



**WATFORD
BOROUGH
COUNCIL**

Watford Nominations Policy 2025

Version 0.2

Version Control Sheet

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1. Introduction

Local authorities are required by law to adopt and publish an Allocations Scheme - in Watford we call it a Nominations Policy – which sets out the priorities for the allocation of social housing accommodation and the procedures to be followed in accordance with Part 6 of the Housing Act 1996, as amended by the Homelessness Act 2002, the Localism Act 2011 and most recently the Homelessness Reduction Act 2017. The policy covers who is eligible to apply for social housing and how priority for social housing is determined. It also sets out the procedures for nominating Housing Register applicants for social homes let within Watford.

Watford Borough Council (WBC) has a Nominations Policy, rather than an Allocations Policy, because all social housing available in the borough is owned by housing associations who are regulated by the Regulator of Social Housing or by other organisations, such as Hart Homes, which have been specifically approved by WBC. WBC nominates Housing Register applicants to the vacant homes of these organisations.

The rules for joining the Housing Register, determining priority and nomination applicants are the same as they would be for an Allocations Policy operated by a local authority with its own social rented homes as well as nominating to housing association vacant homes.

This document, the Nominations Policy, sets out:

- How to apply to the Housing Register
- Who is, and is not, eligible to join the Housing Register
- How Housing Register applicants will be assessed and prioritised for housing
- The eligibility for different types of homes
- How nominations to housing associations are carried out
- How Housing Register applicants can request a review of decisions made about their application or nominations.

2. Statement of choice

Watford Borough Council (WBC) operates a [choice based lettings](#) (CBL) system which allows applicants who have been accepted on to the Housing Register¹ to “bid” for – which means register an interest - in a home advertised on the CBL system. This system is used in preference to WBC deciding which applicant should be offered an available vacant home. CBL enables applicants to play a more active role in choosing where they live whilst also enabling WBC to house those in greatest housing need.

¹ See section [4.2 Who can apply to join the Housing Register](#)

WBC does not own any homes itself; it depends on partner housing associations to offer vacant homes for it to nominate Housing Register applicants who are able to bid. There are not enough housing associations homes for everyone accepted on to the Housing Register.

WBC also procures private rented homes primarily for households to whom we have accepted a homeless duty under the Homelessness Reduction Act 2017. These are households who:

- are threatened with homelessness (prevention duty)
- are immediately homeless (relief duty) or
- where WBC has accepted a duty to house because a household is unintentionally homeless (main duty).

These private rented homes may be located within and outside the borough. Affordable private rented homes are frequently located outside Watford. Private rented homes are an extremely important source of accommodation: homeless applicants are more likely to have their accommodation issues resolved via an offer of a private rented home rather than an offer from a housing association via the CBL system. Existing housing association tenants should also look at the private rented sector as a suitable housing option, especially where they need a larger home. Private rented homes in many parts of the country are usually cheaper than in Watford.

In addition to the private rented sector, there are other housing options that Housing Register applicants can pursue, including

- [low-cost home ownership](#)
- Existing housing association tenants can exchange their homes with other housing association tenants such as [Homeswapper](#), [Homefinder](#) or [House Exchange](#)
- Other rental products provided by housing associations and other organisations such as [Build to Rent](#) and Intermediate rent schemes.

3. Legal and Policy Framework

A full list of the local and national legislative and policy frameworks applicable to this policy is set out in Appendix A: Local and national policy and legislative context. This section of the policy gives a brief overview of the key legislation and policy.

3.1 The legal framework

This Nominations Policy complies with the provisions of:

- The Housing Act 1996 as amended
- The Allocation of accommodation: Guidance for Local Authorities June 2012 latest edition
- Equalities Act 2010

3.1.1 Reasonable preference

Under Part 6 of the Housing Act 1996, the WBC's Nominations Policy is framed to ensure "reasonable preference" is given to applications from the following groups:

- People who are owed a duty under Part 7 of the Housing Act 1996 which includes those threatened with homelessness, those intentionally homeless, not in priority need and those to whom the council has accepted a homelessness duty and is providing emergency or interim accommodation
- People occupying insanitary, overcrowded or otherwise unsatisfactory housing
- People who need to move for medical or welfare reasons, including grounds relating to a disability, and
- People who need to move to a particular locality, where failure to meet that need would cause hardship to them or others.

The above are statutory reasonable preference groups.

WBC also has groups of applicants to which it will give a local reasonable preference or priority. These are:

- Housing association tenants who would like to move to a home with fewer bedrooms than they have now
- Housing association tenants who are occupying homes with adaptations they no longer need
- Residents in supported accommodation within Watford's Single Homeless Pathway funded by central government and/or Hertfordshire County Council housing related support funding and/or by WBC funded who are deemed ready to live independently
- Residents in housing association-owned supported accommodation schemes funded by Hertfordshire County Council or Hertfordshire Partnership University Foundation Trust who are deemed ready to live independently
- Tenants of Housing First homes who need to move on due to central government funding requirements.

Local authorities must also give "additional preference" to the Armed Forces and -related groups listed below. These groups must also have housing circumstances that fall into one or more of the statutory reasonable preference groups set out above, and have urgent housing needs:

- Former members of the Armed Forces
- Serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service
- Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner

- Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service

3.2 The policy framework

3.2.1 Corporate policy

This policy enables delivery of [WBC's Council Plan for 2022-26](#) which includes the following themes:

- Theme 1: Be bold
- Theme 4: An inspiring, thriving and creative town

Reviewing and refreshing the Nominations Policy is being delivered under Theme 4.

Theme 1 is also important, as in addition to statutory requirements around the allocation of social rented housing in Watford, e.g. reasonable preferences, the Nominations Policy includes local reasonable preferences around single homeless people in the borough. Reasonable preferences are explained in Section 3.1.1

3.2.2 Objectives of the Nominations Policy

The council's objectives for the Nominations Policy are the following:

- To have a Nominations Policy document which is transparent and easily understandable for applicants, staff, and partners.
- To give adequate priority to people who fall within the statutory "Reasonable Preference" categories, including homeless people, whilst maintaining a balance between the needs of the homeless and other applicants in housing need
- To ensure that every housing register application is dealt with fairly and consistently
- To ensure that applicants have ready access to information and advice on their prospects of housing
- To give applicants, where practicable, the ability to express choice and preferences about where they want to live, taking into account the availability of affordable homes and the high demand for them in Watford
- To help promote safe, balanced, and sustainable communities using mechanisms such as Local Lettings Plans
- To make best use of the stock of lower rent/affordable homes in Watford to prevent homelessness and resolve under-occupation
- To allow Watford's Single Homeless Pathway to be open to new entrants by enabling clients within it to move on to settled accommodation when they are ready
- To let homes through the Choice Based Lettings system as efficiently and quickly as possible

- To be responsive to local housing needs by flexing housing quotas as needed
- To prevent homelessness where possible, encouraging planned pathways into settled housing and minimising the use of temporary accommodation for homeless households, particularly bed and breakfast accommodation

3.3 How this Nominations Policy was developed

This Nominations Policy has been developed in a number of ways including:

- Monitoring over time how well or otherwise the previous Nominations Policy met local housing priorities
- Monitoring and responding to national and local issues, legal cases, Local Government and Social Care Ombudsman decisions and legislation relating to the allocation of social rented homes
- Undertaking an Equalities Impact Assessment
- Consultation with a wide range of stakeholders including Housing Register applicants, Watford residents and partner housing associations

3.4 Monitoring and reviewing the Nominations Policy

The implementation and operation of this Nominations Policy will be monitored by WBC's Housing Department by:

- Regularly reviewing the Policy to ensure it continues to meet its stated objectives and complies with legislative changes.
- Publishing annual performance data

3.5 Delegated authority to make minor changes to this Nominations Policy

Minor changes to this Nominations Policy will be made in consultation with WBC's Portfolio Holder for Housing.

Minor changes are those which do not affect a large number of Housing Register applicants or involve a significant change in procedures. Where WBC wishes to propose major changes to this policy, consultation must be carried out first and a decision taken by WBC's [Cabinet](#).

3.6 Allocations not covered by this Nominations Policy

The following are not "nominations" under this Nominations Policy:

- An offer of accommodation to a tenant of a housing association who does not meet any of the reasonable preference criteria. Under the Localism Act 2011 such offers are not subject to the allocation rules set by section 166A of the Housing Act 1996.
- Succession to a housing association tenancy on a tenant's death pursuant to section 89 of the Housing Act 1985 or section 131 of the Housing Act 1996.

- Assignment of a tenancy by way of mutual exchange, or
- Assignment of a tenancy to a person qualified to succeed to the tenancy on the tenant's death, or
- Transfer of tenancy by a court order under family law provisions or under the Civil Partnership Act 2004, or
- A probationary (introductory or starter) tenancy becoming a fixed term tenancy
- A person being granted a family intervention tenancy
- Provision of non-secure temporary accommodation in discharge of any homelessness duty or power
- Allocations which housing associations make relating to their housing stock for which WBC does not have nomination rights.

3.7 Other matters affecting the allocation of housing association homes

3.7.1 WBC's annual lettings plan

WBC has an annual lettings plan, based on the financial year. The plan aims to ensure that housing association homes are distributed fairly and efficiently, taking into account factors like housing need, and the policy and legal requirements set out in this document. Housing associations homes are a very scarce resource in Watford, so the annual lettings plan also aims to provide transparency and clarity about what housing is available in the borough to address local housing need. This helps Housing Register applicants understand their chances of being housed and what other housing options they could consider.

The annual lettings plan sets out:

- the number of lettings expected in that year from existing housing association homes becoming available for letting again (relets) and new homes being handed over for letting, includes expected number of sizes of homes and
- which housing groups and the number or quota of households that will be prioritised for them. This includes quotas for housing groups such as from:
 - People accommodated in Watford's Single Homeless Pathway.
 - Existing housing association tenants with a reasonable preference to move (also known as transfers)
 - Homeless households
 - Other households with a reasonable preference

Even with quotas in place, nomination of Housing Register applicants to vacant housing association homes will continue to be based on the rules set out in this document (see section 5.2) in terms of need and length of time on the Housing Register.

