

# Grainger Trust Limited ('GT') Allocations and Lettings Policy

March 2025

## 1. Introduction & Statement of Intent

This policy sets out the guidance which Grainger Trust applies to the allocation and letting of properties across our portfolio.

The guidance is underpinned by the Housing Act (1985) which sets out our obligation to publish rules on allocating properties. It also states the statutory minimum standards in regard to housing and specifically room sizes.

Grainger Trust also takes into consideration the following legislation when allocating and letting properties:

- The Regulator of Social Housing (RSH) Consumer Standards, Tenancy Standard (2024) and Codes of Practice (2024)
- Health & Safety at Work Act (1974) & Safety, Health and Welfare at Work Act (2005)
- Equalities Act (2010)
- Sex Discrimination Act (1975)
- Race Relations Act (1976), as amended by Race Relations (Amendment) Act (2000)
- Housing Act (1988), (1996), (2004)
- Disability Discrimination Act (1995), (2005)
- Data Protection Act (2018)
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations (2002) (2006) (2021)
- Localism Act (2011)
- Welfare Reform Act (2012) & Welfare Reform and Work Act (2016)
- Housing and Regeneration Act (2008)
- The Care Act 2014

## 2. Definitions

Grainger Trust works closely with Local Authorities to support their strategic housing functions via the use of properties owned and managed within the area. We aim to support Local Authority partners to fulfil their duties to meet identified local housing need. Applicants will be nominated by the local authority through the various applicant sources.

Grainger Trust takes its obligation seriously to ensure its properties are appropriately let in accordance with the above legislation. We allocate properties based on the number of bedrooms a household requires. Each double bedroom can be inhabited by the following:

- a couple
- a single person (aged 16 and over)
- two children of the same sex (aged under 16)
- two children regardless of sex (aged under 10)
- any other child
- a carer providing overnight care

We may also consider other factors relating to the household (e.g. long-term medical requirements).

'Letting' is the action of renting a property.

'Nominations Agreements' are set in place between Registered Providers (such as Grainger Trust) and Local Authorities, and allows the Local Authority access to the new build accommodation for the purpose of allocating nominations.

### 3. Policy Statement (including scope and aims)

Grainger Trust is committed to allocating good quality housing in a clear and transparent manner to best meet the needs of applicants. This overarching aim will be achieved through the following:

- Ensuring the most appropriate home is allocated to applicants
- Closely monitoring voids
- Ensuring properties are described accurately in adverts
- Working in partnership with Local Authorities to create a transparent and open approach to information sharing in order to ensure homes are allocated most efficiently and appropriately either via the Choice Based Lettings system or, where applicable, direct matches and management moves
- Develop local agreements with each council to support them to meet their strategic housing functions to meet local housing need.  
Ensuring that housing stock is utilised most effectively through the promotion of mobility within housing stock
- Adopting an Estate Management Strategy that promotes cohesive and safe communities
- Monitoring on-going performance through the Key Performance Indicators and report quarterly on this to the Grainger Trust Board
- Promoting staff development within the business to foster a high standard of customer service
- Making our business practice information readily available
- Reviewing policies and procedures 3 yearly (sooner if there is a change in relevant legislation) to ensure best practice standards are maintained
- Supporting residents to find and move to more suitable accommodation when their needs change

The Allocation and Lettings Policy is a key part of building a cohesive and safe environment throughout our properties and estates. The policy is not intended to exclude groups of people but is instead aimed to help achieve sustainable, balanced communities through the careful allocation of properties. This policy is to be reviewed in conjunction with the Tenancy Strategy which is key in helping Grainger Trust develop our local allocations plan.

### 4. Sources

Nominations are made either through the Local Authorities' Choice Based Lettings (CBL) systems or, where applicable, direct matches, management moves (transfers) and mutual exchanges.

Our local agreements with the Local Authority, will provide information on how properties of various sizes are allocated, with some differences between first lets of new builds and subsequent lets.

We reserve the right to operate different nominations agreements when letting new build properties.

## *Transfers*

For a small minority of lets, Grainger Trust will have the right to do a 'Management Move' or transfer, instead of referring the property to the Local Authority for nomination. Transferring between properties is a key part of the Allocation and Lettings Policy and aims to allow families to move to more suitable properties as their needs change. Transfers will be viewed in line with the guidance set out in the Tenancy Strategy. Priority will be given to individuals based on time spent on the waiting list and/or if they have high priority needs.

All applicants that are eligible for a transfer will be subject to the same criteria as Choice Based Lettings applicants. Such criteria will be set out in this document and the Tenancy Strategy.

## *Direct matches*

We reserve the right to operate a direct application scheme on certain properties where no grant funding or public subsidy is used or whereby there is a specialist housing type supplied.

