



*Glen Oaks Service Improvement Group
Allocation Scrutiny Report*

16th April 2019



*The Service Improvement Group would like to thank
all Glen Oaks staff and Tenants Information Service,
who assisted and supported us to carry out this
scrutiny project.*

Contents

		<i>Page</i>
1.	<i>Introduction</i>	3
2.	<i>Our Scrutiny Activities</i>	3
3.	<i>Our Findings</i>	4
4.	<i>Our Key Recommendations</i>	7
5.	<i>Our Feedback and Recommendations</i>	9
6.	<i>Next Steps</i>	20
	<i>Appendix 1: Allocation Policy</i>	21
	<i>Appendix 2: Allocation Policy Guide</i>	24
	<i>Appendix 3: Extract from GOHA Complaints Handling Guide</i>	29

1. Introduction

Glen Oaks Housing Association (GOHA) Service Improvement Group (SIG) is pleased to provide the following report on our scrutiny of GOHA's housing allocation policy and procedure.

2. Our scrutiny activities

During this scrutiny project we carried out the following scrutiny activities:

1. Review of Scottish Social Housing Charter outcomes relating to housing allocations including:

- A. Outcomes 7,8 and 9 Access to Housing and Support which state:

Social landlords work together to ensure that:

- People looking for housing get information that helps them make informed choices and decisions about the range of housing options available to them
- Tenants and people on housing lists can review their housing options.

Social landlords ensure that:

- People at risk of losing their homes get advice on preventing homelessness.

- B. Outcome 10 which states

Social landlords ensure that:

- People looking for housing find it easy to apply for the widest choice of social housing available and get the information they need on how the landlord allocates homes and on their prospects of being housed.

2. Presentation from TIS and group discussion on related housing legislation
3. Review of GOHA housing allocation policy, policy guide, application form, housing options form and personal action plan form.
4. Review of GOHA contextual and performance information, including understanding housing lists used by GOHA, how points are allocated, properties allocated across GOHA neighbourhoods
5. Meetings with Housing Allocation Officer and Manager.

6. Participation in Mock Interview.
7. Review of application forms of other landlords.
8. Review of GOHA and other landlord websites.
9. Consideration of complaints and compliments information.
10. Consideration of Letting Plan Information.
11. Consideration of Housing Need and Demand Analysis.
12. Mystery shopping – requests for application forms.

3. Our Findings

1. GOHA has 2 housing officers responsible for allocations.
2. GOHA has 1 allocations assistant responsible for uploading application forms to computer system. We understand that if the allocations assistant is on leave, application forms may not be uploaded on to the system during this period.
3. Timescale from application to allocation of property can vary as this depends on applicant needs and aspirations as well as availability of stock.
4. The GOHA target for loading applicant information on the computer system is 10 working days.
5. GOHA does not have a target for awarding points and sending letter to applicants to advise of this. NOTE: We understand this can depend on individual applicant circumstances.
6. The GOHA allocation process includes:
 - a. Application received
 - b. Information uploaded to GOHA system
 - c. Points awarded
 - d. Interview
 - e. Application goes live on system
 - f. Offers made, depending on availability of stock
7. There does not seem to be a “notified” target timescale for interviewing applicants. However we understand from the Customer Service Standards, this is 10 working days after application form details are uploaded onto GOHA

computer system. Meaning a period of around 4 weeks (20 working days) from receiving application form to advising applicants of points and potentially inviting to interview.

8. Points are allocated as per specific categories of need.

NOTE: We understand this will change due to introduction of terms associated with the Housing (Scotland) Act 2014

9. Points are awarded by Housing Officer when form uploaded onto the computer system and applicant advised of points by letter.

10. Medical points are awarded based on description of conditions provided by applicants and how this affects their housing need and circumstances.

NOTE: We understand GOHA will not write to GP's or consultants for medical information, but will consider all information received, including letters from medical practitioners provided by applicants.

11. Points awarded by Housing Officer are also assessed by the manager.

12. GOHA can award emergency points and this is usually for people with a terminal illness.

13. Applicants receive 2 offers and if all refused GOHA will interview applicants again to update and check forms, needs, aspirations, reasons for refusal etc.

