

## Horton Housing Group

### SELECTION AND ALLOCATION POLICY

#### 1.0. Introduction

1.1. The purpose of this policy is to ensure that Horton Housing Group (comprising Horton Housing Association and its subsidiaries) selects its clients and allocates its housing, care, support and other services in a fair, equal and consistent manner to those whose needs are greatest and consistent with the aims and objectives of any particular scheme.

- Horton Housing Association (HHA) will retain final control over the selection and allocation of services.<sup>1</sup>
- Each scheme will have a clear policy for selecting clients and allocating services to them.
- Fair access will be given to all sections of the community and assessment procedures will ensure that services are offered to those in greatest need and most vulnerable.
- The policy for selection and allocation will be in writing, publicised and widely circulated to avoid any indirect discriminatory practice.
- The allocation of services will be monitored and reviewed to ensure that services are responsive to changing needs and priorities.

#### 2.0. Legal and Good Practice Requirements

2.1. The Equality Act 2010 replaced the previous anti-discrimination laws with a single act, simplifying the law and making it easier for people to comply with.

2.2. The Act affords protection from discrimination on the grounds of nine protected characteristics:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

2.3. Horton Housing Group aims to provide equal, fair access and provision of services to all applicants and clients. We aim to eradicate discrimination and unfairness on any grounds, including the above.

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<sup>1</sup> Unless, exceptionally, contract terms dictate otherwise.

- 2.4. The Homes and Communities Agency *'Regulatory Framework for Social Housing in England from April 2012* (HCA March 2012) states that 'Providers should demonstrate that they understand the particular needs of their tenants' (Chapter 2 Part V) and makes reference to the equality strands of The Equality Act (2010).
- 2.5. Regulated services will take this Framework into consideration within their selection and allocation policies and procedures.

### 3.0. Definitions

3.1. Where discrimination against any person or group is referred to it shall be deemed to be potential unfair discrimination and/or illegal. Seven types of discrimination are covered by statute:

- **Direct discrimination:** discrimination because of a protected characteristic.
- **Associative discrimination:** direct discrimination against someone because they are associated with another person with a protected characteristic. (This includes carers of disabled people and elderly relatives, who can claim they were treated unfairly because of duties that had to be carried out at home relating to their care work. It also covers discrimination against someone because, for example, their partner is from another country).
- **Indirect discrimination:** when you have a rule or policy that applies to everyone but disadvantages a person with a protected characteristic.
- **Harassment:** behaviour deemed offensive by the recipient. A person can claim they find something offensive even when it is not directed at them.
- **Harassment by a third party:** employers are potentially liable for the harassment of staff or customers by people they do not directly employ, such as a contractor.
- **Victimisation:** discrimination against someone because they made or supported a complaint under Equality Act legislation.
- **Discrimination by perception:** direct discrimination against someone because others think they have a protected characteristic (even if they do not).

### 4.0. The Use of Targets

4.1. HHA's Equality and Diversity Policy addresses this. In certain circumstances the need for specific targets, aimed at providing services to particular groups, based on the level of identified need, may be adopted by the organisation.

### 5.0. Principles

5.1. HHA recognises that fair and equal allocation of services depends upon:

- assessment of need across all sections of the community
- all staff being aware of anti-discriminatory practice
- adequate monitoring and review of referral and allocation procedures
- ensuring that the choice of referral agencies is not in itself discriminatory
- ensuring that publicity materials are distributed to organisations representing minorities and under-represented groups
- clients being consulted and having input into leaflets and other publicity materials
- publicising the organisation's equal opportunities statement and all relevant selection criteria in appropriate languages and formats
- ensuring that selection criteria do not indirectly discriminate by placing unnecessary conditions on prospective referrals
- making sure that practice is monitored and reviewed on a regular basis to identify and combat any discriminatory trends.

#### 6.0. Information for Referral Agencies

6.1. In order that referral agencies, prospective clients and other relevant parties are informed about specific schemes, each project will produce a Service Description detailing the:

- scheme's aim and objectives
- scheme's commitment to equality and diversity
- services provided
- selection criteria
- basis for assessing priority need
- timescale for decisions
- requirement to provide any supplementary information

6.2. The Service Descriptions are available in large print and various different languages on request.

6.3. British Sign Language interpreters are available for assessments and interpreting information for deaf applicants.

#### 7.0. Selection Criteria

7.1. Selection criteria for schemes will address the following issues:

7.2. *Aims and objectives*

- who the scheme is for
- care, support, intensive housing management or other services provided

- type of accommodation, floating support or other support type
- equality and diversity statement

### 7.3. *Who is eligible?*

- any specific requirements (e.g. age, gender, dependency or health problems or care needs)
- type or level of support needed
- current status (e.g. homeless, single, under CPA)