## *Mutual Exchanges (Swaps)*

Residents have the right to find another tenant of a Registered Provider with whom they wish to do a mutual exchange. Grainger Trust has signed up to a mutual exchange platform that all of our residents can use free of charge ([houseexchange.org.uk](http://houseexchange.org.uk)) to find suitable swaps.

The incoming resident will need to undertake and pass the same suitability assessment and referencing process described below and both parties must have clear rent accounts in order for Grainger Trust to approve the mutual exchange. Once the two parties have agreed that they wish to progress with the swap, contact the Grainger Trust team to progress the formalities.

## *Other Sources*

We reserve the right to use other allocation sources in order to let our Affordable Rent homes, if demand for cannot be met through existing sources.

## *Shared Ownership Properties*

Shared Ownership properties will be marketed for two months on the usual marketing portals for properties for sale, after which they will be allocated to the applicant with highest priority banding who applied first via our marketing agents.

### *Discount Market Rent Properties*

DMR properties will be marketed for rent via usual online marketing portals.

## **5. Offers and refusals**

### *First Contact*

It is the responsibility of the applicant to ensure that the Local Authority or nominating body holds the most up to date contact information for them, which must include as a minimum a telephone number and email address, if applicable.

Grainger Trust will attempt to contact nominated applicants as soon as possible after receiving the nomination. Grainger Trust will do so first by email, asking for applicants to confirm their interest. If no email address is given then this will be attempted via a phone call. The applicants will need to respond within 48 hours to confirm that they wish to proceed. If we do not receive a response within 48 hours a final telephone attempt to make contact will be made before referring back to the Local Authority for a new nomination on the basis of non-response.

Where nominations require Grainger Trust employees to contact their support workers, supported housing or family members, contact details for such parties must be included in the application if they are the main contact supporting the nomination. Failure to provide such details will result in the application being rejected.

## *Suitability Assessment*

After initial contact is made, we will conduct a questionnaire with the applicants. Applicants are required to be honest and open in their responses as any purposeful omissions or misleading responses may be grounds for refusal if later revealed. The answers to the questionnaire will allow us to determine suitability based on under/over occupation, risk to others and affordability.

Grainger Trust will then reference applicants via a third party referencing company that will collect references from current landlord and employer, if applicable, as well as conducting a Credit Check.

Grainger Trust reserves the right to reject applicants based on the findings of this report and any other information sources, specific examples to include but not limited to:

- History of non-payment of rent at previous property(ies)
- History of anti-social behaviour at previous property(ies)
- Reports of damage at previous property(ies)
- Conflicting information between questionnaire and reference report
- Affordability
- Undisclosed CCJs over £1,000
- Total amount of disclosed CCJs in excess of £3,000 regardless of repayment plans
- Support needs being beyond the scope that Grainger Trust can offer
- Risk posed to others
- Close relation to a Grainger Trust (or GPLC) employee

Our decisions will be made on a case-by-case basis, and we will factor in any relevant factors, to include but not be limited to:

- Health and disability of any member of the household
- Employment or income
- Education and training
- Community and family connections
- Housing need
- Ability to access alternative housing
- Homelessness prevention
- Any other relevant circumstances

Our decision may be appealed via the Complaints Handling Procedure.

## *Affordability*

As a guiding principle Grainger Trust looks for confirmation that the rent will not be unaffordable for the household i.e. it will comprise no more than 40% of the household's income. Where the household is in receipt of full or part Housing Benefit / housing element of Universal Credit, this will be accounted for.

Any other fixed outgoings such as Court mandated debt repayments may need to be taken into consideration.

Grainger Trust may ask applicants whether they have anyone that may be able to act as a guarantor for them, if affordability is a concern. A guarantor is not a requirement and inability to offer one will never be a reason for refusal, but Grainger Trust will use them where possible to allow us to offer tenancies to applicants who otherwise we would need to reject due to affordability concerns.

We may consider confirmation from the Council or Universal Credit that an applicant is eligible for full or part housing benefit / UC housing payment as the equivalent of a guarantor in full or in part.

## *Credit History*

If any applicant has a CCJ, other debt order or has been declared bankrupt, they may be asked to prove that these have been satisfied or alternatively must provide proof that a repayment plan has been entered into and is being adhered to.

We will consider applicants with debts of over £1,000 and up to £3,000 if the above is met.

We will consider applicants with debts over £3,000 only if the special criteria are ALSO met, which are:

- (1) Exceptional circumstances AND
- (2) Proactive effort has been made to tackle and clear the debt AND
- (3) Significant reduction in the level of debt AND
- (4) Overall debt is no longer growing

We reserve the right to decline applicants in line with the above but our decision may be appealed via the Complaints Handling Procedure.

