

Lettings Policy Statement & Purpose

The purpose of this Lettings policy is to set out how Bromford lets its vacant homes to meet legislative, regulatory and Local Authority requirements and meets our Strategy.

It sets out how customers may find a home with Bromford, the criteria we apply when determining whether a customer is eligible for a home with Bromford and what a customer can do if unhappy with decisions made about a potential letting.

The lettings policy aims to:

- Provide affordable homes for people who cannot access market housing
- Provide our customers with a home from which they can thrive
- Be easy to understand, with a fair and transparent decision making, appeals and lettings process.
- Create communities and tenancies that are sustainable
- Contribute to the efficient letting of our homes, with minimal lost income whilst taking into account individual customer circumstances
- Contribute to the fulfilment of local authorities' strategic housing functions and of their statutory duties to meet local housing need and homelessness.
- Make best use of our available housing stock and to provide opportunities for customers to move across local authority boundaries.
- Prevent and detect fraud

Scope

Bromford owns and manages a diverse housing stock over an extensive geography in the midlands and the south west, working with a significant number of local authority partners.

This policy encompasses all of Bromford social and affordable, including supported and specialist, housing regulated by the Regulator of Social Housing.

Homes that are owned by Bromford Assured Homes are let at market rents and this policy does not apply to the lettings of these homes.

Reference Documents

- Letting Homes How To
- Empty Homes How To
- Tenancy Policy
- Mutual Exchange Policy
- Right to Rent Procedure
- Data Protection Policy
- Regeneration Policy

Legislative and Regulatory Requirements

The policy has been developed with regard to following legislative and regulatory framework:

- Housing Acts 1985; 1996
- Homelessness Act 2002
- Equality Act 2010

- General Data Protection Regulation and Data Protection Act 2018
 - Human Rights Act 1998
 - The Localism Act 2011
 - The Welfare Reform Act 2012
 - Immigration Acts 2014 and 2016
 - Homelessness Reduction Act 2017
 - Homes (Fitness for Human Habitation) Act 2018
 - The National Planning Policy Framework 2018 Annex 2
 - The Regulator of Social Housing's Regulatory Standards
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How we find Customers for General Needs homes

The arrangements for finding customers for our homes can vary from one local authority area to another and also depends on the type of home we have available for letting.

a. Nominations

A nomination is a term defined in the Housing Act 1996; it is an allocation made in accordance with the allocation scheme of the relevant local authority¹ and is, therefore, governed by the local authorities' published allocation schemes rather than this Lettings policy. An allocation to a home owned by a Registered Provider via a nomination is classed as a publicly funded service and, therefore, homes let via a nomination may not be let to someone who has no recourse to public funds regardless of whether there is a Right to Rent. This restriction does not apply when Bromford lets homes outside of any nomination agreements. It is the responsibility of the nominating authority to verify recourse to public funds.

A nomination takes place when a local authority either refers an applicant from the housing register to a provider of social housing through their own matching process or where the local authority, or someone acting on behalf of the local authority, operates a Choice Based Lettings (CBL) system. Those applicants who are eligible to bid on an advertised property are usually placed in priority order (in accordance with the allocation scheme) and Bromford is required to consider the first placed applicant as the nominee from the local authority.

Bromford has nomination agreements or service level agreements (in place of nomination agreements) with all local authorities where we have an obligation to accept nominations for housing in compliance with the statutory requirements². A nomination agreement sets out how many homes Bromford will offer to a local authority for nomination (expressed as a percentage of vacant homes per annum), as well as other things such as timescales, acceptable reasons for refusing a nomination and how disputes will be resolved.

The majority (ranging from 50% to 100% of our available homes) of our general needs homes are let via a nomination from a local authority's housing register. Each local authority, regardless of whether they have any retained housing stock, must, by law, have a published allocation scheme which sets out who qualifies for social housing and who is given priority for affordable housing and social housing in their district.