14. Refusal of offers were recorded as:

	Number of Offer Made	Number of Offers Refused	% Offers Refused
2015 / 16	210	123	58.6%
2016 / 17	322	240	74.5%
2017 / 18	266	104	39.1%

15. Re-let timescales in recent years are:

- 2015 / 16 – 20 days
- 2016 / 17 – 17.1 days
- 2017 / 18 – 21.5 days

16. Void rent loss in recent years has been:

- 2015 / 16 – 0.4%
- 2016 / 17 – 0.5%
- 2017 / 18 – 0.6%

17. Housing officers do not visit properties offered as it is understood that all properties should meet the lettable standard.

18. At tenancy sign up, applicants are required to pay 4 weeks rent in advance.
19. GOHA can suspend offers for up to 3 months to allow applicants to save the 4 weeks advance rent payment.
20. With transfer applicants, GOHA offers new property and then checks rent account to see if there are any issues or concerns.
21. GOHA carries out an annual review of applications with applicants.
22. Applicants' who are homeless, are advised to use the services of Toomax, in terms of Section 5 Referrals.
23. Homeless applicants receive only 1 offer of housing.
24. The housing options form is relatively straight forward and easy to complete for people with literacy skills and English as a first language. However we consider some improvements could be made. Details of our recommended changes can be found in section 4.
25. GOHA does not have forms in other languages

We understand that:

- Previously GOHA did have forms in other languages, however was difficult for GOHA staff to translate if form completed in another language.
- GOHA are members of "Happy to Translate", however the service is not used often.

26. At present applicants are unable to apply for GOHA housing on – line.
27. GOHA uses the Glasgow Housing Options approach for housing applications.
28. GOHA targets for housing homeless applicants are not being met.
29. The GOHA website has a section on how to apply for housing.

NOTE we understand this will be updated in the near future.

30. The housing options interview is thorough. A checklist is used to assess application form and housing need.
31. There are no complaints or compliments recorded with regard to the allocation process.

4. Our Key Recommendations

Our recommendations outlined below are not in a particular order of priority, but are linked to our scrutiny tasks.

More extensive details are provided in Section 5.

1	GOHA improves target timescales for uploading applicant information onto computer system, awards letters to tenants and applicant interviews.
2	GOHA ensures responsibility for uploading application forms is delegated to another officer when the allocations assistant is on leave.
3	GOHA revises the allocation policy to meet the Housing (Scotland) Act 2014 Guidance and take account of our recommendations in Appendix 1.
4	GOHA revises the application form as per Section 5, point 3 and agrees the new format with the SIG.
5	GOHA develops an on line version of the application form that can be completed and submitted on line.
6	GOHA reviews usage and effectiveness of Housing Options.
7	GOHA revises “Your Guide to our Allocations Policy” as per Appendix 2.
8	GOHA records all feedback regarding the allocation policy, process and procedures and where this is considered a service failure or dissatisfaction, that this is recorded as a complaint.
9	GOHA continues to explore innovate allocation methods such as “shared housing, children sharing larger bedrooms”

10	GOHA considers alternative opportunities for housing homeless people directly as well as Section 5 referrals.
11	GOHA develops its own bespoke Housing Need and Demand Template.
12	GOHA works to improve re-let timescales and reduce void rent loss.
13	GOHA ensures properties meet the Lettable Standard prior to viewings.
14	GOHA continues the good work in improving re-let standards, which we are pleased to see had reduced from 74.5% refusals in 2016 / 17 to 39.1% in 2017 / 18 NOTE – SIG will add 2018 / 19 figures if available and revise if required.
15	GOHA considers increasing the offers to homeless applicants to 2. This would ensure all applicants are being treated equally and fairly.
16	Where more than one property is available to suit person at top of lists needs, GOHA considers allowing applicant, including homeless applicants to view up to 3 properties available and suitable to their needs at the same time and allow the applicant to choose their preferred property.

5. Our Feedback and Recommendations

1.	GOHA overall aim
	Our comments
	<p>We understand that as a landlord organisation GOHA's overall aim is to provide good quality affordable housing and effective management and maintenance services.</p> <p>We consider the current timescales for uploading applicant information, awarding points, sending out points' award letter and inviting applicant to interview at around 4 weeks is too long. (See Section 3 point 5 above).</p>
	Our Recommendations
	<p>GOHA improves target timescales in relation to:</p> <ul style="list-style-type: none"> • Uploading information to computer system to "on the day forms are received or next working day". • Where housing assistant is on leave, GOHA delegates responsibility for uploading application forms to another officer. • Inviting applicant to interview within 10 working days • Sending letter to applicant the following day or next working day after interview , o advise of points • Where applicants hand deliver application forms to GOHA offices, Staff should set appointment with the applicant at that time and then confirm by letter. <p>NOTE: We consider this would benefit applicants and GOHA in terms of:</p> <ul style="list-style-type: none"> • Improved void turnaround times • Improved void rent loss figures • Applicant quicker understanding of points awarded and potential for re-housing or other housing options routes to consider • Improved waiting timescales for applicants • Quicker rehousing of homeless applicants (who currently are not getting the best of service from Glasgow City Council
2.	The Policy
	Our comments
	<p>We understand the policy is set to operate within the parameters of housing and homelessness legislation.</p>
	Our Recommendations
	<p>GOHA continues with work to revise the policy to meet needs of the Housing (Scotland) Act 2014 and the Scottish Social Housing Charter (SSHC).</p>