## *Support Requirements*

Grainger Trust will make suitable adjustments to the allocations and lettings process to facilitate any support or access needs a nomination may have. Applicants should ensure that the information held by the Council prior to bidding is up to date so we can determine how best to support and contact them.

Grainger Trust is not a specialist supported housing organisation and so if the allocations team have reason to believe that an applicant's needs are beyond the level of support that we can offer, we have the right to decline to reduce the risk to the applicant.

Information about support requirements may come to Grainger Trust via the nominating Local Authority, support workers, current landlord or the applicant themselves. Grainger Trust will

always consult with the Local Authority about any concerns or possible rejection on this basis but does reserve the right to refuse pending these consultations.

Grainger Trust uses a translation service to ensure that a language barrier does not prevent us from offering the same level of service and communication. If an applicant feels that they would prefer us to use the translation service when communicating with us either verbally or in writing, we will be able to accommodate this.

### *Persons who pose a risk*

Grainger Trust will collect information from applicants and Shared Ownership applicants after they are nominated including information about any pending or unspent convictions. During our referencing process we will make enquiries with previous landlords about Anti-Social Behaviour history of an applicant.

Grainger Trust will review on a case by case basis whether a tenant that is nominated poses a risk to the public or other residents, a risk to the business or whether there is any risk posed to themselves. A specific risk assessment will be conducted, and the outcome will be subject to senior approval.

The decision will take into account a number of factors, specifically:

- individual circumstances,
- the information received and what was voluntarily offered,
- the level of risk that the nominee presents
- the current demographic within the property
- the location of the property.

The decision will normally be made within 14 days of receipt of the nomination. The decision can be appealed via our Complaints Process.

### *Deposit*

All nominations applying for a Grainger Trust property will be made aware when properties are advertised, and again in the initial questionnaire process, that Grainger Trust requests a minimum two-week deposit for all properties. This is standard for, and applicable to, all applicants.

Where nominations are in full time employment and will be covering the full rent themselves, with no help from Housing Benefit or Universal Credit, Grainger Trust will also require a rent upfront payment *in addition to* the standard two-week deposit. The total of this sum will be determined by their move date.

## **6. Probationary Period**

The Tenancy Strategy states Grainger Trust's approach to probationary period management and review.

## 7. Exclusions

Grainger Trust will not make the offer of accommodation when the following criteria apply:

Under-occupation - where this is by two or more bedrooms

Adaptations - where a property has been extensively adapted for someone with a disability who no longer lives at the property, the property will be reserved for another party who needs the adaptations in preference to a general needs applicant.

Multi-generational Tenancies – Grainger Trust will only issue tenancies to co-tenants where they are married, in a civil partnership or partners / co-habitees. Grainger Trust will not issue multi-generational tenancies for example, to a parent and child. Children, including those over the age of 18, can be permitted occupiers of the tenancy.

Un-nominated Parties – where an applicant was nominated by the Local Authority as a single occupier, Grainger Trust will not issue the tenancy to an un-nominated co-tenant such as a partner. This is because the Local Authority's nomination and application of priority rankings will have been determined by the position as a single occupier.

Financial - the tenant or their spouse has an income/assets/savings greater than the amount stipulated in the relevant local authorities Housing Allocations Scheme and it is reasonable and affordable for them to pursue another form of tenure; or if the property is unaffordable for the household (see above). For Intermediate Housing properties, this is defined as £60,000 outside of London and £90,000 inside London.

Conduct - where there is evidence of a trend of tenancy breaches which have been formally documented and reported but have been left unresolved

Grainger Trust will work closely with the Local Authority when granting or reviewing a tenancy, applying the criteria of the initial application when reviewing their probationary period and continuation onto the fixed term section of their contract.

## 8. Appeals

We recognise that any applicant has the right to appeal about a decision or complain about action taken or not taken.

Complaints, in the first instance, should be directed to the Lettings Co-Ordinator who will discuss the reasons for the decision.

If an applicant remains dissatisfied, appeals may be made using the Complaints Handling Procedure. All complaints will be investigated in line with the Grainger Trust complaints policy which is underpinned by the Housing Ombudsman Service Complaint Handling Code.

## 9. References

This policy should be read in conjunction with the following strategies, policies and procedures:

- GT Complaints Policy
- GT Tenancy Strategy



10. Review

This policy will be reviewed after 3 years or sooner, subject to changes in relevant legislation.

Document Owner and Approval

The Head of Grainger Trust is the owner of this document and is responsible for ensuring that this procedure is reviewed in line with the review requirements of Data Protection.

A current version of this document is available to all members of staff on the corporate intranet.

Document History

Policy Owner	Head of Grainger Trust
Date of last review	March 2025
Date of next review	March 2028
Version control	Version 4