These homes are normally advertised and let through local letting or management agents.
- 8.4.8 **Homes which are difficult to let** - Where properties are difficult to let, for example, they have been offered and refused more than twice, we will advertise on social media, through external agencies and on our own website. Where appropriate we will also review it against the Disposals and Change of Use Policy.
- 8.4.9 **Homes for people whose current homes are undergoing major repair or regeneration** - When a home requires major works, is due to be redeveloped or is part of a regeneration scheme, a customer may need to move to an alternative home, preferably to another one of our homes. If this is not possible, we will liaise with other housing providers to find suitable alternative homes. The homes may be temporary (known as a 'Decant') or permanent and we will liaise with the customer throughout the process. The move may include us paying for home loss in line with the Compensation Policy, removal expenses and other associated costs, where applicable.
- 8.4.10 **Management moves** - We recognise that there are occasions when a customer will need to move urgently, such as survivors of domestic abuse, unsuitable allocations into housing with care, racial harassment, credible urgent risk to life or significant health reasons. This is not intended to give existing customers an unfair advantage over other applicants but does acknowledge that there are occasions when we will need to act outside of any established prioritisation scheme. The circumstances of each case will be considered and this may include rent arrears. Generally, we will not permit an internal transfer where any housing debt exists, however, we would seek to agree a repayment plan to enable further review. Such moves will be assessed and determined by a specialist Management Moves Panel and appropriately recorded.
- 8.4.11 **Releasing family accommodation** - Because the demand for family accommodation is so great, and to assist us to make best use of our properties, where a customer is wishing to move because their home is too big for their needs, we will work with that customer to provide incentives to move to a smaller property. If eligible, we may assist with moving costs, purchasing of items to help set up their new home, or the clearing of small rent arrears from accounts to become eligible to move.
- 8.4.12 **Sites for Gypsies, Romany and Travellers** - Where we are allocating pitches on one of our Gypsy, Romany and Travellers sites, these are normally allocated from nominations supplied by Local Authorities. Customers must be aged 18 or over.
- 8.4.13 **Homes for our colleagues and close relatives** - Our Scheme of Delegation specifies that our Executive Director - Operations has delegated authority to approve decisions to allocate homes to rehouse or transfer colleagues (other than members of the Executive Team) and/or their close relatives in accordance with our Allocations and Lettings Policy, Home Ownership Policy and Probity Policy.
- 8.4.14 **Homes for Refugee resettlement** - To assist the Government and our local authority partners with resettling refugees, we do offer a small number of homes to refugees nominated by the Government and supported by our local authorities. They have been granted indefinite leave to remain in the UK and have been given the right to rent by the Government.

8.4.15 Mutual exchanges - We are committed to promoting and supporting customer mobility and to address under-occupation and over-crowding. This will include providing information and advice to customers who wish to move to another home, including advice on seeking a mutual exchange with another customer, in our own homes, or homes managed by another housing provider. This is usually by way of assigning (or transferring) their current tenancy to the other tenant although, in certain circumstances, the latter may require us, or we may choose, to take a surrender of the existing tenancy and offer a new tenancy. Further information on mutual exchanges, including any reasons for refusal, is given in our Tenure Policy. Our current internet based mutual exchange service provider is [Homeswapper](#) with whom we have a contract giving free access to this service for our customers.

8.4.16 Other assignments and successions - In certain circumstances, customers have the right, or we have the discretion, to allow other members of the family to take over responsibility for their existing tenancy. This can be because of a court order or because other members of the family would have succeeded to (or inherited) the tenancy on the customer's death. Further information on assignments and successions is given in our Tenure Policy.