	Details of what we consider should be included in the new GOHA allocation policy are outlined in Appendix 1 .
3.	The application form
	Our comments
	We consider the form is relatively straight forward to complete for people with good literacy skills and English as a first language.
	Completing the form can take some time.
	Some abbreviations such as LA, RSL, PRS, DWP are used.
	On Page 2 – household composition and Page 3 – people moving with you seems like a duplication.
	Although we understand some information is requested in terms of equal opportunities, we consider applicant religion is not information GOHA should require.
	The disability self – assessment section is good.
	We consider it is positive that applicants are asked to identify if they are an asylum seeker or refugee.
	The form indicates that applicants are required to provide identification and although we understand the reason for this, we consider that GOHA should be aware of their own tenants / transfer applicants.
	Applicant financial information is requested in the application forms, however we are unsure as to why this is needed at this stage as properties are allocated based on need, not financial circumstances.
	We consider the medical assessment and request for GP details is positive.
	We understand that some sort of “assessment” is required when considering whether or not to award medical points and understand that GOHA staff are not medical professionals therefore this may prove challenging in some cases. However we consider that GOHA needs to ensure that medical points are allocated in a fair and consistent manner and reflective of how medical conditions affect housing circumstances and need.
	We consider it is good practice that GOHA strives to allocate adapted properties to applicants who need the adaptation.
	We consider the form does not flow very well, with finance information and equal opportunities sections in the middle of the form.

	In the choice of areas, there is an option for Arden New Build. We consider that as GOHA now has various new build developments that is now unclear
	Our Recommendations
	The form is reviewed and updated to make it easier to complete. Including:
	<ul style="list-style-type: none"> • Details of main and joint applicant side by side on form.
	<ul style="list-style-type: none"> • Full details of what abbreviations mean.
	<ul style="list-style-type: none"> • Explanation of type of tenancy i.e. tied tenancy.
	<ul style="list-style-type: none"> • Details requested on pages 2 and 3 – “household composition and people moving with you” are merged into one section with a box to tick for people moving with you to avoid duplication.
	<ul style="list-style-type: none"> • Details of religion should not be asked.
	<ul style="list-style-type: none"> • The disability self – assessment section box should be increased in size.
	<ul style="list-style-type: none"> • Asylum seeker / refugee Home Office reference number should be included in form.
	<ul style="list-style-type: none"> • Need for identification is removed for transfer applicants.
	<ul style="list-style-type: none"> • Applicant finance section is removed from the form and addressed separately at the allocations appointment / interview.
	<ul style="list-style-type: none"> • As well as asking for GP details, a box should be added requesting permission for GOHA to contact GP.
	<ul style="list-style-type: none"> • GOHA includes information and proof boxes noted with an i and p to assist people to complete the form and understand what is required and that proof will need to be provided. (See the South Lanarkshire Council form for more detail).
	<ul style="list-style-type: none"> • GOHA includes a box for applicants to tick if they have suffered from abuse. NOTE we consider this “may be the key to unlock people’s ability to get help”. NOTE we understand that GOHA will be required to check / ask for proof of abuse if it is being taken into account in the allocation of housing.
	<ul style="list-style-type: none"> • The layout of the form is revised to allow an easier flow, thus making it easier for applicants to complete. This would include moving the equal opportunities section to the rear of the form and as above, removal of finance section.