An example of how expected lettings could be let in a year is set out in the box below:

100 homes with two bedrooms are expected to be let over the coming financial year. On the Housing Register, there are a significant number of homeless households in temporary accommodation as well as many overcrowded transfer cases. The quotas could be set as follows:

- 45 could be let during the year to homeless households in temporary accommodation
- 35 could be let to transfer cases who are overcrowded
- 20 to other categories of Housing Register applicants

Within the quotas, applicants would still be prioritised by Band and their Priority/Band Start Date.

Homes advertised on the CBL system will include information on which group they are being prioritised for.

WBC will monitor over the course of the year how many Housing Register applicant households are being housed in each group/quota and is able to explain why it has / not been possible to meet the quotas set. This will be reported to WBC's Housing Portfolio Holder at regular intervals and at least annually and published on its website together with any recommendations for change.

The quotas for different groups may vary from year to year depending on the need indicated by the Housing Register and the number of lettings expected in a year.

The annual lettings plan will be agreed with the Portfolio Holder for Housing and shared with partner housing associations with homes in Watford.

3.7.2 Local lettings policies

A local lettings plan is a separate document from this Nominations Policy that focuses on the allocation process for a specific housing scheme or development. In addition to housing need and local housing priorities, it takes into account considerations for a particular development addressing issues like tenant mix, affordability, the number of children in a location or disability needs.

Each local lettings plan is agreed with the Portfolio Holder for Housing and must be reviewed at regular intervals to ensure the factors used for nominations are still valid.

4. Applying to the Housing Register

4.1 What is the Housing Register?

The Housing Register is a record of people who have applied for social housing. Applications are assessed in accordance with this policy. A banding system is used to determine priority. Within bands, priority is usually determined by date order of application.

4.2 Who can apply to join the Housing Register?

Housing Register applicants must be **eligible** and **qualify** for an allocation of accommodation.

4.2.1 Eligibility

To join the Housing Register applicants are eligible if they:

- are aged 16 years of age or over
- are not subject to immigration control or be an applicant from abroad unless the applicant is an “eligible person” as prescribed in regulations by the Secretary of State
- are habitually resident in the Common Travel Area (England, Scotland, Wales, Ireland, Channel Islands and the Isle of Man). There are some persons from abroad who are eligible for an allocation of accommodation even if they are not habitually resident in the Common Travel Area.
- are qualifying persons as defined below:

4.2.2 Qualifying

A qualifying person is defined as:

- A person who falls into the categories of housing need set out in Bands A to C which are detailed in section 5.2.1
- Someone who is not excluded from the Housing Register because of the disqualification or suspension criteria
- meet the residency connection criteria defined in section 4.2.3

4.2.3 Criteria for disqualification or suspension from the Housing Register

The following criteria will result in applicants not being able to join the Housing Register (disqualification) or, if already an accepted Housing Register applicant, being suspended from it. The table below summarises the position followed by more information on defining each disqualification/suspension reason.

Disqualification / suspension reason	Outcome for Housing Register applicant	Outcome for already accepted Housing Register applicant
Housing Related Debt	Disqualification	Suspension
Unacceptable behaviour	Disqualification	Suspension
Does not meet residence connection criteria	Disqualification	Disqualification
Income, savings and assets	Disqualification	Disqualification
Not ready to move on from current supported accommodation (including Care Leavers)	Not applicable	Suspension
Transfers and Homeseekers refusing two offers ²	Not applicable	Suspension
Applicant is adequately housed or does not have a housing need	Disqualification	Disqualification
Is homeless, in priority need, has interest in a property but can't access it	Disqualification	Disqualification
Homeless applicant does not attend a viewing of a home when invited	Not applicable	Suspension

- Housing related debt:** Housing-related debt means rent arrears or former tenant arrears with a social or private rented landlord. Housing Register applicants are asked to declare whether they owe any rent to current or past landlords at application stage and again if they are going to be nominated for a vacant social home.

Most housing associations landlords will reject Housing Register nominees who owe them rent arrears currently or in the past. If a nominee is rejected for this reason, WBC will suspend the applicant from the Housing Register whilst the applicant makes arrangements to pay off the arrears. Where WBC becomes aware of rent arrears through information about County Court Judgements or money order judgements,

² This does not include Homeless applicants to whom WBC owes a Prevention, Relief or Main Duty under the homelessness law. These applicants are only entitled to one offer

then this will disqualify the Housing Register application on the grounds of making false statements or withholding information (see section 4.3.1).

WBC will use its discretion about suspending a Housing Register applicant where, for example, they are a tenant under-occupying a social housing tenancy or would release an adapted home. This would be subject to the agreement of the relevant housing association or partner organisation which owns the home.

Where WBC decides not to accept a Housing Register application, or suspend an existing Housing Register application, on the ground of housing-related debt, WBC will:

- Provide advice to the applicant on what they need to do to get on the Register or remove the suspension
- Set a date to review the application or suspension again.

The Review date will be no more than 6 months from the decision not to accept or suspend the Housing Register applicant.

- **Unacceptable behaviour.** Evidence of unacceptable behaviour by an applicant or a member of their household which is serious enough to make them unsuitable as a tenant, will result in WBC deciding to:
 - Not accept an applicant onto the Housing Register
 - Suspend an existing applicant from the Housing Register

Types of unacceptable behaviour that would be considered as making someone unsuitable as a tenant include:

- Having an unspent conviction³ of harassment or violence against a family member or neighbour on domestic, racial, homophobic, or disability-related grounds
- perpetrator of domestic abuse
- Being found guilty of taking over someone's home without their permission (cuckooing)

Evidence relied on to make decisions about unacceptable behaviour will come usually from the police, WBC Community Safety colleagues or a partner housing/support organisation.

If WBC decides not to accept a Housing Register application on grounds of unacceptable behaviour or suspend an existing Housing Register applicant, a date will be set to review the application or suspension, and advice will be given to the applicant on what they will need to do to address the unacceptable behaviour evidenced.

³ As per the Rehabilitation of Offenders Act 1974.

A review date of no longer than 24 months from the date of the application, or suspension, will be set.

Past anti-social behaviour, offending, drug and/or alcohol issues should not be a barrier to joining the Housing Register if the applicant is living in supported accommodation and having received adequate support is deemed ready to move on into settled accommodation by partner housing and support agencies.

- **Does not meet the residence connection requirement**

- See section 4.2.4

- **Income, savings and assets**

WBC will ask all applicants about the following factors, the answers and evidence to which will result in them not being able to join the Housing Register or being removed when applications are checked at 12 monthly intervals, or not being nominated for a housing association home:

- owns a property or has a legal interest in a property – unless the council has a homelessness duty towards the applicant
- Household capital or savings of £32,000 or more
- Total gross household income is above the level required for low cost home ownership (i.e. more than £80,000 pa)
- Total household net income is equal to or greater than four times the [Local Housing Allowance](#) (LHA) for a suitable property annually. (For single people, including under 35s, the LHA rate used is for a one bed home)

- **Deliberately worsening housing circumstances to gain housing priority**

- If WBC has reasonable evidence to suggest that an applicant has deliberately worsened their housing circumstances or failed to take reasonable action to improve their housing circumstances and as a result gained extra priority on the Housing Register, the applicant will be placed in the priority band they held or would have held before their circumstances changed.
- Applicants who have their band reduced will be notified in writing with the following information:
 - Reasons for the decision
 - Their right to a review of their banding
 - The timescale after which their application will be reviewed and what will be taken into account in the decision
 - The options they have available to them in the meantime and what WBC expects them to do in terms of working to improve their housing situation, e.g. looking for suitable accommodation in the private sector, registering for WBC's PRS Access scheme, saving for a deposit or seeking assistance from Watford Credit Union.

- The review period will be set on a case-by-case basis, usually at one year from the date of change of circumstances. This is to allow sufficient time for the applicant to demonstrate they have followed the advice of the Housing Service to find alternative housing options
- Examples of deliberately worsening housing circumstances include:
 - Moving from accommodation that was available for the applicant's occupation, that was suitable or more suitable for them than the accommodation they have moved into, and it was reasonable for them to continue occupying it
 - Homeowners who have transferred their property to another family member within the last five years from the date of their application
 - Applicants who have disposed of or deprived themselves of assets within the last five years of the date of application which could reasonably have been used to secure housing
- Applicants who have chosen not to access reasonable and affordable accommodation.
- Applicants that have failed to report disrepair or have refused access for works to be carried out by the landlord or WBC Environmental Health Team
- **Not ready to move on from current supported accommodation**
 - An applicant is currently resident in supported accommodation either within the Watford Single Homeless Pathway, HCC-funded supported accommodation or WBC Funded accommodation and is judged by WBC to not be ready to manage their own home without support based on information available from accommodation providers or support workers.
- **Non-homeless applicant refusing two offers**
 - Non-homeless applicants refers to Transfers and Homeseekers⁴
- **Adequately housed/does not have a housing need⁵**

For any of the reasons for disqualification or suspension, the council will consider exceptional circumstances in particular in relation to protected characteristics or circumstances relating to being a victim of domestic abuse and any government guidance.

4.2.4 Residence Connection

The residence connection for this Nominations Policy has two parts:

- a) the applicants must be living in Watford at the time they apply to the Housing Register, and at the time they are nominated for an offer of a home, and

⁴ See section [5.1 where housing applicant types are defined](#)

⁵ See section [5.4.1 for bedroom entitlement used to assess housing need](#)

b) they must show evidence of having lived in the borough for 5 out of the last 7 years.

The residence connection **is not applied** in the following circumstances:

- Applicants to whom we've accepted a homelessness prevention or relief duty
- Applicants residing in certain supported accommodation who instead need to demonstrate either 6 out of the last 12 months residence in Watford or 3 out of the last 5 years
- Applicants placed in temporary accommodation by WBC outside Watford who will continue to accrue residence as if they were living in Watford provided they remain in the accommodation they have been placed in.
- Applicants who previously lived in Watford and met the residence criteria but have been placed in temporary accommodation outside Watford by a statutory agency. Applicants must remain in the accommodation they have been placed in.
- Current or former Armed or Reserve Forces personnel or their bereaved spouses or partners.
- Care leaver applicants under 25
- Applicants who are victims of domestic abuse
- Applicants referred through the National Witness Mobility Scheme
- Tenants of housing association-owned homes where WBC has nomination rights to the resulting vacancy
- Tenants of social rented housing exercising their [Right to Move](#) as set out in the Allocation of Housing (Qualification Criteria for Right to Move)(England) Regulations 2015

Time spent living in Watford is not counted for Housing Register applicants who:

- Are placed in temporary accommodation in Watford by another local housing authority under their homelessness duties
- Live in a supported hostel or similar accommodation in Watford where their originating local authority is not WBC

Applicants can request a review of a decision about disqualification from joining or suspension from the Housing Register.