When we receive a nomination or a CBL shortlist from a local authority we will have regard to the relevant allocation scheme and the terms of the nomination agreement when considering whether we will make an offer of accommodation.

We must follow the terms of any nominations agreement. If there is a conflict between this Policy and the allocation scheme or nomination agreement, the nomination agreement may

¹ Housing Act 1996 s159 (2)

² Housing Act 1996 s170 and s213

permit our Policy to override the nomination agreement. If not the issue must be resolved in negotiation with the local authority with due regard to the published allocation scheme of the nominating authority and relevant case law.

b. Direct applications to Bromford

Bromford is a member of a Midlands-wide partnership called Homes Direct, which operates a CBL scheme along with a number of other RPs. We advertise the majority of our non-nomination empty homes in the Midlands on Homes Direct. Applicants are placed into priority bands according to the answers they have given on the online application form. The priority scheme used in Homes Direct is available on the Homes Direct website at www.homesdirect.org.uk. All homes in Lichfield are let via the Homes Direct CBL Scheme, in accordance with Lichfield DC's allocation scheme.

Anyone over 18 is able to register for housing on Homes Direct but offers of accommodation will only be made to those who bid successfully on an advertised property and who meet the eligibility criteria set out in this policy. Prospective customers registered on Homes Direct are also subject to checks to verify their housing needs and relative priority on a shortlist.

For homes outside of the geography covered by Homes Direct we may choose to let all of our homes via a local authority nomination or CBL scheme or we may choose to let to existing customers through a management move.

c. Management Moves

In exceptional circumstances Bromford may make a direct offer of a home to an existing customer outside of the nominations or direct application process. The decision to make an offer is at the discretion of the Head of Lettings following a request from a Neighbourhood Coach. Examples of when a direct management move may be approved include:

- customers whose home is subject to a demolition notice or where Bromford requires vacant possession of the existing home in order to regenerate the local area
- customers who are unable to manage in their existing home and suitable alternative accommodation has been identified by the Neighbourhood Coach
- to resolve an issue in a housing scheme where all other attempts to resolve the situation have failed.

Priority for all management moves is given to customers who are required by Bromford to move to facilitate a regeneration programme. We may also consider chain moves to facilitate the regeneration programme, so that we may agree to move a customer not directly impacted by the regeneration programme in order for a regeneration customer to move into the vacated home. In accordance with the Regeneration Policy, we will determine relative priority between customers affected by regeneration by having regard to the length of tenancy with Bromford.

Management moves will typically form 10% or less of overall lettings in any one year. The usual route for existing tenants to secure an alternative home will be via the Homes Direct CBL or through an application to join a local authority's housing register where the customer may fall into one of the reasonable preference categories as set out in the Housing Act 1996³³. Neighbourhood Coaches are aware of the local authority allocation scheme and waiting list access in their Locality.

d. Low demand homes

On occasion, we are unable to find a suitable customer through our usual nomination or direct application process. When this happens we may choose to source a customer via an alternative route (assuming the nomination agreement (if any) permits this). We may use an "Immediately

³³ Housing Act 1996 Part 6 (amended)

Available” advertising tool which features on some local authority CBL schemes, we may advertise in the local area or we may use a platform such as Right Move or Gumtree.

We may also make use of social media platforms such as a local community Facebook page or seek referrals from local networks or agencies within the community. Where we use a method such as this we will offer the vacant home to the first eligible⁴ person to express an interest to us.

e. Reciprocal agreements

We may occasionally enter into a reciprocal agreement with another housing provider where there is an urgent need for rehousing and the other provider has no suitable or available housing in the required area.

The other provider will then agree to offer one of their homes to meet the housing needs of a Bromford customer as part of the reciprocal agreement.

f. Referrals from a statutory or voluntary agency

We may let a small proportion of our empty homes via a referral from a statutory or voluntary agency, such as the National Witness Mobility Service or a Housing First Programme, linked to our reducing homelessness work. Where a referral of this nature has been made Bromford will directly match the customer’s needs to a vacant home.