	An online version of the new form is developed and added to GOHA website, with applicants being able to complete parts of the form, save and come back to later. NOTE We consider this will assist people with limited IT skills, access to computers in libraries or other public places that are time limited or where people have to find out information not at hand.
	GOHA provides information on line and via other methods, such as newsletter, posters in office on how many houses GOHA has and number of allocations made in previous 2 – 3 years.
	GOHA considers additional questions relating to: <ul style="list-style-type: none"> immigration status if applicants are homeless and for details of homeless case worker if applicant is related to others in community name and address of current & previous landlord if applicant interested in an exchange / shared ownership / shared equity
	GOHA updates the application form to identify the streets where new build houses are located. i.e. New Build - Lunestone Court, Arden, New Build - Kilmuir Crescent.
4	Housing Options
	Our comments
	We understand the positives attributes of this approach, such as access to other services for information regarding applicants such as support services, but have some concerns in terms of some aspects its operation as follows: <ul style="list-style-type: none"> It does not form part of a Common Housing Register, therefore applicants are required to complete forms for all landlords they are interested in, which can be time consuming and frustrating. It does not seem to be clear as to how many GOHA properties are allocated via the Housing Options approach versus people applying direct to GOHA Although applicants complete a personal action plan at whichever landlord they first approach, when people meet GOHA officers, staff are required to revise them as the quality is inconsistent. NOTE we consider this duplication is not helpful to GOHA staff or the applicant.
	We understand as around 50 landlords now use Housing Options, that access to information from other services may not be as easily accessed as GOHA would like.
	Our Recommendations

	<p>GOHA reviews the Housing Options Approach to identify:</p> <ul style="list-style-type: none"> • Advantages and disadvantages • Number of tenancies that arise from housing options • How often GOHA staff are required to update personal action plans completed by applicants at another landlords • Value for money, if GOHA staff carry out all work associated with application process • Need to modernise the housing options form
	<p>GOHA considers whether it would be beneficial to form a Common Housing Register with other landlords in its area of operation to allow only one form to be completed by applicants.</p>
	<p>GOHA discusses the potential with GCC to develop a form for homeless applicants that can be completed at the “homeless unit / homeless service” that can be provided to the applicant to submit to landlords they would like to be considered for housing with.</p> <p>NOTE: It is our understanding that although homeless applicants should be referred to landlords as a Section 5 Referral, that this is not working as effectively as it should in Glasgow and that homeless applicants are encouraged to apply to / approach various landlords themselves.</p> <p>We consider at a time when people will be at their most vulnerable and may have very limited resources that this is unacceptable.</p>
5	Personal Action Plans
	Our comments
	We consider the form is straight forward and should be relatively easy to complete.
	Apart from page 1 the sections are very open and the detail included will depend on how well the applicant / officer completes the form.
	The form does not include clear sections to give details of current support being provided to the applicant and by whom.
	Our Recommendations
	<p>GOHA reviews and updates the form to include more specific sections that will assist agreeing housing need and priority of applicant, including details of:</p> <ul style="list-style-type: none"> • Support being provided to applicant and by whom • Additional support applicant requires • Details of any agency or advocate referrals made, along with date referral made and by whom
6	Information to applicants – website
	Our comments
	We consider it is positive that the GOHA website has a section on how to

	apply for a house which can be accessed easily from the home page.
	We consider it positive that people can request an application form straight from the web site.
	We consider it is not so positive that people cannot complete an application form via the website.
	We consider it positive that the website advises of number of people on waiting list.
	We consider it is a missed opportunity that this section of the website does not advise of how many properties GOHA has in each community or number of properties allocated the year or two before.
	We consider the frequently asked questions section is useful, but that it could be developed a bit further.
	There is a section on complaints on the website. However it is advised that in terms of points awarded for allocations, there is a right of appeal. See Appendix 3
	Our Recommendations
	GOHA updates the website to include an on line application form in the how to apply for a house section.
	GOHA updates the website to provide information on number and size of properties in each area, along with number of allocations each year per area for one or two years previous as well as number of allocations made.
	GOHA updates the website quarterly to provide information on number of applicants and allocations made.
	GOHA updates the frequently asked questions section to include more GOHA specific information.
	GOHA includes the right of appeal information referred to in the complaints section, in the allocations section and policy.
	GOHA considers developing short videos for website or social media to demonstrate the allocation process.
7	The Policy guide
	Our comments
	We consider “Your Guide to our Allocations Policy” is out of date and includes irrelevant information.