How to request a review is detailed in section 10.2.1

4.2.5 Housing applications from, and lettings to Members of the council, staff members, board members of housing associations and their relations

- **Applications:** Because of a potential conflict of interest, any Housing Register applicant, including existing housing association tenants, should declare on their application if they are:

- An elected member of WBC
- A WBC staff member
- A board member of a housing association that operates within the borough of Watford
- Related to any of the above

Related means the following:

- A spouse or civil partner or who live together as if they were spouse or civil partner
- A parent, a grandparent, child, grandchild, brother, sister, uncle, aunt, nephew or niece
- A relationship of half-blood is treated as a relationship of the whole blood
- A stepchild is treated as a child

All applications in any group set out above will be flagged on the WBC's computer systems to show their status under this section of the Nominations Policy. This is to ensure there is no undue influence in nominating these applicants to vacant housing association homes advertised on the CBL system for which they have placed a bid.

Where an applicant fails to disclose the above information, but it subsequently comes to WBC's attention, the Housing Register application will be closed. It also reserves the right to take action under section 4.3.1, Making false statements and withholding information.

- **Lettings:** the approval of a senior manager is needed for any lettings made to these applicants including seeking their approval for shortlisting before a formal offer of a home is made.

4.2.6 Duty of WBC's Housing staff to declare they are related to a Housing Register applicant

Any member of staff dealing with a Housing Register application from a person to whom they are related should:

- Declare this immediately to their line manager
- Not be involved in validating or verifying the application or amending it in any way on WBC's computer systems

WBC will take disciplinary action where a member of staff fails to declare they are related to a Housing Register applicant.

The definition of "related" is set out in section 4.2.5.

4.3 How to apply to join the Housing Register

Applications to the Housing Register are made by completing an [online form](#). The answers given by applicants in this form helps WBC to decide an applicant's entitlement to an allocation of social housing and what priority the applicant should be given.

Applicants will be asked to provide documentary evidence to support their application which includes the following:

- Proof of identity for each member of a household included in the application. Acceptable documents include an in date current passport for all adults or a full birth certificate, full birth certificates for all children, current eVisa or share code
- Proof of current address, e.g. a tenancy agreement or utility bill
- Proof of length of residence in Watford, one document per year showing your name and address
- Proof of eligibility (see section 4.2.1 above) if an applicant is from abroad, e.g. an eVisa or share code, a home office letter or passport confirming indefinite leave to remain
- Proof of income for all adults in the household e.g. benefit award letters, last 3 wage slips if monthly pay, last 6 if weekly pay
- Proof of any capital, savings or sole or partial legal interest in a property e.g. last 3 months bank statements for all accounts held
- Proof of child benefit, guardianship/adoption/foster certificate or court order confirming main custody of any children included in the application
- Proof of pregnancy

WBC also reserves the right to visit applicants at home to verify an applicants circumstances.

4.3.1 False statements and withholding information

It is a criminal offence for Housing Register applicants and/or anyone providing supporting information to knowingly or recklessly make false statements or withhold reasonably requested information relevant to their application (s171 Housing Act 1996 or s2 and s3 Fraud Act 2006). This includes but is not limited to information requested:

- on the Housing Register form
- in response to correspondence at the renewal of the application, or
- relating to any other review of the application.

An offence is committed if a third party provides false information whether or not instigated by the applicant. This would apply at any stage of the application process.

Where it is suspected or alleged that a person has either provided false information or deliberately withheld information, the Housing Register application will be “suspended” while an investigation takes place. The applicant cannot be considered for offers of accommodation until a satisfactory outcome of the investigation is reached.

Where the outcome of the investigation is that false information was not provided or information was not withheld, the application will be reinstated from the date of its original registration.

Where the outcome of the investigation is that false information was provided or information deliberately withheld, the applicant will be removed from the Housing Register or held ineligible to join it.

Where a housing association tenancy has been granted to a Housing Register applicant as a result of false statement by either the applicant or a person acting at their instigation, WBC will request that the housing association seek possession of the home.

If there is evidence that a criminal offence has been committed WBC may take instigate prosecution proceedings that could result in a criminal record, a fine or imprisonment if a person is convicted.

4.3.2 Who can be included in a Housing Register application

- **Immediate family:** This includes:
 - The applicant
 - The applicant’s spouse, civil partner or partner. A ‘partner’ is anyone who lives with the applicant as their partner or who would live with them as a couple if they were able to do so.
 - Dependent children:
 - Includes children for which the applicant has legal guardianship and children that are adopted. Where children are part of a family/relative fostering arrangement, Children’s Services may be asked to confirm the long-term nature of the arrangement.
 - Are aged 18 (that is, up to the day before their 19th birthday) or under
 - The applicant provides the primary residence for the child/ren or at least 50% of their time is spent with the applicant.
 - WBC will ask the applicant for documentary proof of residency of dependent children such as an order from the court.

If WBC decides that some members of the household are not eligible to be included in the application, WBC will write to the applicant explaining the reasons for the decision and the applicant’s right to request a review of this decision.

- **Individuals who are not an immediate family member who have an extenuating need to live with the applicant in order to give or receive care or support**

Siblings, non-dependent children or extended family members will not normally be considered to be part of an applicant's household, unless there is some form of dependency. Examples are:

- A child (of the applicant or partner) aged 19 or over, who cannot live independently because of a disability or care need
- An adult relative who needs to receive care and other supported accommodation options are not available.
- A carer if someone in the household needs full-time care and no one in their immediate family is able to provide this

Applicants must explain in their Housing Register application why they wish to include people who are not regarded by WBC as immediate family. WBC will require applicants to provide supporting documents to confirm this need such as:

- An Adult Care Services or Children Services care plan
- An occupational therapy assessment
- Receipt of carers allowance
- Other evidence WBC thinks appropriate to make a decision

- **Family members not currently living in the UK**

WBC will not consider any family members not resident in the UK at the time a Housing Register application is submitted. These household members will only be considered once the family has been reunited in the UK and can demonstrate that the family member added to the application has leave to remain and/or recourse to public funds within the UK.

- **Joint or individual applications**

For a joint application to the Housing Register, both applicants have to meet the eligibility conditions.

In the event of a relationship breakdown, a couple are entitled to apply to the Housing Register separately.

4.3.3 Time to process a Housing Register application

WBC aims to process Housing Register applications within 30 working days.

The 30 working days will start from the day WBC has received all the documentation requested and needed to process an application.

4.3.4 Notification of being able to join the Housing Register

After a Housing Register application has been assessed, WBC will write to the applicant confirming the following:

- Whether the applicant is eligible and has been placed on the Housing Register
- The priority band in which the applicant has been placed
- The date that the applicant was placed in the band (the priority date)
- Their unique reference number
- The grounds for any negative decisions on eligibility or qualification
- How to have the decision reviewed

4.3.5 Notification of not being able to join the Housing Register

Applicants found to be ineligible and/or disqualified by any of the criteria set out in sections 4.2.1 and 4.2.2, will receive a letter by email explaining:

- WBC's decision
- The applicant's right of review of that decision (see section 10.2.1)
- Advice and information on alternative housing options

4.4 Changes in circumstances and contact details

4.4.1 Informing the council about a change in circumstances

All applicants must let WBC know immediately of any change in their circumstances which may affect their priority for housing. Not informing WBC about a change of circumstance could affect the applicant's priority for housing and/or result in an offer of accommodation being withdrawn.

A change in circumstances can include:

- A change of address for the applicant or any other person on their application.
- A change in their contact telephone number or their email address
- Any additions to the household or any other person the applicant would like included in the application, for example, the birth of a baby. WBC will decide whether the additional person can be included in the application.
- Any family member or other individual included in the Housing Register application who has moved out of the applicant's current home.
- Any change in income, assets or savings, where these are above the thresholds sets out in section 4.2.3
- A change in medical condition
- Urgent social issues such as an actual or a threat of domestic, hate or gang violence

4.4.2 How WBC deals with an applicant's change in circumstances

WBC will:

- ask the applicant to provide documentary proof of the change in their circumstances.
- reassess the Housing Register application to take account of the new circumstances.
- confirm in writing to the applicant whether they are still eligible to remain on the Housing Register and/or whether there is a change to their priority for housing, that is a change in banding.

4.4.3 Consequences of not telling WBC about a change in circumstances, including contact details

- **Not informing WBC about a change in circumstances**

Where WBC becomes aware that an applicant's circumstances have changed such that on the face of the change the applicant would no longer be eligible to be offered the home they have bid for, or would stay in the same banding, for example, when verification is done before the offer of viewing a home, the Housing Register application will be changed to "suspended" while WBC obtains further information to find out if the applicant is still eligible to remain on the Housing Register. WBC will provide written confirmation to the applicant of the outcome of its investigations which will include whether the applicant is still eligible (see section 4.2.1) or qualified (see section 4.2.2) to remain on the Housing Register.

- **Not informing WBC about a change in contact details**

Where applicants have failed to advise WBC of a change in their contact details and WBC is unable to get in touch with them when needed, WBC will assume the applicant no longer requires its assistance and will remove their application from the Housing Register.

- **How to tell WBC about a change in circumstances or contact details**

Applicants can tell WBC about any changes in their circumstances or their contact details by updating their Housing Register application.

4.4.4 Renewing Housing Register applications

Applicants will be required to renew their Housing Register application every 12 months. WBC will write to the applicant's last known address or contact them by email or telephone asking them to renew their application and providing a deadline to do so.

- **What happens if applicants do not respond to a renewal request?**

If an applicant fails to renew their application or WBC does not receive a reply by the 21-day deadline given, the applicant will be removed from the Housing Register.

Where an applicant has been highlighted as vulnerable, WBC will make particular effort to contact the applicants to check their circumstances before removing their application.

- **What happens with renewed Housing Register applications?**

Renewed Housing Register applications will be reassessed for eligibility, qualification and priority for housing.

