



Title: Lettings (Common Housing Register) -
Sanctuary Scotland Procedure

Business Function: Housing Functions across Sanctuary Scotland

Author: Service Development Manager

Authorised by: Director - Sanctuary Scotland

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AG01 - Common Housing Register Guidance

AG02 - Choice Based Lettings Guidance

AG03 - Management transfer guidance

General Information

1. Objective of this procedure

- 1.1 This procedure provides an overview of how Sanctuary Scotland (Sanctuary) will allocate its properties in a fair and transparent manner which is compliant with relevant legislation.
- 1.2 This procedure relates to the [Lettings - Sanctuary Scotland Policy](#) and Additional Guidance.

2. Legislative/Regulatory context

- [A Housing Practitioner's Guide to Integrating Asylum Seekers and Refugees, Second Editions, Scottish Refugee Council](#)
- [Customer Contact, Complaints Handling and Compensation Procedure - Sanctuary in Scotland](#)
- [Data Protection Act 2018](#)
- [General Data Protection Regulation](#)
- [Data Protection - Group Policy and Procedure](#)
- [Equality Act 2010 and the Equality Act 2010 \(specific duties\) \(Scotland\) Regulations 2012](#)
- [Homelessness etc. \(Scotland\) Act 2003](#)
- [Housing \(Scotland\) Act 1987](#)
- [Housing \(Scotland\) Act 2001](#)
- [Housing \(Scotland\) Act 2001 'Homelessness Section 5: Guidance on Good Reason'](#)
- [Housing \(Scotland\) Act 2006](#)
- [Housing \(Scotland\) Act 2010](#)
- [Housing \(Scotland\) Act 2014](#)
- [Human Rights Act 1998](#)
- [The Legal Framework for Social Housing Allocations, Statutory Guidance for Social Landlords. Housing \(Scotland\) Act 2014 \(Scottish Government 2018\)](#)
- [Looked After Children \(Scotland\) Regulations 2009](#)
- [Management of Offenders etc. \(Scotland\) Act 2005](#)
- [Minimum Period for Applications to remain in force - Suspensions Under Section 20B of the Housing \(Scotland\) Act 1987. Statutory Guidance Housing \(Scotland\) Act 2014 \(Scottish Government 2018\)](#)
- [Scottish Government's Code of Guidance on Homelessness 2005](#)
- [The Scottish Social Housing Charter \(2017\)](#)
- [Scottish Government Social Housing Allocations in Scotland: A practice guide February 2019](#)
- [Suspending Housing Applicants: A Practical Guide \(CIH \(book\) 2009\)](#)

3. Responsibilities for implementation

3.1 The Area and/or Housing Manager in each office is responsible for:

- ensuring that this policy is implemented by their staff;
- ensuring that Officers are designated to deal with the allocation of properties;
- monitoring the systems and practices at local levels in terms of dealing with applications and allocation of properties, ensuring that there is a consistent, fair approach; and
- preparing Local Letting Strategies for approval by Committee.

4. What's new - What's different?

4.1 April 2024 - Formal review, with the following changes:

- Minor changes to text and format.
- Changes made to reflect changes in job titles.
- 10.3 and 18.3.2 have been amended to include new management transfer approval process.
- New **AG03** - Management transfer guidance has been added.

5. Definitions

5.1 The following definitions aim to support the user's understanding of this procedure.

<i>Common Housing Register (CHR)</i>	The waiting list for social rented housing in the North Lanarkshire and Inverclyde areas which has been developed in partnership with local registered social landlords who have properties within this locality. Applicants complete one application in order to apply for housing with numerous landlords participating in the CHR. The CHR has its own allocations or lettings policy which is applied in addition to the Lettings - Sanctuary Scotland Policy .
<i>Choice Based Lettings (CBL)</i>	A scheme which allows persons applying for social rented properties to bid for a house when it becomes vacant. Applicants must register on a CBL waiting list in order to view and bid for properties.