	Our recommendations
	We recommend the document is updated. Full details of our proposals are included in Appendix 2 .
8	Mock Interview
	During the mock interview we were led through the process by housing officer responsible for this area of work.
	Our comments
	The interview questions are thorough and officer probed further when answers seemed vague or unclear.
	The officer assured us that constant reference is made to the policy and procedures manual at all interviews.
	One of the forms used by the officer seems to be out of date and not very easy to use (the form with red and purple – still says Scottish Homes).
	We were assured that the process of agreeing points and housing need is thorough and evidence required is requested.
	Our recommendations
	GOHA continues to ensure staff are well versed and up to date changes to the policy as per the Housing (Scotland) Act 2014 and all other related legislation and Charter Outcomes.
	GOHA revises and updates forms to make them easier for officers to use and ensure all content is up to date and relevant.
	GOHA provides a brief note using info graphics for applicants invited to interview regarding what they should bring on the day. NOTE this is to assist people with limited literacy skills or English not as first language.
9	Complaints and compliments
	Our comments
	We understand that GOHA has no recorded complaints or compliments with regard to the housing allocation policy and procedure. Although this may be considered as a positive outcome for the Association, that there are no complaints, we consider that information gathered from complaints can assist organisations identify and implement service improvements, thus increasing customer satisfaction levels.
	Our recommendations
	GOHA ensures staff record ALL contact from applicants with regard to the housing application policy, process and procedure and where this is considered a service failure or dissatisfaction, that this is recorded as a complaint.

	<p>We consider this will assist GOHA:</p> <ul style="list-style-type: none"> • Comply with its own complaints policy • More easily address any appeals action taken by applicants • Comply with SPSO complaints handling guidance • Comply with the SSHC outcomes and ARC reporting • Reassure applicants, tenants, staff and Board Members that all applications are dealt with in a fair and consistent manner • Reassure applicants, tenants, staff and Board Members that all housing allocations meet the legislative requirements and that all allocations are fair and consistent • Increase satisfaction levels <p>NOTE: We consider GOHA’s message to everyone - Staff, tenants, applicants should be “A complaint is not a negative thing – it’s a way to improve service and increase satisfaction”.</p> <p>It should be an integral part of improving Customer Service.</p>
10	Letting Plan Information
	Our Comments
	The letting plan for 2018 / 19 identifies GOHA aim to provide high quality housing to those in most housing need along with creating balanced communities. We consider this is very positive.
	We note that under occupation is not currently included.
	We note that GOHA has not met its target for allocations to homeless applicants through section 5 referrals and understand this is due to issues with the Glasgow City Council Homelessness Service.
	Our Recommendations
	GOHA continues to meet housing need where it can and prioritise people in most housing need.
	GOHA includes applicants who are under occupying under reasonable preference.
	GOHA continues to explore options to house people in need via innovative measures such as joint tenancies to people who are not related or in a relationship or allowing children to share rooms in properties with larger bedrooms.
	NOTE We consider any alternative measures will need to be closely monitored and issues identified and dealt with quickly to ensure there are no negative impacts on other tenants.
	GOHA considers whether it would be appropriate or achievable to deal will homeless applicants directly.

	<p>GOHA allows people who are under occupying to move to a smaller property that may still be deemed too large for them. Such as single people or couples in a 3 or 4 bed property downsizing to a 2 bed property, even although they only qualify for a 1 bed property.</p> <p>NOTE: We consider this would assist GOHA make best use of housing stock available.</p>
11	Housing Need and Demand Template
	Our Comments
	We reviewed the Housing Need and Demand Template completed by GOHA on behalf of GCC and understand the aim of this is to assess needs, demand and supply across the city and may contribute to allocation of funding for new build housing.
	Under section 1 we note that the figures do not seem to add up.
	We consider that the figures provided in section 4 Turnover, does not seem to reflect the figures in section 2 Average Time on Waiting List.
	<p>NOTE In our brief review of the information, we consider that the form, rather than the information provided by GOHA is lacking.</p>
	Our recommendations
	GOHA considers developing its own needs and demand template that can provide a more accurate and clearer picture for GOHA on current and potential future trends as this may affect future investment and new build development decisions taken by the Association.
12	Mystery Shopping – requests for application forms
	Our Comments
	Staff responses to telephone call were very positive and application forms were received within 24 hours.
	Requests for application form made online were not so positive, with no response received for 4 weeks and had to be “chased up” by persons making the enquiry.
	Our recommendations
	GOHA advises staff of positive feedback from telephone mystery shops
	GOHA reviews procedure for processing on line requests to ensure responses and information are provided timeously and within timescales of Customer Service Standards.
13	Re-let timescales
	Our Comments