Where a change of circumstances is indicated, WBC will request further information from the applicant to decide whether this changes their eligibility, qualification and priority for housing.

On completion of its reassessment, WBC will confirm the outcome in writing to the applicant

4.5 Reasons applications can be cancelled from the Housing Register

A Housing Register application can be cancelled in the following circumstances:

- When an applicant is housed by a housing association (aka registered provider)
- At the request of the applicant
- Where an applicant does not respond to requests for information or to renew their application within a specified time limit
- If an applicant becomes ineligible for housing or has a change of circumstance that stops them from remaining on the Housing Register
- If an applicant has knowingly withheld or given false, misleading or incomplete information in order to obtain a housing association tenancy

When a Housing Register application is cancelled, WBC will write to the applicant to notify them. Where an applicant has been highlighted as vulnerable, WBC will make particular effort to contact the applicants to check their circumstances before cancelling their application.

If an applicant wishes to rejoin the Housing Register at a later date this will be treated as a new application and a new registration date, also known as a priority date, will apply.

Where an application was not renewed within a specified time limit and the applicant subsequently wishes to reinstate it, they must put in writing to WBC the reasons why the application was not renewed. Where WBC agrees to reinstate an application, it reserves the right to amend the original date of registration (or the priority date) to disallow the period during which the application was cancelled.

5. Assessing and prioritising housing applications

This section of the Nominations Policy sets out how WBC assesses and prioritises Housing Register applications

5.1 Types of housing applications/applicants

Each application which is eligible and qualifies for inclusion on the Housing Register will be placed into one of three groups:

- **Homeseekers**

There are several types of applicants that fall into the Homeseekers group:

- applicants who are not homeless and may be living in the private rented sector or with friends or with family.
- applicants who are housing association tenants living in Watford but are not placed in the Transfer group (see below)
- applicants who are intentionally homeless and those not in priority need under the homelessness legislation^{6,7}

- **Homeless**

This category includes:

- Applicants who have asked WBC for help because they are threatened with or actually homeless and WBC has accepted a duty towards them under the Homelessness Reduction Act. There are three homelessness duties for local authorities:
 - a. a Prevention duty where a household is threatened with homelessness.
 - b. a Relief duty where a household is actually homeless; and
 - c. a Main duty where a local authority has accepted a duty to house because the household is unintentionally homeless and in priority need.
- Care leavers
- Applicants in Watford's Single Homeless Pathway and in HCC-funded supported accommodation also come into this category of housing application.

- **Transfers**

These are applicants who are already housing association⁸ tenants living in Watford but have a reasonable preference⁹ need to move home

5.2 Prioritising Housing Register applicants

The council uses a banding system to prioritise each housing application. Each band considers the reasonable preference categories set out in [section 3.1.1](#)).

The Bands are:

- Band A – High priority
- Band B – Medium priority
- Band C – Recognised housing need

⁶ s.166A(3)(a) Housing Act 1996

⁷ See section [3.1.1 for an explanation of reasonable preference](#)

⁸ See [Glossary in Appendix G](#) for types of housing associations included

⁹ See footnote 7 above

5.2.1 Placing applicants in Bands

- **Band A – High priority**

Types of applicants in Band A are the following:

Band A	Summary description of criteria
Suffering a life altering condition	The applicant’s current home is untenable because of their life altering condition.
Under-occupying social housing	The applicant lives in a housing association home which has too many bedrooms for their needs and they wish to move to a smaller home
Homeless applicants who meet the residence requirement	WBC has accepted a Main duty under the homelessness legislation and the household has lived in Watford for 5 out of the last 7 years.
Homeless applicants with children ¹⁰ for whom WBC has accepted a main duty to house under the homelessness legislation, and do not have the requisite residence connection and have been placed by WBC in temporary accommodation for more than 12 months	WBC has accepted a main duty to house under the homelessness legislation and have placed the household with children , in temporary accommodation. These households do not meet the residence criteria but they have not been able to move to settled accommodation after 12 months of being placed by WBC in temporary accommodation
Care Leaver	The applicant was a child looked after by Hertfordshire County Council and is ready to move on from care and live independently
Lacking two or more bedrooms	The applicant is severely overcrowded in their current settled home because they lack two or more bedrooms. This does not apply for an applicant placed by WBC in emergency accommodation because WBC has accepted a duty under the homelessness legislation
Armed & Reserve Forces members and their families	As part of the Armed Services Covenant, and statutory guidance, local authorities are required to give additional preference to Armed and Reserve Forces personnel and their families or the bereaved spouses and partners of Armed and Reserve Forces personnel and their families who must leave services accommodation
Necessary decants	These are the tenants of housing associations who may have to move permanently from their home due to redevelopment or major repair because the works cannot be carried out with the tenants in situ.

¹⁰ NB: An increase in Banding does not apply to Housing Register applicants who do not have children and have been in living in temporary accommodation for more than 12 months

Band A	Summary description of criteria
Over-riding social and welfare needs	This includes people who need to live in Watford to give or receive care which cannot be obtained elsewhere.
Releasing an adapted home	This enables priority to be given to a tenant of a housing association who no longer needs the adaptations in their home, releasing it for someone else on the Housing Register who does need adaptations.
Releasing a general needs home to move into older people's accommodation	Releasing a home of any size without adaptations owned by a partner housing association
Unsatisfactory housing conditions (including damp and mould)	Specifically for housing association applicants whose home is deemed insanitary or in an otherwise unsatisfactory condition, (including damp and mould) and the housing association cannot resolve with the household in situ, or cannot provide temporary accommodation while the issue is resolved or cannot provide alternative permanent accommodation. This will only apply if WBC have evidence from the Housing Association and from professional bodies, for example, Environmental Health, Building Control, Fire and Rescue.
Housing First	Residents of Housing First homes in Watford who, as part of the government's Next Steps/Rough Sleeper Accommodation Programme funding guidelines, are required to move on to other settled accommodation after 3 years.

- **Band B – Medium priority**

Types of applicants in Band B are:

Band B	Summary description of criteria
Lacking one bedroom	The applicant is moderately overcrowded in their current home because they lack one bedroom
Homeless applicants	WBC has accepted a Prevention or a Relief duty under the homelessness legislation
Homeless applicants who do not meet the residence requirement	WBC has accepted a Main duty under the homelessness legislation towards the applicant and the household has not lived in Watford for 5 out of the last 7 years.

Band B	Summary description of criteria
Single homeless people	Specifically, residents of Watford's Single Homeless Pathway and supported accommodation funded by Hertfordshire County Council or WBC who are ready to move on and live independently
Medical/social/welfare grounds	Applicants with a medical, social or welfare need to move within or to Watford.
Unsatisfactory housing conditions (including damp and mould)	Specifically for applicants in the private rented sector whose home is deemed insanitary or in an otherwise unsatisfactory condition, (including damp and mould) and the landlord cannot resolve with the household in situ; or cannot provide temporary accommodation while the issue is resolved; or cannot provide alternative permanent accommodation. This will only apply if WBC have evidence from the landlord and from professional bodies such as Environmental Health, Building Control, Fire and Rescue.

- **Band C – Recognised housing need**

Types of applicants in Band C are:

Band C	Summary description of criteria
Homeless applicants	Applicants who were homeless, but WBC has not accepted a duty to house because they were found intentionally homeless. WBC's obligation here ceases once all homeless duties are discharged and all reviews decided.
Transfers without reasonable preference	Housing Association tenants seeking to move but are adequately housed
Applicants over 50 years old	Applicants who would otherwise be considered adequately housed aged over 50 years seeking accommodation for older people
Homeless applicants to whom WBC has accepted a Prevention Duty, have a residence connection with Watford and have accepted an offer of a private rented home during the Prevention Duty period	Enable applicants threatened with homelessness to remain on the Housing Register and be able to bid on the CBL system for available social rented homes up to three years: <ul style="list-style-type: none"> • WBC has accepted a Prevention duty (meaning the client is threatened with homelessness) and during the Prevention duty period (up to 56 days from the date of the council accepts this duty), the applicant accepts an offer of an alternative home with a private landlord within or outside of Watford.

Band C	Summary description of criteria
	<ul style="list-style-type: none"> Where an offer via the Housing Register has not been achieved during the three years following the move to a private rented home, the Housing Register application will be closed, and the applicant will no longer be able to bid.

5.2.2 The Band Start Date – prioritising between applicants in the same Band

- **Band start dates for Homeseekers and Transfers:** When accepted onto the Housing Register, applicants will be given a “Band Start Date” which will be used to decide priority between applicants in the same Band who have bid (expressed an interest) for the same home on the CBL system. The Band Start date will not start until after WBC receives all the information needed to decide the Housing Register application.
- **Band start dates for Homeless applicants:** Where WBC has accepted a homelessness duty, applicants may join the Housing Register, and the Band Start Date will be as follows:
 - If WBC has accepted a Prevention Duty, then this will be the applicant’s Band Start Date.
 - If WBC accepts a Relief Duty for an applicant, then the Relief Duty date will become the applicant’s Band Start Date (i.e. the Band Start Date will change to the Relief Date where WBC previously had a Prevention Duty to the applicant).

Example:

An applicant was already on the Housing Register as a Prevention Duty case with a Band Start Date of 01/01/2024. They then became homeless with WBC giving them emergency accommodation on 20/02/2024 and therefore become a Relief Duty case for the council. The date of 20/02/2024 is the Relief Duty start date and thus the new Band Start date for that applicant.

When determining priority between applicants, the applicant with the oldest Band Start Date will have the highest priority. See also section 6.3.1 on why bids may be overlooked.

For applicants who are a member or former member of the Armed Forces, their Band Start Date is set at 12 months before their application date. The details of the regulation supporting this exception are set out in Appendix B – Additional preference for Members or Former Members of the Armed or Reserve Forces

For applications from homeless couples, WBC will treat both parties as an applicant and in the event of the couple subsequently separating whilst going through the homelessness process, provided both retain priority under the homelessness legislation, both will retain their current Band Start Date.