Finding customers for Supported Housing

Bromford has a number of supported housing schemes in a number of local authority areas. For some of our Supported Housing we have specific referral arrangements with various external agencies, for example the local authority or a third sector organisation such as MENCAP.

Our supported housing schemes are varied and include:

- Retirement Living for older people in need of additional support and care provided by partners
- My Place Schemes offering safe and secure accommodation for adults with a learning or physical disability or enduring mental health diagnosis
- Temporary accommodation for households who have applied to a local authority as homeless or who are at risk of homelessness

The Lettings criteria arrangements for each scheme are individual to the scheme and are usually developed in partnership with the local authority or other commissioning body.

Some of Bromford’s Supported Housing Schemes no longer have any support attached to the scheme. These homes remain designated supported units and may still be let to customers who require supported housing, although the provision of support must be sourced by the customer or agencies working with the customer.

Mutual Exchange Scheme

We encourage existing customers who wish to move home to seek to find an exchange with another social housing customer. We subscribe to Home Swapper, a web-based mobility scheme through which customers can advertise details about their own home and the type of home and the area they would like to move to. The Home Swapper Scheme is free of charge to Bromford customers and offers matching facilities, suggesting potentially suitable exchange partners.

Mutual Exchanges are not lettings. Bromford has a Mutual Exchange policy which sets out the rules⁵ we apply when deciding whether to approve a mutual exchange application.

⁴ For eligibility see Property Eligibility section

⁵ Localism Act 2011

Making the best use of homes and Property Eligibility

Bromford has a broad variety of homes. Some homes have been built by Bromford, some were purchased on the open market and some have been transferred into Bromford ownership from local authority voluntary transfer agreements. As a result of this some of our homes are subject to different rules about who can live in them.

This section sets out some of the rules which we may apply when assessing who is eligible for the types and sizes of homes we have available for letting.

Whenever we advertise our homes on a Choice Based Lettings platform, or by any other medium we will make clear any restrictions on property eligibility.

a. Social size criteria

We are required by the Regulator of Social Housing to make best use of our available housing⁶. We make the best use of our homes by applying, as a minimum, the rules used by the Department for Work and Pensions when calculating what size home a household is eligible for. This standard is known as social size criteria.

The social size criteria allow one bedroom for:

- Every adult couple
- Any other adult aged 16 or over
- Any two children of the same sex aged under 16
- Any two children aged under 10
- Any other child
- A carer (or team of carers) who do not live with the customer but who provide overnight care

An extra room may be allowed for foster carers, households with disabled children or if someone in the household is in the armed forces.

Where a member of the household is pregnant, the unborn child will be taken into account for social size criteria once the household member is 24 weeks pregnant. Given that benefits may not be payable for the unborn child, due consideration will be given to affordability and the availability of Discretionary Housing Payments to meet any shortfall in Housing Benefit or Universal Credit entitlement.

When considering whether children form part of the household eligibility for additional bedrooms, we take into account payment of child benefit. We will only consider allowing a bedroom for children where the child benefit is paid to a member of the household applying for housing.

The social housing criteria is a minimum occupancy requirement and we may agree to let a home where older children (over 16) or household members of the same gender are required to share a room. When deciding whether to do this we will take into account the source of referral of the customer; for example, if the customer has been nominated from the local authority's housing register we will have regard to their published allocation scheme providing there would be no breach of statutory overcrowding definitions.

Property eligibility and the assessment of whether a household is overcrowded are different. Having a household where two same gender children share a bedroom does not necessarily constitute overcrowding.

The social housing criteria set out a minimum standard of occupation; we will only consider under occupying one of our homes where the property is of low demand and we have been

⁶ The Tenancy Standard

unable to let the home to capacity via a local authority nomination or through a direct application.

b. Adapted homes

We aim to make the best use of homes that have been adapted to meet the requirements of customers with mobility needs. We may do this by advertising a property and stating that priority will be given to customers who require the adaptations on medical grounds. We may seek professional advice from the customer's Occupational Therapist or an Occupational Therapist appointed by a local authority in order to assess the suitability of a vacant home.