Detailed Procedures

A. Initial Enquiry

1. Providing information and advice

- 1.1 When an applicant enquires about making a housing application, staff should provide them with the following:
 - an overview of how to access housing via the Common Housing Register;
 - information about where to obtain an application form (online) or provide a hard copy to the customer if available. This may include a Housing Options Guide (for example see [North Lanarkshire guide here](#));
 - advise that they may need to complete a separate medical application form (unless staff know that the applicant does not have a medical condition); and
 - explain other means of accessing housing through for example mutual exchanges.
- 1.2 If an applicant asks for a copy of the [Lettings - Sanctuary Scotland Policy](#) this should be provided, but not the procedure.
- 1.3 Applicants may need help to complete a housing application, for example people with literacy problems, non-English speakers or people with learning disabilities. If the applicant is enquiring in person or over the phone, staff should ask if they need assistance, and arrange for a meeting at the local office or a home visit if required. Staff could also use the acknowledgment letter to ask if help is needed once an application has been processed (where this is sent by Sanctuary).
- 1.4 The application forms contain a signpost for people to request the application form in another language or format such as Braille. Applicants should be made aware of this in case it is relevant for them, and should be signposted to North Lanarkshire Council or Inverclyde Council to obtain these.
- 1.5 When providing a service to applicants in person or on the phone, staff should offer to give information on turnover and demand so that they can make informed choices about which areas to apply for.
- 1.6 Demand outstrips supply for our housing and Sanctuary will not be able to provide housing for everyone. Information and advice should be provided on housing options in the local area, such as private renting, mid-market rent and shared ownership, if the person speaking with the applicant is comfortable with their knowledge in this area. Alternatively, staff should signpost people to their local authority for information on other housing options available to them. Most local authorities have good information on housing options on their website.

- 1.7 Applicants should also be informed about accessing housing via mutual exchange and national exchange schemes such as Homeswapper. For guidance on dealing with mutual exchange applications refer to the [Mutual Exchange - Scotland Policy and Procedure](#). Homeswapper is a national service which allows applicants to register for a mutual exchange. Users of the service can search on and view properties of other tenants who are looking for an exchange throughout the country. For further details on Homeswapper can be found at www.homeswapper.co.uk.

B. Receipt of application

2. Processing an application

2.1 Application forms are processed by:

- North Lanarkshire - the partner organisation who receives the application. This could be Sanctuary or another partner organisation of the CHR and will be referred to as the 'gatekeeper' throughout this procedure.
- Inverclyde - the Inverclyde CHR team who receive online applications. Applications can also be completed in the Inverclyde CHR office, or if the applicant is housebound, Future Skills can support the applicant to complete an application at home or in a local library.

2.2 Once forms are received, details are entered onto electronic systems to allow for a list to be generated based on the points system and categories as detailed in [AG01](#).

2.3 Applications will aim to be processed by any target timescales set out in [AG01](#) or in the respective CHR policies:

- [North Lanarkshire Housing Allocations Policy](#):
 - aim to input an application within five working days and contact the applicant if any relevant information is missing;
 - write to the applicant to let them know that NLC are assessing the application within 10 working days; and
 - send the applicant a letter within 20 working days telling them which group they are in and the number of points they have.
- Inverclyde:
 - aim to assess completed applications within 10 days of receipt and send the applicant a letter to confirm registration.

2.4 Applications may also be created for transfer applicants, referrals under Section 5 of the [Housing \(Scotland\) Act 2001](#), Health and Social Care Partnerships and other approved agencies.

3. Verifying information

- 3.1 It is important that the applicant's housing circumstances are properly assessed and to do this, applicants may be contacted for proof of current circumstances. This could be early on in the application process, or at the point of a pre-allocation visit. Where appropriate and possible, the gatekeeper (North Lanarkshire) or external CHR teams (Inverclyde) may request confirmation of circumstances direct from a third party who can provide this, or from the applicant.
- 3.2 For all applicants, standard verification information may also be required, including but not limited to two forms of identify such as a national insurance number, copy of passport, driving licence or birth certificate.
- 3.3 If verification information cannot be provided within a reasonable timescale, or is not provided at all, the application may be reassessed, and points removed. If it is found that false or misleading information has been provided, this could result in the application being suspended from the waiting list.

4. Missing information

- 4.1 If there is any verification information missing from the application, the applicant will normally be contacted by the gatekeeper, or Inverclyde CHR team to request this information. The application may be given a different status while this information is pending which may affect their position to be considered for an offer of housing.
- 4.2 For Inverclyde CHR, if there is no response to the request for missing information, the application will be activated based on the information already provided, and the applicant will be e-mailed to advise them of this.
- 4.3 For the North Lanarkshire CHR, an application may be cancelled if this information is not provided after the applicant has been contacted to request this information.
- 4.4 If the application is cancelled due to missing information, and the applicant subsequently provides the information, the registration date for their application will be the original date of application.