	We note the re-let timescales had improved between 2015 / 16 (20 days) and 2016 / 17 (17.1 days), but slipped to below the 2015 / 16 levels in 2017 / 18 (21.5 days). (based on SHR landlord report figures)
	Our recommendations
	GOHA carries out an assessment to find out why the figures have “dipped again” and puts plans in place to rectify this and improve performance.
14	Void Rent Loss
	Our Comments
	We note void rent loss has been increasing over recent years: <ul style="list-style-type: none"> • 2015 / 16 – 0.4% • 2016 / 17 – 0.5% • 2017 / 18 – 0.6% <p>At a time when rent arrears figures are on the increase due to the effects of Universal Credit, we consider this is not “good news” for GOHA as an organisation or its tenants.</p>
	Our recommendations
	GOHA carries out an assessment to find out why the figures have “dipped again” and puts plans in place to rectify this and improve performance.
14	Refusal of offers
	Our Comments
	We note that refusal of offers dipped from 58.6% in 2015 / 16 to 74.5% in 2016 / 17 and then improved to 39.1% in 2017 / 18.
	We are pleased to see that performance regarding offers refused improved in 2017 / 18.
	Our recommendations
	GOHA continues the good work in improving re-let timescales.
15	Other
	Our Comments
	It is our understanding that all properties should meet the GOHA Lettable Standard prior to applicants being offered a property therefore all properties should be in a very good and acceptable condition prior to viewings.
	However we also are aware that some complaints have been received regarding property standards at offer or after tenants move into the property.
	We are also aware that officers who allocate properties and accompany

	people to viewings do not see the property prior to this initial visit.
	Our recommendations
	GOHA ensures all properties meet the Lettable Standard in line with our recommendations in a previous scrutiny project.
	<p>Housing Officers responsible for allocations / viewings with applicants should visit the property with the inspector when property returned to GOHA by contractor to ensure officers are aware of condition prior to the initial visit with applicant and are able to ensure any issues rectified in advance.</p> <p>This would allow Housing and Technical Officers to advise of any work still required in the property, address issues such as cleanliness of closes, debris in gardens et al in advance of viewing to encourage applicants to accept offers.</p>
	SIG members carry out a mini scrutiny project of void properties.
	Our Comments
	We understand that when making an offer of housing / accompanying an applicant to a viewing that GOHA will only allow applicants to view one property, even if there is more than one suitable property available at the time.
	Our recommendations
	<p>GOHA considers allowing applicants, including homeless applicants to view up to 3 properties available and suitable to their needs at the same time and allow the applicant to choose their preferred property.</p> <p>NOTE: We consider this could:</p> <ul style="list-style-type: none"> • Encourage people to accept offer of housing quicker as there is some level of choice • Reduce refusal numbers
	<p>Where above recommendation was introduced, GOHA could have the next potential applicant lined up to be offered the properties the first applicant did not choose.</p> <p>NOTE: We consider this could assist GOHA to:</p> <ul style="list-style-type: none"> • Reduce refusal rates • Improve void rent loss figures • Improve re-let timescales

6. Next Steps

- a. SIG reps to meet with corporate management team to discuss report content and agree proposed changes.
- b. GOHA to circulate report to Board Members.
- c. SIG reps to present findings and recommendations to Board.
- d. GOHA to respond to report recommendations and agree implementation timescales with SIG.



Appendix 1

SIG views on what GOHA should consider for inclusion in revised allocation policy.

1	Reasonable Preference
	Should include: Applicants who are homeless or threatened with homelessness – to address need of such applicants as a priority in line with Legislation, Scottish Government and landlord intentions to eradicate homelessness.
	Housing Association or Local Authority tenants who are under occupying a property – to assist landlords meet housing need and demands through “freeing up” larger properties and provide suitably sized properties for single people or smaller families where possible.
	In addition we consider that preference should continue to be afforded to applicants who are: <ul style="list-style-type: none"> - Living in properties which are below the tolerable standard – although we understand that as per the Scottish Housing Quality Standard (SHQS) that housing association and local authority tenants should not be living in such properties. - Living in overcrowded conditions – we consider that families in need of larger properties should be assisted to move to appropriate sized houses where possible - Living in unsatisfactory housing – we understand that people’s homes can be unsuitable for a number of reasons and that the GOHA policy should continue to assist in rehousing of such people where possible - Are living in situations where they have unmet housing need – we understand that this could refer to a variety of situations and consider that the GOHA policy should address this where possible and where necessary staff should continue to work with other landlords and services in an attempt to accommodate these people as GOHA may not always be able to do so. For example GOHA has a limited number of one bedroom properties and does not have sheltered or supported accommodation.