Where a local authority has no one suitable on their housing register we will seek direct referrals from Adult Social Care or from any other similar organisation in the district that works with households in need of adapted properties.

c. Bungalows

Some of our bungalows have minimum age requirements. Where this is the case we will make this clear on nomination requests or advertisements.

Where a bungalow has no special features, such as a wet room, or where there is no age restriction, we will decide whether it should be advertised and let as a standard general needs home or whether to apply an age restriction where all the other homes in the same scheme are currently occupied by older people. We will make any restrictions clear on advertisements or to local authorities when requesting a nomination.

Two bedroom bungalows will be let to households that are in need of two bedrooms. This could be a couple who are unable to share a bedroom for medical reasons or a single person who requires an overnight carer. We may agree to under-occupy a two bedroom bungalow where there is no demand from anyone in need of two bedrooms.

d. Section 106 requirements

Some of our homes were built with planning permission that had conditions attached to it. Where this is the case this is known as a Section 106 site which refers to the section in the relevant legislation.⁷

These requirements are site specific and will override any aspects of this policy that may conflict with them.

The most common features of a S106 agreement relate to the requirement for Bromford to seek nominations from the local authority and to restrict eligibility for the homes to those with an established local connection to the area.

The local connection requirements vary from site to site but Bromford will make clear the requirements in all advertisements for homes affected by a s106.

e. New build homes

Where a new development is subject to planning constraints, such as a S106 Agreement or where Bromford has received funding to assist in developing new homes, there is a usually a requirement for all first lets of the new homes to be offered to the local authority for nomination from their housing register.

Occasionally we have an agreement with a local authority to house some existing Bromford customers into the new homes where those customers are affected by demolition or regeneration plans or where the customers used to live on the site and an agreement was made that they would be able to return to a suitable home on the new development.

⁷ Town and Country Planning Act 1990

f. Local lettings plans

We occasionally develop a local lettings plan with a local authority for new developments and for existing housing schemes within a Locality.

The purpose of a Local Lettings Plan for new developments is to create a balanced and sustainable community when the homes are let for the first time.

Local Lettings Plans may also be developed for existing homes where there has been a history of high turnover and anti-social behaviour. These will be time limited and reviewed. Where there is a nominations agreement in place, these will be developed in conjunction with the local authority.

Starting Well

We want to get our relationship with customers off to the best start and ensure that the offer of a home is the right step for the customer to start their journey with us. This involves getting to know our customer and ensuring that they are ready to move.

To do this, we will ask customers to:

- Complete a customer questionnaire online or by telephone
- Agree to Bromford carrying out any appropriate checks such as credit checks and home ownership searches
- Provide us with clear income and expenditure details including showing us bank statements
- Agree to pay rent by Direct Debit or an alternative payment method agreed with the Neighbourhood Coach
- Provide proof of identity for all household members
- Provide proof of National Insurance number for the applicant and joint applicant
- Provide references or contact details from previous landlords or agencies that they are working with
- Agree to meet with us in their current home

Without the above we are unable to get our relationship with the customer off to a good start and, therefore, may not be able to consider the customer, however, where customers have difficulty with any of the above due to support needs, language barriers or lack of internet access, we will offer assistance to them.

Deciding not to offer a home to a customer

Bromford aims to house those that are selected for an offer or nominated to us by a local authority. We use best endeavours to find solutions to barriers to housing for customers, however, there will be occasions when we decide that we are unable to offer a home to a direct applicant or accept a nomination from a local authority because the property in question is not suitable or because the customer is not suitable or ready for housing with Bromford.

We will consider every customer's individual circumstances before making any decisions; each one will be based on its own merits. However, if we decide not to offer a home to a customer we will explain our reasons clearly, as well as what the customer needs to do in order to be re-considered in future, we will also confirm our decision in writing.