5. Checks on tenancy history

- 5.1 Checks may be carried out by the gatekeeper or the Inverclyde CHR team on the applicant's tenancy history over the past five years including if any rent is owed, if the applicant has behaved antisocially or has broken any part of the tenancy agreement with them.
- 5.2 If an applicant is at the top of the waiting list for North Lanarkshire CHR, or makes a bid for a property via Inverclyde CHR, staff should also check if the applicant is current or former tenant. If they are, Northgate and SAP should be checked for:

- rent arrears and or sundry debts owing to the Group and if there is a current payment arrangement in place for these;
- evidence of Antisocial Behaviour (ASB);
- evidence of previous convictions where the applicant has certain previous convictions; the applicant has had an order for recovery of possession on certain grounds made against them; and / or a previous tenancy has been terminated on the grounds of abandonment or neglect of the property;
- evidence of false, misleading or withheld information;
- if the applicant has intentionally worsened their own circumstances to promote their application for housing (which could be assessed at the point of a pre-allocation visit being completed);
- any other breaches of tenancy;
- evidence of two previous reasonable offers for Sanctuary properties being made and refused consecutively; and/or
- whether an applicant has been violent or aggressive towards staff.

5.3 Depending on the outcomes of the references, the gatekeeper or Inverclyde CHR team may suspend a housing application, or Sanctuary may refuse to offer the applicant a tenancy based on the reasons above. If the gatekeeper is Sanctuary and staff suspend an application, the applicant will not appear on our own shortlist but will appear on another partner organisations' shortlist within the CHR. For more information on suspensions see section 26 below.

6. Data protection

6.1 When recording information about an applicant, it is important to remember that applicants have the right to inspect any record Sanctuary holds about their application in accordance with the General Data Protection Regulation. It is important that only information relevant to the application is recorded. It is also important to remember that we hold a lot of confidential personal information, which must not be shared with any other person or organisation without the permission of the applicant. If you have any doubts over whether information should be recorded or shared then you should speak with your Manager and/or refer to the [Data Protection - Group Policy and Procedure](#).

C. Assessing an application

7. Eligibility

7.1 In Scotland, anyone can apply for housing if they are aged 16 or older. This includes all non-UK nationals (asylum seekers, refugees, EEA nationals, Commonwealth citizens and people subject to immigration control).

7.2 The house size applicants are eligible for is set out in the [Lettings - Sanctuary Scotland Policy, Section 8](#).

8. Awards - Points Based System

8.1 A points based system is used to list applicants in order of priority and within different categories. Details on this are described in the [Lettings - Sanctuary Scotland Policy](#) and [AG01](#).

9. Medical assessment

9.1 Where applicants think that they are in housing need on medical grounds, this requires assessment.

9.2 For Inverclyde, this includes the applicant completed a medical self-assessment which is a sub-form on the main application. This is assessed by the Inverclyde CHR team and medical points can be awarded at two levels ([Lettings - Sanctuary Scotland Policy](#) and [AG01](#)).

9.3 For North Lanarkshire, the gatekeeper will make the assessment. Where this is Sanctuary, staff should make an appointment with the applicant to complete as assessment. The following points should be considered when determining medical priority:

- The key consideration is not whether the applicant has a medical condition, but whether the applicant's current home is making their health or disability worse and re-housing would improve or stabilise their condition or would allow them to function more independently.
- Relevant medical conditions include functional difficulties, such as respiratory problems, physical disabilities and mental health problems.
- When thinking about whether rehousing would help applicants to function more independently, staff should consider whether they would benefit from being nearer to, and being able to access more easily, shopping facilities or transport links.
- Staff should explore options to adapt the applicant's current property so that they can continue to live there. If the applicant is a current Sanctuary tenant then we can refer to our own [Aids and Adaptations - Sanctuary Scotland Policy and Procedure](#). If the applicant is not our tenant, then staff can signpost the applicant to their local authority Social Work department. Where adaptations are carried out, staff should ensure that any medical priority awarded is updated to reflect this.
- For sheltered housing, priority is determined via a report run by North Lanarkshire Council when the applicant's form has been processed on the system. These sheltered tenants are also subject to banding rather than a points based system, for more information on this, staff or applicants should contact North Lanarkshire Council.

9.4 The distinction between how many points the applicant is given for medical reasons is a key decision which requires individual judgement as all individual applications will have different circumstances.