2	Points System
	<p>We understand “the points system” will need to be updated to reflect legislative changes and our comments with regard to priority for housing are detailed above. We recommend this should include:</p> <ul style="list-style-type: none"> - The same number of points awarded to applicants with bedroom(s) too many or too few - Special points should continue to be awarded to people with specific needs such as those who have a terminal illness and house move could alleviate this
3	Home Ownership
	<p>We understand that the Housing (Scotland) Act 2014 indicates that landlords can now take account of home ownership within their allocation policies. Although we understand that there may be circumstances where a home owner may need to move to a housing association or local authority house, such as the need to move to supported or sheltered housing or own property no longer suitable to their needs, we consider that ownership should be taken into account when allocating properties as follows:</p> <ul style="list-style-type: none"> • People should not be able to own a house and be allocated one from a housing association or local authority • People could adapt home to meet changing needs and therefore not need or be eligible for housing association or local authority housing • People could sell their home and apply for a housing association or local authority house and pay rent to them <p>It is understood that finances change and people may no longer be able to afford their mortgage BUT people should not be able to rent out the house they own and be allocated a housing association or local authority house</p>
4	Suspensions
	<p>We consider that as tenants’ rents are the main source of GOHA income, that it is crucial that properties are vacant for as short a time as possible.</p> <p>We also understand that where offers of housing are refused that this has a negative effect on the re-let timescales and void rent loss.</p> <p>We also understand that applicants are encouraged and assisted to be as clear as possible on the type, size and location of properties they would like to be offered when completing application forms and invited to a housing options interview after two refusals.</p> <p>We consider the revised policy should:</p> <ul style="list-style-type: none"> - Include suspension of offers of housing after 2 offers are made.

	<ul style="list-style-type: none"> - Timescale of suspension from offers of housing should be 3 months. NOTE we consider if this was enforced people would be encouraged to be more specific in application forms and not just refuse offers as they think something better will be offered. - Where an offer of housing is made that is not within the applicants needs and wants as per application form, this should not be counted as a refusal.
5	New build allocations
	We consider it would be positive if GOHA allocated new build properties as “aspirational moves” for “good GOHA tenants”.
6	Succession, assignation, sub letting
	<p>In line with the Housing (Scotland) Act 2014, we agree that the qualifying period should be 12 months.</p> <p>In addition we recommend that GOHA clarifies the policy and practice for succession, where the property to be succeeded would be classed as “too big” for person or if property was designated for older people such as child or grandchild succeeding a two or more bedroom property on their own or type of property designed for older people (such as a bungalow).</p>
7	Short Scottish Secure Tenancies
	We consider it would be positive if this was introduced for antisocial tenants and applicants to allow GOHA to manage tenancies and protect other tenants from effects of antisocial behaviour.

Appendix 2

SIG recommendations on changes to the GOHA Allocation Policy Guide

A. Front cover	
	<ul style="list-style-type: none">• Design in line with new handbook• Add booklet number and date of issue• Include details re how to access guide in other languages / formats
B. Page numbers	
	Start on inside cover
C. Contents	
	Update as per new document
D. About us	
	<p>Established in 1991, Glen Oaks Housing Association owns and manages 1,297 homes in the Arden, Darnley and Pollock areas of South West Glasgow.</p> <ul style="list-style-type: none">- Arden = 1015, mainly 2 and 3 bedroom tenement flats- Darnley = 179, mainly 1 – 4 bedroom houses or cottage flats- Pollok = 104, mainly terraced houses with some one bedroom cottage flats <p>Add up to date details of management committee</p> <p>We aim to provide good quality affordable housing and effective management and maintenance services.</p>

In 2002 we introduced our Gold Service tenant loyalty scheme, which is aimed at rewarding tenants who keep to the terms of their tenancy agreement. Benefits include £52 per year of bonus bonds and a faster repairs service.

E. Who can apply for housing?

Anyone aged 16 years and over can apply for housing.

Our allocation policy aims to:

- address housing need
- alleviate and prevent homelessness
- maximise applicant access and choice

F. Making an application

The application form is designed to allow us to assess your housing needs and award points accordingly. Details of our points system is on page X of this booklet.

Applying for your first tenancy?