A decision not to offer a home may be recommended by a Lettings Advisor or a Neighbourhood Coach and will be subject to final approval by a Lettings Team Leader. Where it is a Neighbourhood Coach who recommends an offer is not made the Lettings Team Leader will liaise with the Locality Manager to reach a fair, transparent and lawful decision.

Any proposed rejection of a nomination will be discussed with the nominating authority to ensure the rejection is in accordance with the authority's allocation scheme and the relevant nomination agreement.

The list below is not exhaustive and merely provides some examples of what we consider when making our decision to offer:

a. Affordability

Both new and existing customers will be required to demonstrate that the tenancy will be sustainable and that they can afford to pay the rent and service charges and have enough money left to live on.

We will carry out a credit check and affordability assessment on all joint applicants applying for a home with us, whether this is a new customer or an existing customer to help us in our decision making.

The purpose of a credit check is to gather information about a customer's current financial circumstances and in particular to highlight any unmanaged debt that may impact future rent payments. In a scenario of unmanaged debt we will encourage the customer to seek advice and assistance, coming to payment arrangements with creditors. If the level of unmanaged debt is such that it would impact the ability to pay rent, we may decide not to offer a home at that time. We will advise a customer refused housing on the grounds of affordability of the steps they need to take before applying to be considered for housing with Bromford again. Any proposed rejection of a nomination will be discussed with the nominating authority to ensure the rejection is in accordance with the authority's allocation scheme and the relevant nomination agreement.

At the home visit the Neighbourhood Coach will carry out a detailed income and expenditure assessment based on estimated expenditure in the new home. The Neighbourhood Coach will also discuss the amount of rent to be paid at the time of signing for the tenancy. Bromford expect a minimum of one month's rent to be paid at sign up and future payments to be made by direct debit. Where paying a month's rent at sign up would cause significant hardship for the household, the Neighbourhood Coach will request a minimum payment of 1 weeks rent and will explore alternative options with the customer to address the shortfall through an application for Discretionary Housing Payment (DHP) or a payment plan to bring the rent account into one month's credit. In very exceptional circumstances, for example, in some of our supported housing schemes such as hostels or for referrals from agencies such as Housing First we may agree to a reduced payment at sign up dependent on individual circumstances.

We may refuse to offer a home or to reject a nomination if the customer would have insufficient money left to live on after housing costs are paid.

We may refuse to offer a home or to reject a nomination if a customer has agreed with the Neighbourhood Coach to pay a sum at sign up and then fails to do so without exceptional or extenuating circumstances.

b. Anti-social or unacceptable behaviour

If any of the following apply to an applicant or a member of the household and we consider that the letting or allocation of housing would be detrimental to neighbours or the local community, we may reject a nomination or application. Any proposed rejection of a nomination will be discussed with the nominating authority to ensure the rejection is in accordance with the authority's allocation scheme and the relevant nomination agreement.

When making our decision we will consider all relevant circumstances and we will examine the strength of the evidence against the customer and his or her household. We will gather evidence and information from all available sources including but not limited to: probation officers, support workers, the police and previous landlords.

An unspent conviction will not result in an automatic rejection, each case will be considered on its merits, taking all circumstances into account.

We may decide not to offer a customer a home due to anti-social behaviour if (but not limited to):