10. Applicants suffering from harassment or domestic abuse

- 10.1 If an applicant states that that they are experiencing harassment or domestic abuse on their application, this will be dealt with sensitively and confidentially to ensure their safety.
- 10.2 Applicants may be considered for a discretionary management transfer and applications should be advised of appropriate agencies to approach should they wish to do so. Staff should offer to refer applicants experiencing domestic abuse to the local Women's Aid, or an appropriate advice provider for men such as the Men's Advice Line (see [Catalogue of Advice Providers](#) for more information). If the applicant is a tenant of another social landlord staff may also suggest that they contact their landlord to help them deal with any issues The applicant should also be informed of their right to apply to their local council under the provisions of Homeless legislation.
- 10.3 Management transfers will be considered on a case by case basis. Housing Officer must complete the Management Transfer Approval form (**Appendix 2**) and submit it to the Area or Housing Manager for review. The Area or Housing Manager will consider the full implications of the transfer ensuring that the applicant's needs are taken into account and obtain approval from the Head of Housing. While supporting evidence from agencies will be considered as part of the management transfer application process, the final decision on whether to approve the management transfer rests with the Head of Housing. Guidance on management transfers is available on in **AG03 - Management Transfer** guidance, outlining the criteria for approving management transfers and scenarios illustrating when a management transfer may be considered.

11. Confirmation of award

- 11.1 Eligible applications are entered onto their respective housing lists for the appropriate size of property in accordance with their household composition and the applicant's choices. This is completed by the gatekeeper (for general needs and transfer applicants) or the Inverclyde CHR team.
- 11.2 Applicants specify preferences on their application such as choices about the area, house type, floor level, or other attribute of a property such as having central heating, type of bathing facilities or having a lift.
- 11.3 The gatekeeper or the Inverclyde CHR team should contact applicants to confirm basic information about the registered application. This could include:
- the Banding (for North Lanarkshire Sheltered housing applicants only) the application has been placed in;
 - the number of points the applicant has been awarded;
 - the registration date;
 - the registration number;
 - the locations chosen by the applicant;
 - apartment size; and
 - for Inverclyde CHR - the list the applicant is registered on (general needs or adapted) on and property feature required for example the stair level.

12. Sheltered and special needs housing

12.1 Special needs or supported accommodation is not allocated via the CHR, instead nominations are received from the local authority social work department. For any applicants wishing to access this type of housing, staff should signpost them to the relevant team in North Lanarkshire Council or Inverclyde CHR.

13. Employees, governing body members and relatives of persons connected with the association

13.1 Applicants are asked on their application form and at the pre-allocation visit if they are employed by Sanctuary, or related to any staff members or governing body members. If the applicant is an employee or agent, is a governing body member, or is related to an employee or governing body member, then the relevant Housing Manager must be informed. Any offer to these applicants must be approved in advance. The Area/Housing Manager must complete the ['Request for housing of employees, board members and their relatives'](#) form to ensure compliance with Governance procedures.

D. Allocating to an applicant

14. Preparing for allocations

14.1 It is important to let houses as quickly as possible to minimise the lost rent when the property is empty. When a termination notice is received for a property, or when a new development handover date is confirmed, staff should start to prepare for advertising the property on the Inverclyde CHR Choice Based Lettings portal or for the North Lanarkshire CHR, staff should start to review the waiting list.

14.2 For the Inverclyde system, internal staff will need to inform the Inverclyde CHR portal of the date, size and type of property so that applicants have the relevant details about the property in order to make a bid.

15. North Lanarkshire Housing register

15.1 Allocations Officers will start to decide who the property is most suitable for by deciding which group the property should be offered to, such as homeless, transfer, aspirational transfer or general group. Within these groups, the Allocations Officer will then assess applicants as per the guidance in section 16.6 below.

16. Inverclyde Housing Register

16.1 Available properties are advertised by the Inverclyde CHR and are to be allocated to the housing list or the transfer list as per any quotas prescribed in Local Lettings Strategies.