8.5 Exclusion/refusal of applicants

8.5.1 We will consider each case on an individual basis and make every effort to resolve any possible ineligibility.

8.5.2 The reasons an application may be declined or deferred whilst a recovery plan is put in place, may include, but are not limited to the applicant:

- Being subject to immigration control and who are not eligible for housing.
- Having no recourse to public funds and who do not have the financial means to sustain a tenancy.
- Or a member of their household has had action taken against them for anti-social behaviour.
- Having been evicted for any breach of tenancy in the last three years.
- Owing money to a former landlord unless they have an agreement to clear the debt. Existing Rooftop customers are usually required to have a clear rent account before they can move.
- Being convicted of a serious criminal offence where due to the nature of the offence and the risk assessment, it is not safe to house them (this does not apply to those convictions that are legally spent or are covered by the Rehabilitation of Offenders Act 1974).
- Having given false information in relation to their housing application. It is a criminal offence if an applicant withholds or provides false information in relation to their housing application. For further information please read our Tenancy Fraud Policy.
- Being deemed unlikely to be able to sustain a tenancy or licence, following a financial assessment. In such circumstances, the applicant will be encouraged to engage with relevant support services.
- Having care needs which are incompatible with the service available in their chosen accommodation.

9 Tenancy / Licence sustainment

9.1 Tenancy / Licence sustainment refers to a customer's ability to successfully manage a tenancy or licence independently or with support. We will do all we reasonably can to help customers and licensees to sustain their tenancies and licenses.

9.2 Pre-tenancy / Licence assessment

- 9.2.1 All applicants will be required to undergo a thorough assessment process to determine their suitability for the home they are being considered for, including:
- The applicant's right to rent if a local authority check has not been completed.
 - The applicant's economic/financial status (including any benefit restrictions that may be in place).
 - The applicant's support needs, in particular, for all our types of supported housing.
 - Any other factors which may determine how easy it is to sustain their tenancy/licence.
 - References from landlords for all former tenancies/licences held by the applicant for the previous five years.
 - Permission may be sought from the applicant to carry out a credit check. Applicants will be required to pay one month's rent in advance (a degree of discretion may be applied according to individual circumstances).
 - The applicant's ability to make future rent payments via direct debit and to build up a credit of at least one month's rent / licence fee over time, regardless of their income. Arrangements will be discussed at offer stage with payment taken at sign-up. A small amount each week can be added to any Direct Debit arrangements to build up this credit. This will be explained to the applicant.
 - Verifying the applicant's identification documents. We will require two forms of identification, one of which must include a photograph. This will also help us to ensure that we comply with our Anti-Slavery and Human Trafficking Statement.
 - The applicant's access to furniture and household items. Advice will be given on our Emergency Assistance Fund and other sources of financial help, where required.
 - The applicant's understanding of their housing rights and responsibilities.
- 9.2.2 Failure to provide all the required information/documentation or providing false information, will lead to their application being rejected.
- 9.2.3 **Existing customers/licensees** – all existing customers/licensees who are considered for a move internally will be subject to additional checks to confirm that they have fully adhered to the terms of their existing tenancy/licence and will be required to give the required notice on their existing tenancy/licence as per their tenancy/licence agreement. Additional checks will include the following:
- An assessment of the condition of their existing home. Failure to meet Rooftop's standards will result in any application to transfer being declined until such time as works have been undertaken to bring the property up to the required standard.
 - An assessment of whether there has been a breach of any other tenancy/licence condition. Failure to meet the obligations set out in our tenancy/licence agreements will result in any application to transfer being declined until such time as the breaches have been rectified.
- 9.2.4 Where we decline the applicant, the reasons for the decision will be explained and where this leaves the applicant at risk of being made homeless, we will work with the local housing authority to help prevent homelessness.
- 9.2.5 We will also provide details of our appeals and complaints procedure and signpost failed applicants to housing advice services.
- 9.3 **Ongoing support after letting**
- 9.3.1 All new customers will receive planned visits in their first year of tenancy/licence. Where a customer has been identified as vulnerable, we will continue to monitor

how well they are coping with sustaining their tenancy and offer help and advice where appropriate.