### 7.4. *Who is excluded?*

- reasons for not offering the service (there should be no blanket policy - an assessment of risk should be made for each individual)
- there is a regular review of those evicted or excluded from the service

### 7.5. *How to refer*

- how to apply
- who to contact
- what assessment and/or interview needs to be carried out
- whether self-referrals are accepted (generally they are accepted)
- details of referral agencies

### 7.6. *The allocation process*

- how this will be conducted
- application forms
- interview arrangements
- involvement of other agencies

### 7.7. *Communication*

- how contact will be made at each stage
- how decisions will be communicated

## 8.0. The Referral / Application Form

### 8.1. The Referral / Application Form will:

- allow for monitoring of the organisation's performance against all protected characteristics
- assess the level of need of the applicant
- examine a person's medical history and/or risk history only in so far as is relevant to the scheme

- cover areas which have been highlighted for refusal of services
- indicate how the information will be used and who will have access to it

#### 9.0. Interviewing/Assessing Referrals

- 9.1. Where possible all referrals should be interviewed by at least two members of staff.<sup>2</sup> Interviews should follow a standard format and assess the person against objective criteria. (See Eligibility Criteria and Needs and Risk Assessment/Interview Form).
- 9.2. Wherever possible applicants should be sent reminders of assessments/interviews by text or phone the day before the appointment. This will also serve as a check that the applicant still wants the service.
- 9.3. Applicants with reading or language difficulties, known to support staff, will be contacted by telephone prior to any assessment to ensure that they have understood their letter and/or letters will be translated.
- 9.4. Staff should seek to put applicants at ease and offer reassurance about the process and what will happen afterwards.
- 9.5. The interview should give the applicant additional information about the scheme and allow them to judge whether it suits their needs or not. If at all possible, prospective clients should be given the chance to view accommodation-based schemes or venue-based services.
- 9.6. In accommodation schemes, if for any reason an applicant cannot attend the scheme for assessment/interview, arrangements should be made to meet them at an alternative venue such as their current accommodation, referrer's office, hospital or prison.
- 9.7. The applicant should always be told how and when they will be notified of the decision.
- 9.8. Care and support staff/housing officers should always ensure that applicants are aware that they have been referred and discuss this with the referrer and applicant where appropriate.

#### 10.0. Appeals

- 10.1. Any person who is refused services must be informed of their right of appeal.
- 10.2. Appeals will be heard in accordance with the Client Appeals Procedure.

#### 11.0. Prioritising

- 11.1. Those referrals in greatest need of the service will receive priority (this is usually defined in terms of vulnerability or risk for care and support services

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<sup>2</sup> One can be from another agency, where joint-working is taking place.

but some schemes are also designed to support balanced and sustainable communities for those with a more advanced level of tenancy-readiness, so this may also be taken into account).

- 11.2. Where appropriate, a waiting list, indicating the level of need for the service, will be maintained by individual schemes.
- 11.3. Staff will maintain contact with applicants on a waiting list (at least two monthly or other frequency by prior arrangement with the applicant) in order to ensure that the service is still needed and also to reassure the applicant of their position on the list. This contact can be by phone, letter or text where appropriate.
- 11.4. All schemes are encouraged to hold regular drop-in sessions where applicants can be updated on their position on the waiting list.
- 11.5. Where the above is not possible, schemes should attend stakeholders, referrers and other agencies or have a presence in their offices and drop-ins in order to update applicants on their position on the waiting list.

## 12.0. Commencing Service

12.1. Once an offer has been made and accepted then staff should:-

- Explain support/care planning and/or housing management process
- Issue and explain the:
  - Support Agreement (where applicable); and
  - Client Handbook / Welcome Pack
- Additionally, in accommodation-based services, staff should:
  - explain the terms and conditions of the occupancy agreement
  - identify welfare benefit entitlement and gain necessary information from the client
  - explain house rules
  - explain the move-on/resettlement planning process
  - provide information on local services/amenities

12.2. If clients transfer between schemes, there will be a formal handover procedure, including clients' files, and clients will be fully consulted and involved at every stage, as set out in the 'Move On and Resettlement Strategy' (Section 9 – Internal Transfers).

## 13.0. Monitoring

13.1. Monitoring and review of the selection and allocation process will be implemented to identify potential areas of discrimination, assess changing patterns of need and inform future strategies.

- 13.2. For supported housing schemes, owned by Registered Providers, Supported CORE lettings information will be completed for each new letting.
- 13.3. Annual reports will be made to the Group's Boards of Management detailing equalities data on successful and unsuccessful applications to and exits from services.
- 13.4. Annual targets will be set to address gaps or weaknesses. Performance will be monitored against these.