- There are unspent convictions for offences that would make them unsuitable to be a tenant. All unspent convictions must be declared by the customer at telephone interview. If we later discover that information of this nature was withheld by the customer we may also decide to not to offer a home or, if already offered, take appropriate action to repossess the home. Examples of convictions that may make someone unsuitable to be a tenant include assault, causing damage to property, burglary, handling stolen goods, carrying offensive weapons, drugs offences and keeping dangerous dogs. These are stated for illustrative purposes and not intended to be an exhaustive list.
- The applicant or joint applicant has been evicted or had a possession order (suspended or outright) or an injunction made against them for anti-social behaviour, including harassment, intimidation, domestic violence whilst a tenant with a previous landlord and there is no evidence that the applicant has engaged with support services and/or there has been an insufficient passage of time to demonstrate a change in behaviour.
- The applicant or a household member has been verbally or physically abusive towards any Bromford colleague or any other person whilst a tenant with Bromford or through the Lettings process.
- The applicant or member of the household or guests or visitors to a previous home have perpetrated anti-social behaviour, harassment, domestic violence or other unacceptable behaviour including causing a nuisance or annoyance to neighbours and had tenancy enforcement action taken against them.

c. Housing related debt

If an applicant or joint applicant has any housing related debt, for example: rent or mortgage arrears, Housing Benefit Overpayments, service charge arrears, rechargeable repairs charges, court costs or any other debt owed to a landlord, Bromford will take this into account when determining whether to offer a home.

Relevant factors will include: the level of the debt – typically £250 or less (equivalent to 2-3 weeks rent), the lapse of time since the debt accrued and whether a payment plan has been entered and maintained for a minimum of 6 months, as well as the circumstances of the applicant at the time the debt accrued.

It is unlikely that an offer of housing will be made where someone:

- has a history of making sporadic or late payments to their landlord;
- has outstanding housing related debt and no payment plan is in place or where a plan is in place but has not been maintained for a minimum of 6 months.

Bromford is interested in whether behaviour has changed and, therefore, would expect to see a payment plan maintained for a minimum of 6 months or in the case of arrears that resulted in possession action being taken by a previous landlord for a minimum of 12 months.

Where an applicant is in housing debt as a result of the impact of welfare reform (such as through an under occupancy charge, a shortfall in housing benefit payments due to the local housing allowance cap or the benefit cap for families with children) and if rehousing would ameliorate their financial circumstances and present an opportunity to repay the debts, this will be taken into account when deciding whether to offer a home.

Any decision not to offer a home to an applicant or nomination due to housing related debt will be communicated in writing along with the steps that should be taken before being able to be considered again for rehousing with Bromford.

d. Sex offenders and prolific offenders subject to MAPPA

As part of our statutory duty to assist local authorities, Bromford may consider housing a sex offender or a prolific offender via a nomination.

Bromford aims to create safe, secure and sustainable communities and will have regard to the best interests of existing customers in the community. We may restrict offers of housing that are considered to be inappropriate in relation to any information gained via a risk assessment or support needs assessment.

We will work with relevant agencies to make a full assessment and carefully consider any risks before making a decision to offer a home to a sex offender or any other offender subject to MAPPA arrangements. The final decision not to offer a particular home will be made by a Lettings Team Leader and Locality Manager.

e. Existing customers transferring

We will not normally offer a home to an existing customer until they have lived in their current home for at least 12 months. We will not usually agree to transfer an existing customer who has not maintained the current home to at least the required Home Standard, or if there are current breaches of their tenancy conditions. Any customer selected for consideration for an offer whether by nomination from the local authority or by direct application to Bromford will be subject to an inspection of the current home and must have a clear rent account unless there are extenuating circumstances such as those set out in point c above.

f. Immigration status

We are required by law⁸⁸ to ensure that everyone aged 18 or over in a household has the right to rent a home in the UK. We will verify the right to rent either at the application stage or at home visit. We will ensure every adult over 18 has the legal right to rent or live in one of our homes.

The right to rent is distinct from having no recourse to public funds. If a customer has no recourse to public funds and is nominated to us by a local authority we will reject the nomination and return it to the local authority since housing via a nomination is classed a publicly funded service. If a joint application has been made and one of the applicants has no recourse to public funds we may still agree to house the household as long as one applicant has both recourse to public funds and the right to rent in the UK.

g. Sufficient financial means assets and home ownership

We will not usually consider offering a home to someone who owns a property in the UK or abroad or to someone who has sufficient income or assets to be able to rent a home on the open market.