- 16.2 Property adverts have a closing date set for a fixed day each week and multiple properties can be advertised at any one time. Information about the property features, size and facilities should be sent to Inverclyde CHR to show on the advert in addition to the rent, service charges and energy efficiency rating.
- 16.3 Sanctuary has the ability to set the priority order for a letting. Priority may be given to certain groups or household types, and this will be clearly specified in the property advert. For example, it may be decided that the property should be allocated to a particular band of applicant if this will help to meet quotas set out in the Local Lettings Strategies. The Area or Housing Manager will provide guidance for any member of staff unsure about this decision.
- 16.4 Sanctuary also reserves the right to set the criteria for each property advertised. This could include restricting or widening the household size accepted for management reasons. Any restrictions on how a property will be let must also be specified. For example if pets are not allowed in the property or if families with children will not be considered. This criteria should be clearly stated in any advert.
- 16.5 Applicants may bid for a maximum of three properties covering all participating landlords during any week. This is done by the applicant online before the closing date or with assistance from the Inverclyde CHR team if requested. Applicants can view their bid position at any time after their bid is registered by logging into their application, or retract any bids they have made before the property closing date.
- 16.6 On the closing date of the advert, a list of applicants who have bid will be produced which must then be reviewed to identify the most suitable applicant.
- 16.7 Reviewing bids and the CHR shortlist
- 16.7.1 When reviewing the CHR waiting list or the list of applicants who have made a bid, staff should assess the applicants giving consideration to:
- the applicants needs compared against the size, attributes and location of the property;
 - if there are any priority criteria or restrictions, the list should be filtered accordingly (for example, to identify transfer applicants only); and
 - any priority criteria based on housing need and making best use of stock. For example, properties with specific features such as level access or adapted accommodation should (subject to demand) be let to someone who would benefit from the features present in the property. For further information see the [Lettings - Sanctuary Scotland Policy](#) and Points Based System guidance in [AG01](#).
- 16.7.2 Applicants identified as meeting any specified criteria and having the highest priority (highest number of points) will then be contacted to arrange a home visit and verify their circumstances. For those who respond to state interest, a pre-allocation visit should be arranged as per section 17 below to verify their circumstances.

17. Home visits

- 17.1 When staff have established which applicant is at the top of the list (via the register or bidding), a home visit should be arranged to complete the pre-allocation checklist. Ideally a home visit and pre-allocation checklist will have been carried out for at least three applicants, so that any refusal will not significantly impact on the relet time. At any point that applicants are contacted to establish if they are interested in the type of property available, there must be no mention of an offer until all checks have been made and the Area Manager or Housing Manager has approved an offer.
- 17.2 The purpose of a home visit is to verify the applicant's circumstances are as stated on their application form. The gatekeeper or Inverclyde CHR team may also carry out random visits to a proportion of those applicants on the housing list in order to check the authenticity of their applications.
- 17.3 Where a home visit has been attempted a contact card will be left. The applicant has 24 hours in which to respond to Sanctuary. Failure to respond will be classed as a refusal and may result in the application being suspended.
- 17.4 In the case of transfer applicants, the house visit will allow staff to check that the property has been maintained in accordance with the tenancy agreement and to discuss end of tenancy procedures as well as to verify the applicant's circumstances.
- 17.5 The pre-allocation checklist should be completed at the home visit. Specifically, the following should be considered at the home visit:
- Is the applicant in the correct category and has the correct points awarded?
 - Does the accommodation match their choices and needs?
 - Are the details on the application form correct, for example current sleeping arrangements, medical needs, and so on?
 - Is the applicant's current home and garden in a satisfactory condition?
 - Does the applicant have any support needs such as benefiting from a referral for support or money advice?
- 17.6 At the home visit staff should ask the applicant to sign a declaration confirming that the information on their form is complete and accurate and giving consent to make enquiries to confirm this information. Where an applicant does not live within reasonable travelling distance of one of the Association's offices, a local Registered Social Landlord may be requested to make a visit on our behalf.
- 17.7 The implications of moving on an applicant's eligibility for housing benefit or universal credit should be discussed with the applicant.

17.8 Where an applicant requires a ground floor property, a medical professional may have advised that a property with any stairs at all is not suitable. However, if there is no such restriction in place, we might be able to alleviate an applicant's situation by moving to a property e.g. with one stair up to the front door. If this is the case, we should consider whether any further adaptations to the property may be required. It is important to bear in mind that an occupational therapist may not provide approval for adaptations such as a level access shower if there are stairs in the property. We also need to consider any potential impact on our own adaptations budget. If there are any doubts over suitability, then the Area or Housing Manager should be consulted.

18. Selecting an applicant

18.1 After completing the home visit, the designated officer should discuss the details of the application and the outcome of the visit with the Area Manager or Housing Manager to determine if an offer can be made. The shortlist on which the applicant has been selected must be signed off by the officer making the selection and counter signed by the Housing or Area Manager.

18.2 If there are multiple eligible applicants with the same number of points who are considered suitable for the property, priority may be determined by the length of time the applicant has been registered on the list.