5.2.3 Moving between bands

Where an applicant has a change of circumstances a reassessment of their Housing Register application will be needed. This may result in a change in the applicant's Band and a change in their Band Start Date. The outcome of a reassessment could be:

- An increased level of priority as per this Nominations Policy and the applicant is moved to a higher band.
- A reduction in the level of priority so the applicant is moved to a lower band
- Staying in the same band
- Becoming ineligible to stay on the Housing Register

5.3 Number of offers possible

The number of offers of a housing association home a Housing Register applicant can get depends on their housing circumstances, as follows:

Housing Group	Number of offers
Homeless <ul style="list-style-type: none">• Applicants to whom the council has accepted a homeless Prevention, Relief or Main Housing Duty• Applicants accommodated within Watford's Single Homeless Pathway or within HCC funded single supported housing association schemes• Care Leavers	One
Homeseekers	Two
Transfers	Two

An applicant may request a review of an offer of a home they have received.

For Homeless applicants placed in interim or emergency accommodation at the time of receiving the offer because WBC has accepted a Relief Duty or a Main Housing Duty to house them: WBC will expect the applicant to move to the offer even if they wish to refuse it; the applicant is still entitled to ask WBC to review the offer. If WBC agrees the offer is unsuitable then the applicant will be able to bid for an alternative home again.

See section 10.2.1 on how to request a review.

5.4 Working out the size of home needed by an applicant

5.4.1 Bedroom entitlement

The bedroom entitlement set out in this section will be used to assess:

- Housing Register applications received on grounds of overcrowding
- The number of bedrooms an applicant can bid for on the CBL system

The standard assumes that where there are two reception/living rooms in a home, one will be used as a bedroom.

It should be noted that partner housing associations usually have their own bedroom standard and may use this to let their homes instead of this bedroom standard set out below:

- A single parent household is entitled to the same size of accommodation as a two parent household with the same number of children
- For households that include pregnant women, an additional bedroom will not count towards bedroom entitlement until the baby is born
- A studio flat is appropriate for a single person household or a couple without children
- A room with shared kitchen and bathroom is appropriate for a single person or a couple without children
- Children who are not permanently resident within an applicant's household on a full-time basis are not included in assessing the number of bedrooms needed
- Dependent adults or applicants with carers which are part of a household will be individually assessed¹¹

The following rules are applied regarding the number of bedrooms a household is eligible for

- 2 children regardless of sex aged under 10 are expected to share a bedroom
- 2 children under 18 of the same sex are expected to share a bedroom unless there is an age gap of 7 years or more and one child is aged 16+
- Children aged 10 and over of different sex are not expected to share a bedroom
- Dependent adults aged 19 or over will have their own bedroom¹²

In placing bids for vacant housing association homes on the CBL system, the following table indicates the likely number of bedrooms applicable per household composition.

¹¹ See [4.3.2 for how dependent adults or applicants will be assessed](#)

¹² See [4.3.2](#)

No. Rooms	Household Composition
Bedsit/Studio	Single person / Couple
1 bedroom:	Single person / expecting first child / Couple
2 bedrooms:	Parent(s) plus one child; Parent(s) plus two children under 16 years of the same sex (or where one is over 16, and the age gap is less than 7 years); Parent(s) plus two children of the opposite sex under ten years Single applicant or couple with dependent adult aged 19 or over
3 bedrooms:	Parent(s) plus two children of the opposite sex over ten years; Parent(s) plus two children of the same sex (or where one child is over 16 and the age gap is less than 7 years); Parent(s) plus three children depending on ages and genders Parent(s) with two children under 16 years of same sex (or where one is over 16 but the age gap is more than 7 years) and a dependent adult aged over 19
4 bedrooms:	Parent(s) plus 3 or 4 children or more depending on ages and genders Parent(s) with three children and a dependent adult aged over 19

All homes advertised through the CBL system will be clearly labelled to indicate the household size eligible to bid for each property. For example, each advert will say the number of bedrooms a property has and the number of bed spaces, such as a home with 2 bedroom of 4 bed spaces.

5.4.2 Additional bedrooms

The grant of additional bedroom(s) will occur in exceptional circumstances which include:

- Medical conditions or disabilities caused or made worse by sharing a bedroom or not having an additional bedroom. This will be assessed via medical and other supporting evidence from qualified agencies.
- The need for a live-in carer which has been verified by appropriate independent professional agencies
- Implementing the terms of a local lettings policy¹³

¹³ See [Appendix J](#) for more information

5.4.3 Applicants requiring a disability adapted home

Where an applicant has been assessed by WBC's Independent Medical Adviser as requiring a disability adapted home, the application will be flagged on the Housing Register so that it can be easily identified should a home with adaptations become available to let. Any home with adaptations will be advertised on the CBL system with the details of the adaptations available. Applicants flagged as needing an adapted home will be given priority should they bid.

Where an applicant successfully bids for an adapted home, viewing it with a disability adaptations specialist is suggested so that a quick assessment can be done of the feasibility of the home for the applicant. If it is agreed the home is not suitable for their needs and cannot be adapted to meet their needs quickly it can be withdrawn and not counted towards the number of offers the applicant is entitled to.

Where an applicant needing adaptations bids for a home without the appropriate adaptations, the bid will be considered and a viewing with a disability adaptations specialist arranged for an assessment of the applicant's needs and how quickly such adaptations can be done.

WBC will also work closely with local Occupational Therapy teams to assess the needs of applicants and ensure those in the highest need are identified.

5.4.4 Ground floor flats

Priority for ground floor flats may be given to applicants with medical problems who require this type of home and have been awarded Band A priority or who need disabled adaptations to their home. A home advertised on the CBL system will specify if it is being prioritised for this type of applicant.

5.4.5 Exceptional circumstances

Exceptional circumstances will be considered and agreed by the Emergency and Exceptions Panel¹⁴ taking into account whether:

- There is a verified need for an additional bedroom supported by appropriate independent professional agencies
- There is a proven link between the issues identified and the property size
- A larger home would be affordable to the household in the long term
- A larger home is likely to become available within a reasonable timescale
- There are alternative solutions for the household, e.g. independent accommodation arrangements for some family members

6. Bidding and nomination

This section explains how available to let housing association-owned homes are allocated through direct offers and through the choice-based lettings system.

¹⁴ For more information on the Emergency and Exceptions Panel see section 7.1

6.1 Direct offers or lettings

Not all homes owned by housing associations will be allocated via the choice-based lettings system (CBL). Homes that will not be allocated via CBL include the following:

- Specialist housing (such as flexi-care homes for older people)
- Homes that are not part of nominations agreements with WBC
- Homes that have been unsuccessfully advertised three times on the CBL system
- Homes where a government agency directs WBC to make an offer to a Housing Register applicant.

6.2 Choice-based lettings

Most homes owned by housing associations in Watford will be let through WBC's [choice-based lettings system](#) (CBL). Housing associations advertise vacant homes on the CBL system and Housing Register applicants who are eligible can place a bid for them. Eligible here means the Housing Register application is “live” and not “suspended” (see section 4.2.3 for criteria for suspension from the housing register). Placing a bid means a Housing Register applicant is letting WBC know they are interested in being considered for the home advertised; no money is involved. CBL enables Housing Register applicants to choose where they want to live rather than WBC deciding this instead.

6.3 Bid types

Most bids will be made by eligible Housing Register applicants. However, in the following circumstances, WBC can be involved in bidding:

- **Assisted bidding:** Where an applicant is vulnerable and there is no third party to support them, WBC will take responsibility for assisting the applicant to place bids. The applicant is not obliged to accept any bids made through assisted bidding
- **Management or auto-bidding:** WBC will place bids for suitable homes on behalf of Housing Register applicants to whom WBC has a Prevention, Relief or Main Housing Duty under the homelessness legislation, or a formal offer is being made for a succession case or for care leavers. Care leavers that do not have a homeless application, will be able to bid for the first 2 months of their application going live and after 2 months will be placed on auto bid.
- **Approved bidding:** Applicant bids involving sensitive issues such as witness protection or fleeing domestic violence will need to be approved as appropriate by WBC
- **Time-sensitive bidding:** Some applicants in Band A with an urgent need to move will be given a time limit to bid for homes on the CBL system themselves. These include applicants suffering a life-altering condition, necessary decants and releasing an adapted home. The time limit means the urgency of the situation is acknowledged for both for the applicant and WBC. After the time limit, WBC will review each case on its merits and a decision made as to whether:
 - The applicant should lose their priority status if the circumstances under which they were placed in the band no longer apply

- WBC may bid for suitable homes on the applicant's behalf under assisted bidding
- WBC may decide to extend the applicant's time limit for bidding and review the situation again

In reviewing an applicant's time-limit for placing bids, WBC will consider the following issues:

- Have any properties been advertised on the CBL system which met the applicant's needs during the time limit
- If so, did the applicant bid for them
- If their bid(s) were unsuccessful, why was this?
- Did the applicant receive appropriate support and help in accessing the CBL system
- Has the applicant's circumstances remained the same

6.4 How to place bids

Information on:

- how to place bids for any vacant homes advertised on the CBL system is available here: <https://watford.homeconnections.org.uk/watford-choice-based-lettings> and
- frequently asked questions are here: <https://watford.homeconnections.org.uk/fa>

6.4.1 Information on vacant homes being advertised on the CBL system

Vacant homes are advertised weekly on a Friday and remain open until the following Tuesday: <https://watford.homeconnections.org.uk/my-cbl/property-search>

6.5 Shortlisting bids for vacant homes

When WBC shortlists bids, the following factors will be considered:

- **Applicant's eligibility and qualification:** Does the applicant, including a joint applicant, remain eligible for and qualify for an offer and is in housing need
- **Property eligibility:** does the applicant's household fit the requirements of the home outlined in the advert?
- **Priority Band:** which Band is the Housing Register applicant in?
- **Priority Start Date:** where more than one applicant meets Property eligibility and Priority Band criteria:
 - the applicant with the earliest Priority Start Date will be nominated to the housing association, or,
 - where two applicants have the same Priority Start Date, WBC will decide who is most suitable taking all other factors into account.

The Band and Priority Start Date considered for shortlisting will be as shown at the Bid closing date, not the Bid starting date. This will enable changes in an applicant's housing circumstances taking place between bid starting and bid closing dates to be taken into account for shortlisting.

Housing associations may specify additional eligibility criteria set out in their own allocations policies.