We may carry out Land Registry and Credit checks and any other sources of information available to us to establish current or previous property ownership.

h. Availability of appropriate support

We will only offer a home to vulnerable customers where adequate support arrangements are in place. We will work with agencies to seek the required support before making the final decision. We will not offer a home where the customer refuses to or has demonstrated that they are unlikely to engage with any support that is put in place.

i. Minors (under 18 year olds)

⁸⁸ Immigration Acts 2014 and 2016

Anyone under 18 cannot legally hold a tenancy. We will only offer accommodation to under 18s if the tenancy is held in trust by a recognised agency and the customer has relevant support in place.

We will work with Local Authorities where they have a corporate parenting duty to assist in the housing of Care Leavers.

Bromford employees and their relatives

The Executive Director of Customer Experience or a delegated senior colleague must authorise offers of housing to existing or former employees, their close relatives, members of our Customer and Community Influence Network or Non-Executive Directors regardless of the source of the application.

Fraudulent applications or withholding information

Social housing is a valuable and scarce resource. We aim to ensure that our homes go to those who are in need of a secure home from which to build or rebuild their lives. We will not tolerate those who seek to defraud the system by obtaining a home for which they are not eligible or for personal gain such as subletting. Nor will we allow anyone to hold more than one tenancy within the social housing sector.

Social housing fraud is a criminal offence. Anyone found to have deliberately lied, provided false information or withheld information as part of an application will not be accepted as an eligible applicant by us. A tenancy obtained by deception will be subject to repossession action and possible criminal prosecution by the local authority. If we discover any deception at application or offer stage we will cancel the application or withdraw the offer. Any other interested parties such as the local authority may be notified by us.

Appeals

Customers may appeal against our decision not to offer them a home, if they feel we have not taken into account all relevant information or have made the decision unfairly.

Appeals must be made in writing within 5 working days from the date of notification of decision not to accept an application or a decision not to make an offer. Bromford will not hold any homes empty whilst the appeal is being considered. However, if the appeal is successful, we will seek to offer a suitable alternative property.

The Head of Lettings will consider all appeals. Customers will be notified of the outcome in writing within 15 working days or within a mutually agreed timescale. If customer remains unhappy with the outcome of the appeal, then they should advise Bromford in writing of the reasons and this will be considered under Stage Two of the Bromford Complaints Policy / Procedure.

Recourse available to the customer, post Stage 2 complaint, is a complaint to the Housing Ombudsman 8 weeks after outcome and within six months or an application for a judicial review on a point of law.

Equality and Diversity

In operating this Policy Bromford will have regard throughout to its obligations under the Equality Act 2010 not to discriminate against any person with a protected characteristic whether directly or indirectly and to comply with our duties under the public sector equality duty to have had due regard to the need to eliminate discrimination, harassment, victimisation, advance equality of opportunity and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Bromford values equality and diversity. We will encourage a culture that challenges prejudicial behaviours and breaks down barriers to opportunities. We will ensure that our approach to equality

and diversity is incorporated in all aspects of our business and the services we provide including application of this Policy.

This means that where applicants face difficulties accessing services because of a vulnerability or disability or other protected characteristic we will take steps to ensure they can access their rights by other suitable means.

Monitoring and compliance

We will monitor the impact of this policy and associated procedures and processes:

- Via Board Key Performance Indicators and other Performance Indicators including the length of time to let our homes, void loss and customer advocacy
- Measuring and evaluating the number of rejections and reasons for rejections.
- Monitoring tenancy sustainment
- Through regular meetings with local authority partners
- The number of complaints, appeals and outcomes

Additionally, we will monitor compliance with this policy through Internal Audit, regular reporting to the Customer Experience Forum and an annual report highlighting performance, trends and lessons learnt.

Assurance Framework: Document details

Owner:	Head of Lettings
Approved By:	Board of Bromford Housing Group
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Next Review Due:	September 2020
Policy Version:	1