18.3 Bypassing applicants

18.3.1 When making allocations decisions staff may choose to bypass an applicant who is at the top of the list with the highest number of points if staff think that another applicant is better suited to the property, but we must make sure that applicants with the greatest need overall are properly considered for the property. For example, applicants with medical needs may be better suited to ground floor or adapted properties. Any applicants bypassed on a shortlist should have a record of the reason for bypassing added to the relevant CHR system.

18.3.2 There is an allowance in our policy to make a management transfer, where an existing tenant will be transferred due to exceptional circumstances, even though they do not have high enough priority to be considered for the house. Such transfers should be kept to a minimum, and caution should be exercised to ensure that we do not use management transfers simply to appease applicant who are dissatisfied with the level of priority they have been awarded - we should tell such applicants about the appeals and complaints procedure. All use of management transfers must be approved, and bypass reasons recorded on SAP. Housing Officer must complete the Management Transfer Approval form (**Appendix 2**) and submit it to the Area or Housing Manager for review. The Area or Housing Manager will consider the full implications of the transfer ensuring that the applicant's needs are taken into account and obtain approval from the Head of Housing. While supporting evidence from agencies will be considered as part of the management transfer application process, the final decision on whether to approve the management transfer rests with the Head of

Housing. Guidance on management transfers is available on in **AG03 - Management Transfer** guidance, outlining the criteria for approving management transfers and scenarios illustrating when a management transfer may be considered.

E. Making an offer

19. Producing and recording offers

- 19.1 To produce and record an offer for Inverclyde CHR applicants, the applicant must have an application created in SAP using the details provided on the CHR application form. Once completed, the property to be let must be identified and a 'direct match' made to the applicant and an offer created on SAP.
- 19.2 To record an offer for North Lanarkshire CHR applicants, this must be done on the North Lanarkshire CHR system.
- 19.3 Staff should then contact the applicant to verbally make a formal offer and establish if they are interested in viewing the property. If the applicant is interested, staff should create an offer on SAP and print and send the offer letter to confirm the offer in writing. Staff should explain to the applicant that offers are provisional as termination notices can be retracted or vacant properties may need to be used for emergency decants. The offer letter will also include details of rent payments; it is expected that rent payment will be made in advance in accordance with the tenancy conditions at the time the tenancy commences. The minimum payment which will be accepted will be made clear in the offer of let. If the successful applicant cannot be contacted to make a verbal offer, the offer letter should still be sent.
- 19.4 If the applicant states that they are not interested in the property after receiving a formal offer, this should be recorded as a refusal on the relevant system where the offer has been created. Staff can then begin the process to offer the property to the next applicant on the list. Where possible, staff should get written confirmation of a refused offer unless attempts have been made to contact the applicant and there has been no response.
- 19.5 Applicants have up to three working days from the date of the offer letter being sent to refuse the offer or to arrange for a viewing. Refusals can be accepted in writing or verbally. If there is no response to the offer letter and the applicant cannot be contacted, then this should be recorded as a refusal. Where this is done, staff should confirm this in writing to the tenant to note that the property has been refused.
- 19.6 Viewing of the property will be by way of an accompanied visit in the presence of a member of staff. Where possible, viewing will be carried out before the outgoing tenant vacates the property. Viewings should be arranged for as early as possible. Applicants should be given a copy of the re-let standard and this should be discussed during the viewing.

- 19.7 If possible, the designated officer should encourage the applicant to confirm their decision to accept or reject the offer or express interest in the property at the viewing. If this is not possible, applicants should be given up to one working day after viewing a property to decide if they would like to accept it. This may be extended by a further working day in special circumstances, although this should be discussed with the Area or Housing Manager or person of equivalent seniority if practical. For Inverclyde CHR applicants, the applicant must accept the offer in writing. For North Lanarkshire CHR, applicants can accept the offer verbally or in writing.
- 19.8 At the pre-offer stage, viewings may also be arranged where demand for a property is likely to be low. After inviting expressions of interest, multiple applicants may be invited to view the property (in order of CHR list priority). This is in order to speed up the time it will take to get someone to accept the property. Individual appointment times should be staggered, with each applicant being given an agreed time to view.
- 19.9 Where an applicant accepts an offer and is in a social tenancy or is renting privately, they should be advised to hand in their notice. This will enable them to move in to the property they are to be offered as soon as possible. If they do not hand in their notice this may delay their timescale for moving in to their new tenancy, particularly for applicants in receipt of housing benefit/universal credit which may not be paid for two properties (unless they are waiting on aids/adaptations to be completed in the new property). This will increase the void period and impact on rent loss.
- 19.10 The outcome of an offer may be that the applicant accepts, accepts then changes their mind, or refuses. Staff may also decide to withdraw an offer where, for example, it becomes apparent that any of the suspension or application cancellation reasons apply. All of these scenarios must be recorded on SAP/ the North Lanarkshire CHR system.