6.5.1 Reasons why bids may not be accepted

Not all bids placed by Housing Register applicants are accepted. The reasons WBC overlook bids include the following:

- The applicant has accepted or prefers another offer
- The applicant has been nominated to a housing association for a particular offer of accommodation (whether bid for or not) and is awaiting the outcome
- The applicant is ineligible because they do not need adaptations in the home, or the adaptations are unsuitable for their needs
- The Housing Register application indicates safeguarding, or safety reason means a bid is not suitable
- The applicant does not meet the advertised priority criteria
- The applicant has current rent arrears with their landlord
- Home too small for the applicant's needs
- A change in the applicant's circumstances
- Applicant not ready to live independently
- Age limits apply, e.g. some homes advertised are for older people
- Applicant receives assisted bidding by WBC or third party and does not wish to proceed with the offer
- Applicant failed to provide documents requested, applies only to homeseekers or transfer applicants¹⁵
- Property unsuitable for applicant based on their identified medical need
- Band start date incorrect or incorrect band applied

6.6 Nominating Housing Register applicants to housing associations

6.6.1 Verification

WBC reserves the right to verify the circumstances and housing conditions of a Housing Register applicant before nominating them for a housing association vacant home.

The verification process must be done as quickly as possible to minimise delays for housing associations in re/letting their vacant homes.

¹⁵ See [6.6.1](#)

Housing Register applicants must supply documents needed speedily to not lose the opportunity of being nominated for a home they have placed a bid for.

The following actions will be carried out by WBC and applicants:

- WBC will contact the Housing Register applicant about their bid by telephone and/or email to find out if there have been any changes in their housing and household circumstances since they first applied to the Housing Register. For example, the applicant's address and household members will be confirmed. It may be necessary for WBC to complete a home visit and this may be at short notice due to the need to minimise delays.
- Documents will be requested. These include the following:
 - For existing social housing tenants and applicants placed in homeless emergency accommodation by WBC an up-to-date rent statement is needed. Applicants are advised to clear any current or former rent arrears or council tax debt immediately as otherwise they cannot be nominated
 - Statements for all bank accounts for the last three months for each of the adults in the application
 - Proof of income, savings and other assets
 - Proof of child benefit for all children
 - Where a child aged 16-19 is still dependent on the Housing Register applicant(s) but child benefit is not claimed additional evidence to show dependency will be required, for example letters from education and medical professionals
 - Proof of identity. This includes passports or share codes, birth certificates
 - To check continued eligibility, proof of immigration status if the documents supplied when originally applying to the Housing Register are now out of date. This includes EU Settlement Status letters or other home office decision letters or applications.
 - Proof of address for the last 5 out of the last 7 years
- Applicants who have debts with or monies owed to WBC or other landlords:
 - If it is not possible for an applicant to clear former or current rent arrears then they will not be nominated on this occasion, even if they are in a high priority housing band unless exceptional circumstances are agreed.
 - The applicant will be asked to set up a repayment plan and provide proof of having kept to it for at least 6 months and evidence the arrears left to clear are under 2 months for future successful bids on the CBL system. Although a repayment plan may have been kept to, it is the decision of the housing association whether they accept a nomination of an applicant with rent arrears.
 - An applicant may have exceptional circumstances which will be taken into account which led to arrears building up such as:

- Either the applicant or a member of their household face life threatening circumstances which mean they need to move immediately, such as domestic abuse
- The applicant is suffering severe financial hardship due to the loss of welfare benefits or unexpected bills such as paying for a funeral
- For applicants with other tenant arrears WBC will apply discretion before deciding whether to nominate an applicant. WBC will establish:
 - How much the debts are
 - Whether the applicant has taken debt advice, acted on it and entered into and begun to implement any arrangement to clear the debt
 - Whether any exceptional circumstances apply as for rent arrears above.

Once the above checks have been made, the applicant's name and contact details (including that of the joint tenant) will be forwarded to the housing association landlord of the vacant home bid for.

6.6.2 Affordability Assessment

The housing association which owns the vacant home the applicant has placed a bid on will undertake an assessment of the applicant's finances to assure themselves the applicant can afford the rent. This is called an affordability assessment.

Housing associations will ask for proof of income whether that is from a job and/or welfare benefits and will ask how the applicant spends their income.

Housing associations have their own methods for assessing whether they think Housing Register applicants have enough income.

If a housing association rejects an applicant on affordability grounds, the housing association must provide written reasons to the applicant for rejecting their application on this ground. If the applicant does not agree with the needs to take the decision up with the housing association.

6.6.3 Invitation to view a home

If an affordability assessment is successful, the housing association will invite the Housing Register applicant to view the home bid for.

The housing association's invitation to view a home will also state that:

- The home may not be ready to live in straightaway as it may still be occupied (as the current tenant has given notice) or repairs may still be needed. The housing association works in this way to reduce any delays for the applicant in getting them moved into a new home.

- The applicants will need to decide at the viewing about whether they will accept the home offered bearing in mind that this may be their only offer (see section 5.3 on number of offers different types of applicants can get).
- If the applicant, including a joint applicant, agrees to accept the home viewed, they may be expected to sign the tenancy agreement and receive the keys at the viewing or at a follow-up appointment. If the home is not ready to move in to, the housing association will arrange to sign the tenancy agreement with the applicant(s) at a later date. Joint tenants may include voluntary carers such as family and friends at the discretion of the housing association. Employed carers cannot be joint tenants.

6.6.4 Consequences of avoiding offers of suitable accommodation

Where an applicant does not attend an invitation to view a home, whether they confirmed they would attend or not, or does not provide documents requested by a housing association in advance of the viewing, WBC will suspend their housing application and contact the applicant to find out why. WBC will decide whether the reasons for not attending the viewing were reasonable or not.

Examples of acceptable reasons for not attending a confirmed viewing include:

- Life-threatening health issue
- Having a medical operation at the time of the viewing
- Breakdown of transport beyond the applicant's control, e.g. train or bus strike
- Bereavement requiring travel abroad

If WBC accepts the reasons for not attending the viewing on this occasion, then the housing application will be reinstated, and the applicant can bid again for vacant homes on the CBL system.

If WBC does not accept the applicant's reason for not attending the viewing, it will:

- If the applicant is a Homeless applicant, discharge its duty to house the applicant as this is deemed as refusing a suitable offer. The applicant is entitled to request a review of this decision. If the review is not successful and the applicant is occupying interim or emergency accommodation which WBC provided because they were homeless, the licence will be terminated with reasonable notice. The applicant will then have to find their own accommodation.
- If the applicant is a Homeseeker or a Transfer, and this is the applicant's second offer, WBC will suspend their Housing Register application for 12 months and they will not be able to bid on the CBL system for vacant homes during that time. However, should the applicant have a change of circumstances during this time, such as becoming homeless, having another child or a new medical issue, then the application can be reviewed and will be reinstated before the 12 months is up.

6.6.5 Decisions to be made at viewings and consequences

At a viewing of a vacant home, Housing Register applicants are required to confirm their decision about the home. There are four decisions that can be made, set out in the table below, together with the consequences for each type of housing applicant, Homeless Homeseeker, Transfer or Homeseeker:

Decision made by the applicant	Consequences of decision for Homeless Applicants	Consequences of decision for Transfers or Homeseekers
<p>Accepts the offer of the home</p>	<p>If the home is ready to move into, the housing association will ask the applicant to sign the tenancy agreement and give them the keys. Applicants will be required to immediately vacate their emergency accommodation.</p> <p>If the home is not ready to move in to, the housing association will make arrangements to sign the tenancy agreement with the applicant at later date.</p> <p>The Housing Register application will be closed and taken off the list.</p>	<p>If the home is ready to move into, the housing association will ask the applicant to sign the tenancy agreement and give them the keys to the home at the viewing.</p> <p>If the home is not ready to move in to, the housing association will make arrangements to sign the tenancy agreement with the applicant at later date.</p> <p>Both Transfers and Homeseekers will need to give notice to their current landlords (if applicable).</p> <p>The Housing Register application will be closed and taken off the list.</p>
<p>Accepts the offer of the home but says they will ask the council to review it.</p>	<p>Where the home is ready to move in to, the applicant will be asked to sign the tenancy agreement and be given the keys at the viewing. WBC will expect the applicant to move into the home and immediately vacate their emergency accommodation.</p> <p>If the home is not ready to move into, the housing association will make</p>	<p>Where this is the applicant's second offer, they will be asked to sign the tenancy agreement and be given the keys at the viewing where the home is ready to move in to.</p> <p>If the home is not ready to move into, the housing association will make arrangements to sign the tenancy agreement later.</p>

Decision made by the applicant	Consequences of decision for Homeless Applicants	Consequences of decision for Transfers or Homeseekers
	<p>arrangements to sign the tenancy agreement later.</p> <p>WBC will provide verbally and in writing information on how to request a review of the offer under the homelessness legislation including response timescales that apply. Review of offers to homeless applicants are dealt with under the homelessness legislation not this Nominations Policy.</p> <p>If the applicant's review is upheld (i.e. WBC agrees with the applicant's view), then the applicant will be allowed to continue bidding on the CBL system. If not upheld, then the Housing Register application will be closed and taken off the list.</p>	<p>WBC will provide verbally and in writing information on how to request a review of the suspension of their housing register application including response timescales that apply. See section 10.2 on Decisions in this Nominations Policy that can be reviewed.</p> <p>If the applicant's review is upheld (i.e. WBC agrees with the applicant's view), then the applicant will be allowed to continue bidding on the CBL system. If not upheld, then the Housing Register application will be closed and taken off the list.</p>
<p>Refuses the offer of the home and will ask the council to review the offer</p>	<p>The applicant will be advised they should still sign the tenancy agreement and move into the home while they request a review under the homelessness legislation.</p> <p>If applicant does not move into the home and WBC upholds the offer as suitable under the homelessness legislation, then the applicant will be asked to move out of the emergency accommodation with reasonable notice and they must find their own accommodation.</p>	<p>If this is the applicant's second offer, and the review does not go in their favour, they will be suspended from the Housing Register.</p> <p>The applicant can ask for a review of the decision to suspend them from the Housing Register.</p>

Decision made by the applicant	Consequences of decision for Homeless Applicants	Consequences of decision for Transfers or Homeseekers
<p>Refuses the offer of the home and will not ask the council to review it</p>	<p>WBC will inform the applicant verbally and in writing by email and/or letter that it will formally discharge its duty towards the applicant under the homelessness legislation. If the applicant currently lives in emergency accommodation provided by WBC, notice that occupation will be ended giving reasonable notice. The applicant will then need to find their own accommodation.</p>	<p>Where this is the applicant’s second offer, WBC can suspend them from the Housing Register for 12 months and they will not be able to bid for any vacant homes on the CBL system during that period unless the applicant has a change of circumstances requiring a review of their application (see section 6.4.4).</p>

6.6.6 Reasonable refusal decisions

Where the details of a vacant home have been recorded incorrectly on the CBL system and this has led to the applicant viewing a home which does not meet their needs, this can be taken into account in deciding whether a home was a reasonable offer or not.