If you are applying for your 1st tenancy, we will encourage you to consider the costs of running a home. Our income maximisation officers as well as agencies such as Citizens Advice Bureau (CAB) can provide you with advice and make sure you have the finances and support required to help you move and keep your tenancy.

Welfare Benefit Changes

Please note major changes are being made to the Welfare Benefit System. If you are in receipt of benefits, please let us know. This will allow us to make sure you know and understand how the changes may affect you.

G. What happens when I send in my application form?

Step 1 - We will process your application and award points according to your level of housing need.

Step 2 – You will attend a housing options interview at our office, where you will have the opportunity to discuss your application, your preferred choice of areas and timescales for potential offers.

Step 3 – We will send you a letter advising of the points you have been awarded.

Step 4 – Your points’ award and areas chosen are put into our computer

Step 5 – When a property becomes available, everyone who asked for that area on their application form and whose housing need is suitable for the property will be automatically considered for it.

Step 6 – We offer the property to the person with the highest number of points.

NOTE – we cannot tell you your position on the list as this changes every day.

SIG NOTE

We recommend that GOHA considers identifying timescales for each step to allow:

- Applicants to understand timescales of each step
- Assist GOHA identify and meet targets in each part of the process

H. Homeless Applicants

Persons who are homeless or threatened with homelessness need to be assessed by Glasgow City Council’s Homelessness Service. If you are homeless you do not need to fill in a housing application form. If you are homeless or threatened with homelessness please contact the Homeless Casework Team on 0141 276 8201 or 07746 501 744.

Add other homeless information under this paragraph.

I. Restrictions

Although we accept all applications, we will suspend applications for the following reasons:

- You are behind with your rent or factoring charges or charges for repairs you are responsible for and have not made or maintained an agreed arrangement to bring payments up to date
- You have intentionally caused your current housing situation
- You have been found guilty of antisocial behaviour
- You are a registered sex offender and a risk assessment advises us against housing you
- You give false or misleading information
- You fail to provide relevant information required from your application
- You try to bribe our staff
- You have verbally or physically abused our staff

	- You or your partner and under immigration control
J. What size of property do I qualify for	
	Keep as per current booklet
K. Points Awarded	
	<p>Keep as is, with improved layout</p> <p>SIG recommends under occupation points should be same as overcrowding</p> <p>Insecure tenancy</p> <ul style="list-style-type: none"> - point 2 – SIG recommend clarification re repossession by bank and eviction by landlord - point 4 – separate each criteria to own bullet <p>Social or economic factors – SIG recommends – change to Social factors</p> <p>Physical environment – clarification required on:</p> <ul style="list-style-type: none"> - Why points awarded re. cannot manage large garden – SIG considers this seems high award - Is it manageable to award points re: children in various levels of closes when majority of properties in Arden are in closes? - Should priority be for children and adults with mobility problems rather than level of floor children live on – children are going to grow up and levels won't be an issue
L. Number of lets	
	<p>We do not consider this level of detail is needed</p> <p>Recommendation – change to: Number of houses – 1,297</p> <p>Number of lets in 2017 / 18</p> <ul style="list-style-type: none"> - Arden 125 - Darnley 13 - Pollock 6
M. Average rent levels	
	Update to 2019 / 20 levels
N. What we will do before letting	

	We are not sure this is needed re Lettable standard info provided to applicants at offer stage
O. Local Information	
	We recommends this is removed and made into a leaflet that can be provided at sign up
P. Debt advice	
	We recommend this is changed to Money Advice and kept in booklet
Q. Local facilities and activities	
	We recommend this is removed and made into a leaflet that can be provided at sign up.
R. Other housing providers	
	We recommend this is kept – but as Cairn has very few properties in the area wonder if it is worth including them?

Appendix 3

Extract from GOHA “Your Guide to our Complaints handling procedure”

What can't I complain about?

There are some things we can't deal with through our complaints handling procedure. These include:

- ▲ A routine first-time request for a service, for example a first-time request for a housing repair or initial action on anti-social behaviour
- ▲ Requests for compensation
- ▲ Our policies and procedures that have a separate right of appeal. For example, if you are dissatisfied with the level of priority you have been given when applying for a house, you may have the right to appeal against the decision
- ▲ Issues that are being dealt with through legal channels or have already been heard by a court or a tribunal
- ▲ An attempt to reopen a previously concluded complaint or to have a complaint reconsidered where we have already given our final decision following a Stage 2 investigation

If you are still not satisfied, you can ask the Scottish Public Services Ombudsman for an independent review of the complaint.