20. Refusals

- 20.1 If an applicant refuses two offers, then staff should offer them an opportunity to review the choices on their application via a housing options interview. If an applicant refuses multiple reasonable offers of housing then the applicant may be suspended as per section 6 of the [Lettings - Sanctuary Scotland Policy](#) and Part 1, suspension reasons of **AG01**.

21. Welfare benefits and referrals for advice

- 21.1 If the applicant has no income from employment or a low income, we should assist the applicant in completing a housing benefit application at the earliest possible stage. All new tenants should be offered an appointment with the relevant Welfare Rights Officer. The Welfare Rights Officer will be able to sign post the new tenant to relevant local services, such as furniture providers. For further information on pre-tenancy income and expenditure advice, refer to the [Income Management - Sanctuary Scotland Procedure](#).

22. Sign up

- 22.1 When the applicant has accepted an offer, Housing Officers must complete the New Tenancy Checklist (**Appendix 1**) and hand this over to Assistant Housing Officers before creating the contract. Assistant Housing Officers should then complete their actions on the New Tenancy Checklist before preparing for a sign up: creating the contract, printing the tenancy agreement and collating the relevant paperwork.
- 22.2 Staff should aim to complete a sign up within one working day of viewing the property and the offer being accepted. This timescale may be extended by a further working day in special circumstances. If the applicant fails to sign the tenancy agreement, the offer will be withdrawn and recorded as a refusal.

F. Application Management

23. Annual review of applications

- 23.1 Applications should be reviewed in accordance with any timescales set out in the [Lettings - Sanctuary Scotland Policy](#) and **AG01**. Inverclyde applicants will be reviewed by the external CHR team, and the gatekeeper is responsible for reviewing and North Lanarkshire applications. The gatekeeper/Inverclyde CHR team are responsible for managing changes in circumstances, who have access to the applications to reassess, remove, suspend or update the applications. Normally any changes in circumstance or requests to be removed from housing waiting lists will be accepted in writing and where relevant evidence to verify changes will be requested.
- 23.2 Where an applicant has been removed or their circumstances have changed and this has affected their position on the waiting list, the gatekeeper or Inverclyde CHR team will normally write to the applicant to inform them of this.
- 23.3 Removed applicants contacting us after one month should normally reapply by completing a new application form. This will be regarded as the new date of application, unless the Housing Manager considers there to be mitigating circumstances.
- 23.4 It is also the applicants' responsibility to amend their own online application for the Inverclyde CHR. Inverclyde CHR applicants who choose not to bid within a reasonable time period will also be contacted for a review of their application. This may lead to them acknowledging that they do not wish to pursue their application as they do not wish to be housed in any of the properties becoming available. The review may identify that an applicant may need help with the bidding process or may benefit from approaching rehousing through the referrals route as an alternative so that their support needs can be fully assessed.

24. Change of circumstances

- 24.1 Applicants should inform the gatekeeper or the Inverclyde CHR team when they have a change of circumstances to prompt a re-assessment of housing needs. Examples of changes of circumstances include:

- change of address;
- people joining or leaving the household;
- change of choice of location(s);
- pregnancy/birth of a child;
- relationship breakdown;
- change to the medical circumstances of anyone included in the application;
- death of a household member;
- death of a joint applicant;
- the applicant has been imprisoned; or
- any other material circumstances that change their housing application.

24.2 Sanctuary's approach to change of circumstances and the effect on their points/award is set out in [Section 14 of the Lettings - Sanctuary Scotland Policy](#). When an applicant changes address, this may affect overcrowding or under-occupation and the number of points awarded. This should prompt a review of the application to ensure the correct number of points have been awarded based on their new circumstances.

24.3 If an applicant appears to be unfairly disadvantaged by having points taken away due to their new circumstances, this should be discussed with the Area Manager or Housing Manager and the applicant should be provided with an explanation of the decision.

25. Cancellations

25.1 Circumstances for cancelling an application are set out in the [Lettings - Sanctuary Scotland Policy](#) and any additional information is included in the [AG01](#). These are:

- the applicant asks us to cancel their application;
- the death of an applicant; or
- the applicant repeatedly fails to respond to a review of the list or to other correspondence, for example in relation to missing information.