7. Exceptions and Panels

7.1 Emergencies and Exceptions Panel

The Emergencies and Exceptions (E&E) Panel considers and makes decisions on Housing Register applications brought to it that include the following circumstances:

- (a) Urgent housing cases that do not fit the current Nominations Policy criteria, e.g. cases with no local connection, disability cases that do not involve homelessness, cases involving rent arrears or other housing-related debt
- (b) The priority of statutory reasonable preference cases concerning social, welfare and hardship issues which can also include cases under Multi-agency Public Protection Arrangements (MAPPA) and Domestic Abuse Multi-Agency Risk Assessment Conference (MARAC)

It is anticipated the number of cases under (a) will be around 1-2 per year and the number of cases under (b) will be around 10 per year.

Applying to the Panel

The Panel will meet once per month but can be brought together at short notice to consider and decide on urgent cases.

The Panel comprises at least three members of the Housing Team.

The officer processing the Housing Register application will complete an E&E Panel referral form, setting out the officer's reason(s) for requesting a decision by the E&E Panel. The officer will submit the E&E Panel referral form to the Resettlement Team together with any relevant documents needed to make a decision. The Resettlement Team will call a meeting of the E&E Panel to consider referrals

- If a case is urgent, within 2 working days
- If a case is not urgent, at a regular monthly meeting

The outcome of the Panel's consideration of a referral can be:

- More information is needed to make a decision
- The applicant shall join the Housing Register for specified, agreed reasons
- The applicant shall not join the Housing Register for specified, agreed reasons

A written decision from the E&E Panel will be issued to the applicant within 5 working days of the Panel receiving all information needed to consider the review. The Resettlement Manager will issue the decision(s).

Applicants can request a review of the decision taken by the E&E Panel. A request to review the Panel decision must be received within 15 working days of receiving it. See also section 10.2.1 on how to request a review of a decision.

Reviews will be decided by a senior Housing manager not involved in the original Panel decision. Their decision will be final and sent by letter/email to the applicant within 5 working days.

If the applicant is still not satisfied with the decision made, they can request that the Local Government and Social Care Ombudsman look into it. The contact details for the Local Government and Social Care Ombudsman are in section 10.3

8. Service Standards

8.1 What the council will do

In implementing this Nominations Policy, WBC will:

- Provide free advice and information about the applying for social housing
- Provide free assistance to Housing Register applicants who have difficulty when making an application, for example, difficulty in using WBC's online Housing Register application

- Make sure any information about available housing options is easy to find and understand
- Enable Housing Register applicants to state their preference about what type of home they would like to live in through the choice based lettings system (CBL system)
- Provide information to Housing Register applicants about what types of home are available in Watford and outside the borough.
- Provide information to Housing Register applicants on the likelihood of being housed and how long it may take
- Ensure all nominations to housing associations will be carried out in accordance with the rules set out in this Nominations Policy
- Make available:
 - The Nominations Policy, both in full and in summary, for download from the WBC's website
 - Supply a printed copy of the summary of the policy free of charge upon request
 - A printed version of the Nominations Policy at the Town Hall for inspection
 - A printed copy of the full version of the Policy to take away for a fee of £10 on request

8.2 Equality, diversity and inclusion

The Housing Nominations Policy will meet the requirements of the Equality Act 2010 as well as the objectives of WBC's [Equality Diversity and Inclusion Policy](#)¹⁶

Under the Public Sector Equality Duty WBC, as a public body, must give due regard to the need to:

- Eliminate discrimination, harassment, and victimisation and any other prohibited conduct.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

Giving due regard involves:

- Removing or minimising disadvantages experienced by people due to their protected characteristics.
- Taking steps to meet the needs of people with protected characteristics where these are different from the needs of other people.
- Encouraging people with protected characteristics to participate in public life or in other activities where their participation is disproportionately low.

¹⁶ <https://www.watford.gov.uk/downloads/file/2142/equalitydiversityandinclusionpolicy-final>

Fostering good relations involves:

- Tackling discrimination, and
- Promoting understanding between different groups of people.

In implementing its equalities duties in relation to this Nominations Policy, WBC will:

- Treat each Housing Register applicant fairly in accordance with their needs and where possible their preferences for housing regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation.
- Monitor the protected characteristics of applicants who apply to the Housing Register and those who are subsequently eligible and made an offer of a housing association home.
- Analyse the data collected to ascertain whether the rules and implementation of this Nominations Policy results in direct or indirect discrimination. Where discrimination is occurring and is not justifiable, WBC will take appropriate action to eliminate the cause of the discrimination.

9. The legal duties of WBC and Housing Register applicants

9.1. Confidentiality

All personal information provided to WBC by Housing Register applicants, their advocates or professional advisors is treated with utmost confidentiality.

By signing the Housing Register application form, applicants give their consent for WBC to disclose information about them which is necessary for nominating them to a home that may be available for letting by a housing association or a private landlord.

Information about Housing Register applications is only disclosed without an applicant's consent in the following defined circumstances:

- In accordance with s115 of the Crime and Disorder Act 1998 as part of a criminal investigation
- Where there is a serious threat to the applicant themselves or to another party's staff or contractors if the information is not disclosed
- Where information is relevant to the management or support duties of a proposed landlord or support organisation to ensure the health and safety of the applicant, a member of his or her household or a member of staff.

Medical information obtained from an applicant's GP or other healthcare staff cannot and will not be disclosed without prior consent from the professional(s) involved.

9.2. Access to personal information

For full information on what information WBC collects about you in relation to your Housing Register application and how you can access it, see the privacy notice for housing services: <https://www.watford.gov.uk/downloads/file/466/privacy-notice-for-housing-services>

10. Rights of information, review and complaints

10.1. Rights to information

S166A(9) of the Housing Act 1996 gives Housing Register applicants the right to request from WBC the facts of their case which it has taken into account when considering their application to the join the Housing Register or to nominate them to a housing association vacant home under this Nominations Policy.

Applicants are entitled to receive this information in writing together with how they can request a review of a decision made that they do not agree with.

10.2. Decisions in this Nominations Policy that can be reviewed

The table below shows the type of decisions that Housing Register applicants can asked to be reviewed together with the information on who will deal with the review requested.

A review is undertaken by an officer who did not take part in making the original decision.

Review description	Officer who will deal with the review
At Housing Register application stage	
Deciding the outcome of a request to review ineligibility for housing <ul style="list-style-type: none">See section 4.2.1 Eligibility	Member of the Housing Department not involved in the original decision
Whether facts have not been taken into account in assessing a Housing Register application <ul style="list-style-type: none">See sections 4.2.1 and 4.2.2 Eligibility, Criteria for disqualification or suspension	Member of the Housing Department not involved in the original decision
Decisions on banding <ul style="list-style-type: none">See section 5.2 Prioritising Housing Register applicants	Member of the Housing Department not involved in the original decision
Decisions on size of home needed <ul style="list-style-type: none">See section 5.4 Working out the size of home needed by an applicant	Member of the Housing Department not involved in the original decision
Whether a Housing Register Application should be cancelled <ul style="list-style-type: none">See section 4.4.4 Renewing Housing Register applications	Member of the Housing Department not involved in the original decision

Review description	Officer who will deal with the review
Reducing priority for housing <ul style="list-style-type: none"> See section 5.2.3 Moving between bands 	Member of the Housing Department not involved in the original decision
Decision of the Emergencies and Exceptions Panel	A senior manager not involved in the original panel decision
At offer of home stage	
Review of outcomes of refusing an offer of a home made under this Nominations Policy <ul style="list-style-type: none"> See section 6.4.5 Decisions to make at viewings and consequences 	Member of the Housing Department not involved in the original decision

10.2.1. How to request a review of a decision about a Housing Register application and timescales for dealing with reviews

If an Applicant wishes to review any of the decisions referred to in the table above, they must request a review within 15 working days from the date they were notified of the decision. The review request must include the applicant’s reasons for believing that the decision is inappropriate.

The request for a review can be made:

- verbally by booking an appointment with a Housing Register and Allocations Team officer or
- in writing by online form by the applicant or on their behalf by a representative at the council website ‘Applying for social housing – Requesting a Review’, at the bottom of the following webpage:
<https://www.watford.gov.uk/help-finding-home/applying-councils-housing-register>
- Extensions of a further 15 working days will be granted where justified by special circumstances. This will be decided by the Housing Officer based on the reasons given by the applicant.

In response WBC may request further information from the applicant to enable the review to be done.

WBC will make a decision within 40 working days of receiving all requested information for the review request. The deadline for WBC to provide a written outcome and the grounds for the decision taken will be communicated to the applicant in writing.

Reviews of decisions which relate to homelessness (Part 7 of the Housing Act 1996) are outside the scope of the Nominations Policy.