- 9.3.2 We will do all we reasonably can to help customers sustain their tenancy or licence in order to prevent unnecessary evictions.
- 9.3.3 After the first year, at least one contact is made with existing customers every two years to ensure that we know who our customers are and to keep customer information up to date. All frontline colleagues carry out regular visits in the course of their day-to-day duties.
- 9.3.4 In addition, we have a programme of periodic tenancy audits where we focus on those customers that we know to be vulnerable and/or where no recent contact has been received.
- 9.3.5 Customers in retirement living schemes and bungalows will receive annual visits to assess the suitability of their homes and to plan for their future housing needs.
- 9.3.6 Customers in specialist housing schemes, for example housing with care, temporary housing for the homeless including those fleeing domestic violence or leaving local authority care will receive more intensive ongoing support as necessary.

10 Recording and monitoring

- 10.1 After letting our homes, we will record the letting on the Government's Continuous Recording of Lettings (CORE) system.
- 10.2 We will regularly monitor the letting of our homes to ensure that our allocation and letting policies are being implemented and that we are complying with any allocation/nomination agreements we have in place with partners such as local housing, planning and social services authorities.
- 10.3 We will complete a regular review of allocations and lettings outcomes including mutual exchanges and management transfers in order to identify any trends. This will include a review of qualitative insight from lettings satisfaction surveys and complaints.

11 Review of decisions

- 11.1 Appeals relating to common housing register or choice-based lettings prioritisation will be managed by the relevant local council housing register appeal process.
- 11.2 Any applicant who is unhappy with a decision made by Rooftop can ask for a review. To enable reviews to be made swiftly, the appeal will be considered by the Head of Lettings and Income Protection and/or Head of Housing.
- 11.3 If the applicant is still unhappy with the decision, they can make a complaint. Please refer to our Customer Complaints Policy.
- 11.4 We will ensure our appeals process enables customers to make an informed decision as to whether to submit an appeal including how to seek independent advice and where required, representation.

12 Data protection

- 12.1 As the 'controllers' of any 'personal data' we hold about applicants and customers we are committed to data protection and upholding applicant's rights over their data by complying with all relevant data protection laws including the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) 2021.

13 Review

- 13.1 This Policy will be reviewed every three years or when any changes related to relevant government consultation papers, legislation or regulation, best practice take place, to ensure that the Policy is achieving its stated aims.

14 Consultation

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|------|---------------------------|------------|
| 14.1 | Leadership Team Sub-Group | N/A |
| 14.2 | Executive Team | April 2025 |
| 14.3 | Other (eg customers) | N/A |

15 Responsibilities

Responsible body

- | | | |
|------|--|--|
| 15.1 | Formulation, amendment and approval of policy | Executive Team |
| | Monitoring of policy | Leadership Team |
| | Operational management of policy/policy author | Head of Lettings and Income Protection |
| 15.2 | Date of formulation of policy | April 2013 |
| 15.3 | Dates of policy reviews | April 2025 |
| | | April 2024 |
| | | May 2022 |
| | | November 2020 |
| | | November 2019 |
| | | November 2018 |
| | | May 2017 |
| | | April 2016 |
| 15.4 | Date of next review | April 2028 |

Associated documents

Internal – Rooftop policies, procedures and processes

- Tenure Policy
- Rent and Service Charge Setting and Management Policy
- Capacity Policy
- Assessing and Supporting Vulnerability Policy
- Equality, Diversity and Inclusion Policy
- Probity Policy
- Customer Complaints Policy
- Anti-Slavery and Human Trafficking Statement
- Allocations and Lettings Procedures for general needs and supported housing
- Allocations and Lettings Process
- Housing Management System Manuals covering allocation, letting and assignments (including mutual exchanges)
- Equality Impact Assessment
- Home Ownership Policy
- Probity Policy
- Tenancy Fraud Policy
- Voids Management Policy
- Compensation Policy
- Disposals and Change of Use Policy

External

- Regulator of Social Housing's (RSH) Tenancy Standard (April 2024)
- As detailed at Section 2.3 of this Policy