25.2 Cancelled applications are actioned and managed by the gatekeeper or the Inverclyde CHR team. If an applicant wishes to appeal the decision to cancel their application, staff should signpost the applicant to the relevant external CHR team unless Sanctuary are the gatekeeper so will be responsible for both the cancellation and the appeal.

26. Suspensions

26.1 Reasons for suspending an applicant are set out in [Section 6 of the Lettings - Sanctuary Scotland Policy](#) and this will be managed by the gatekeeper or the Inverclyde CHR team. Where an applicant is suspended at the point of an offer or contract being created, this must be recorded on SAP, or the North Lanarkshire CHR system, and inform the applicant of the reasons for suspension, explain that they will not be offered any properties while they are suspended, and tell them what steps they need to take for the suspension to be removed.

- 26.2 For applicants with rent arrears and/or other debts, our policy sets out that for a suspension to be cleared an applicant must reduce to debt to a level below one twelfth of the annual amount payable, or must have an appropriate arrangement to pay outstanding debts which has been maintained for the previous 3 months. It is important that any repayment agreement is realistic. Important factors to consider are the applicant's willingness to address the debt and affordability of the agreement to the applicant.
- 26.3 Tenants with under occupancy charge arrears only should not be suspended from receiving an offer of housing.
- 26.4 For applicants affected by the under-occupancy charge and with pre-existing arrears, we will suspend applicants if they have not kept to an appropriate arrangement for at least three months. A tenant may be affected by the under-occupancy charge, making payments over and above the housing benefit that is received, but their arrears remain static or are increasing. This may an applicant for whom we are receiving Third Party Deductions (Arrears Direct). In this circumstance it is reasonable for us to say that what they are paying is an appropriate arrangement, and if they stick to this for 3 months then there is no reason to suspend their application. If rehoused, we would expect the tenant to sign the mandate saying that they will pay off the arrears. The final decision on any transfer will normally be made by the Area Manager or Housing Manager.
- 26.5 For applicants who have intentionally worsened their circumstances, the decision to suspend is at the discretion of the Area Manager or staff member of at least equivalent seniority.
- 26.6 As far as possible we should try to make personal contact with applicants who are suspended and encourage them to take steps to address their suspension. Applicants with rent arrears should be offered a referral to our welfare benefits service where appropriate, and signposted to the local Citizens Advice Scotland or local authority where there are wider debt issues.
- 26.7 Suspending for anti-social behaviour should be used with caution. The effects on the household of suspending for anti-social behaviour should be considered, as well as the fact that suspension is unlikely address any underlying difficulties. Use of a short Scottish Secure Tenancy may well be a more appropriate option. Further guidance is available in the CIH publication Suspending Housing Applicants: A Practical Guide.
- 26.8 Sanctuary cannot suspend people who we owe a duty of rehousing to under the [Housing \(Scotland\) Act 2001](#). This means that if we get a section 5 referral for an applicant who is suspended then we must still rehouse that applicant.
- 26.9 Where Sanctuary are the gatekeeper for North Lanarkshire CHR applications, staff must ensure that suspended applications are reviewed regularly, particularly those with a time limit of six months (voluntary suspensions and refused offers) and up to three years for all other scenarios. This is managed by the Area Manager or person of at least equivalent seniority on the CHR system.

- 26.10 Applicants with suspensions should have a 'review date' set to the date of the suspension expiring. A report will be run based on the 'review dates' due and applicants will then be contact to confirm if there have been any changes of circumstance. This allows for the application to be updated at the same time if necessary.
- 26.11 If the suspension can be removed because the time limit has expired and no further suspension reasons apply, the status of the application will be set to 'live'.
- 26.12 If further grounds for suspension have occurred that are specifically related to conduct, the application will remain suspended from the time the act was committed and will be a three year rolling basis.
- 26.13 If an applicant wishes to appeal the decision to suspend their application, staff should signpost the applicant to the relevant external CHR team unless Sanctuary are the gatekeeper so will be responsible for this review which should be referred to the Area Manager or Housing Manager or person of at least equivalent seniority.

Supporting Information

- [Aids and Adaptations - Scotland Policy and Procedure](#)
- [Content and Records Management - Group Policy and Procedure, Appendix 1 - Retention Schedule](#)
- [Privacy Statement Register](#)
- [Data Protection - Group Policy and Procedure](#)
- [Lettings - Sanctuary Scotland Policy](#)
- [Mutual Exchange - Scotland Policy and Procedure](#)