The contact details for requesting reviews are:

Web page <https://www.watford.gov.uk/help-finding-home/applying-councils-housing-register>

Email: housingsolutions@watford.gov.uk

Address: **For the attention of the Housing Department**
Watford Borough Council
Town Hall
Hempstead Road
Watford WD17 3EX

Telephone: 01923 226400

10.3 How to make a complaint

Complaints about the way WBC has implemented the Nominations Policy, or its associated procedures should be made using the council's complaints system which can be found online here: <https://www.watford.gov.uk/complaints>

If an applicant remains dissatisfied they can take their complaint to the Local Government and Social Care Ombudsman. More information on this can be found online here: <https://www.lgo.org.uk/>

Appendix A: Local and national policy and legislative context

Context	Specific reference material
Local corporate policy framework	<p>WBC Council Plan 2022-26 which comprises four key themes</p> <p>Theme 1: Be bold</p> <p>Theme 2: A greener, bright future</p> <p>Theme 3: An inspiring, thriving and creative town</p> <p>Theme 4: A diverse, happy and healthy town</p>
Regulatory standards	<p>Due regard has been had to the following regulatory guidance:</p> <ul style="list-style-type: none"> • Allocation of Accommodation: guidance for local housing authorities in England Updated June 2024 • Allocation of Housing and Homelessness (Eligibility)(England)(Amendment) Regulations June 2021 • Housing Health and Safety Rating System • Homelessness Reduction Act 2017 – Homelessness Code of Guidance • Providing social housing for local people, December 2013 • Public Sector Equality Duty • Improving access to social housing for victims of domestic abuse, November 2018 • The Social Housing (Regulation) Act 2023
Legislation	<p>The Nominations Policy complies with the following legislation:</p> <ul style="list-style-type: none"> • Housing Act 1985 • Housing Act 1996 as amended • Homelessness Act 2002 as amended • Anti-social Behaviour Act 2003 • Children’s Acts of 1989 and 2004 • Equality Act 2010 • Localism Act 2011 • Care Act 2014 • Data Protection Act 2018 • Immigration and Social Security Coordination Act (ISSC) 2020 • Domestic Abuse Act 2021
Related local policies	<p>The following local policies are related to the Nominations Policy:</p> <ul style="list-style-type: none"> • Private Rented Sector Discharge Policy • Temporary Accommodation Placement Policy • Hertfordshire Joint Housing Protocol • MAPPA Housing Protocol • Safeguarding Policy • Private Sector Renewal Policy
Related Strategies	<p>The following local strategies relate to the Nominations Policy:</p> <ul style="list-style-type: none"> • Homelessness and Rough Sleeping Strategy 2020-2025 • Housing Strategy 2015-2020 • Temporary Accommodation Strategy 2019-2024

Appendix B – Additional preference for Members or Former Members of the Armed or Reserve Forces

The Housing Act 1996 (Additional Preference for Armed Forces)(England) Regulations 2012 determine that local authorities must give “additional preference” where an applicant who falls within the reasonable preference categories, has urgent housing needs and who:

- Is serving in the regular forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person’s service
- Formerly served in the regular forces, has recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person’s spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service, or
- Is serving or who has served in the reserve forces and is suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person’s service.

Should an applicant as described above be assessed be placed in Band A-C status, their application will be backdated by 12 months. This means their “priority date” will be 12 months before their application date.

Appendix C – Circumstances when WBC will offer Housing Register applicants homes in the private rented sector

Homeless applicants

Under the Homelessness Reduction Act 2017, all local authorities have three homelessness duties which could result in applicants being offered a home in the private rented sector if a suitable one becomes available before a housing association home becomes available via the CBL system:

- **Prevention Duty** – where a household is threatened with homelessness, for example they have been served with a notice to leave by their landlord such as a S21 notice, WBC has 56 days in which to work together with the household to either save access to their current home or help find an alternative place to live
- **Relief Duty** – where a household is already homeless, interim accommodation can be provided where the household is in priority need while WBC works together with the applicant in the next 56 days to find them a settled place to live
- **Main Housing Duty** – where WBC makes a decision on whether the applicant has made themselves intentionally homeless or not. If WBC decides the applicant is unintentionally homeless, then, it will continue providing emergency accommodation and again work with the applicant to find a settled place to live.

WBC can discharge any of the above duties by offering the applicant a suitable offer of a private rented home even if they are on the Housing Register.

Transfers and Homeseekers

WBC may encourage some Transfers and Homeseekers¹⁷ to think about moving into or remaining in the private rented sector especially where there may be a lengthy wait for suitable accommodation to come up via the CBL system.

¹⁷ See section [5.1 for definition](#)

Appendix D – Assessing health and housing needs

Medical and mobility assessments

Where an applicant or a member of their household has a medical condition or disability that is affected by their housing circumstances, they will be asked to complete a medical self-assessment form. If the officer needs more advice or guidance they will refer to WBC's Independent Medical Adviser.

The Independent Medical Advisor may also advise on any other re-housing need such as a need for ground floor accommodation, adaptations or an additional bedroom.

WBC will review all advice and information provided from the applicant or member of their household or other professional involved in their care. It is the Housing Officer's final decision whether to award priority on medical grounds. When doing so they will look at:

- how the current accommodation is causing or affecting the condition
- how social housing would improve it
- the severity of the effect the housing is having on the condition
- the duration of the condition and any expected recovery time
- the severity in comparison to housing needs of other applicants
- what other housing options are viable that could improve the situation
- a comparison to the awards made to other applicants on medical grounds.

Circumstances that will not be considered for medical assessment include:

- pregnancy
- overcrowding
- minor illnesses (e.g. colds/flu)
- temporary disability such as broken limb
- people who are adequately housed

Appendix E – Releasing housing association homes

Releasing housing association homes

Housing association tenants living in or outside the Watford borough and where Watford Borough Council has nomination rights to those homes will be given Band A priority where they:

- under occupy family sized accommodation
- wish to move out of an adapted home
- occupy a general needs home and wish to move into a home for older people

Appendix F – National Witness Mobility Scheme

WBC supports the National Witness Mobility Scheme and shall consider referrals made to house witnesses at its discretion and in line with outward referrals made under the scheme. Accepted referrals will not normally exceed 2 per financial year.

When deciding whether to accept a referral, WBC will consider the level of risk the applicant is facing and the demand and supply issues for the type of accommodation requested.

Appendix G – Applicants living in supported accommodation

Role of supported accommodation providers

WBC expects supported accommodation providers to assist residents in submitting Housing Register applications which are detailed about an applicant's housing need and provide support in enabling an applicant to become tenant ready including having realistic expectations about the type and affordability of housing available locally and beyond Watford.

The supported housing schemes in Watford, include, but are not limited to;

- Watford Housing First
- Watford Single Homeless Pathway (WSHP)
- HCC-funded supported housing schemes
- HPFT-funded supported housing schemes

Homeless WSHP applicants: Where WBC has taken a homeless application from a resident in the WSHP, the resident can apply to the Housing Register. Where the supported accommodation is likely to be available to the resident for more than 6 months, WBC will discharge its homeless duty to that supported accommodation. At this point, the resident's application will be suspended until it is agreed between WBC and the supported accommodation provider, they are able to maintain a tenancy with a housing association or with a private rented landlord. The WSHP resident may be offered settled accommodation with either a housing association or with a private landlord depending on which becomes available first. They will get one offer of accommodation.

Appendix H – Overcrowding

Applicants who are overcrowded would normally fit into one of the following two categories: lacking one room, or, lacking two rooms or more.

Overcrowding bands will be assessed by calculating the number of rooms needed (see table at 5.4.1) compared to the number of rooms the applicants and their household have use of. Bathrooms and kitchens are not included in the assessment.

Under this policy, the council assumes that a single person with their own bedroom has an adequate number of rooms whereas a couple would need access to a living room, whether sole use or shared. Households with children are assessed as needing sole access to a living room plus the appropriate number of bedrooms.

For example:

- A couple with two girls aged 4 and 5 need two bedrooms and a living room, so need three rooms. If they live in a one bedroom flat with one reception/living room, then they have a total of two rooms. They need three rooms but only have two rooms so are lacking one room.
- A couple with a boy aged 5 and a girl aged 10 need three bedrooms, and a reception/living room so need four rooms. If they live in a one bedroom flat with one reception room, then they have a total of two rooms. They need four rooms but only have two rooms so are lacking two rooms.

Severe overcrowding will only be considered if the applicant lacks 2 or more bedrooms. This will be assessed by the Housing Options Officers. Applicants applying for priority on the grounds of severe overcrowding will firstly be asked to look for alternative more suitable accommodation with the assistance of the Housing Department.

The priority given to households living in an overcrowded situation reflects the detrimental impacts including but not limited to stress, strain on relationships, disrupted sleep, lack of space for essential possessions, impact on schoolwork, increased susceptibility to infection. For this reason, where priority is already given for overcrowding, additional priority will not be given for the same issues under another priority ground e.g. medical or welfare.

Applicants who do not have a homeless application with WBC and are ‘sofa-surfing’ will be treated as ‘lacking a bedroom’.

Appendix I – Local lettings policies

Section 166A(6)(b) of the 1996 Act enables housing authorities to have Local Lettings Policies (LLPs) to allocate particular social/affordable rented homes to Housing Register applicants of a particular description, whether or not they fall within the reasonable preference categories, provided that overall the authority is able to demonstrate compliance with the requirements of s.166A(3). S.166A(3) gives housing authorities the power to frame their allocation scheme (in WBC's case, its Nominations Policy) to give additional preference to some applicants who fall into the statutory reasonable preference categories (see section 3.1.1 above for these). This is the statutory basis for LLPs which may be used to achieve a wide variety of housing management and policy objectives. The lettings covered by a LLP must not dominate – make up a large proportion of - overall social rented lettings in an area at the expense of Housing Register applicants with statutory reasonable preferences. LLPs have to be consulted on before implementation. Consultation is with the housing association (registered provider) which owns the homes that will be the subject of a LLP. LLPs are agreed by WBC's Portfolio Holder for Housing. LLPs must be reviewed at regular intervals to check their objectives are still relevant.

The content of an LLP should cover:

- Clearly defined objectives for the LLP
- Which homes will be covered by the LLP
- Which type(s) of Housing Register applicants will be prioritised under the LLP
- The method for allocating the homes included in the LLP, e.g. direct lettings rather than via the choice based lettings system
- The outcome of an Equality Impact Assessment
- How often it will be reviewed

The LLPs currently in force are:

- Watford social rented programme – December 2022
- Local Authority Housing Fund – October 2023

Appendix J – Glossary of terms used in this policy

Term	Meaning
CBL	Choice based lettings system. CBL is the system used by WBC to advertise housing association homes available for letting. Only live Housing Register applicants can bid for available homes. Bidding means expressing an interest in an available home; no money is involved in the process. CBL enables Housing Register applicants to choose where they want to live rather than WBC deciding this instead.
WBC	Watford Borough Council
Housing associations	When we refer to housing associations in this document, we mean housing associations that are regulated by the Regulator of Social Housing which can include profit and not-for-profit housing associations. In the case of this policy, it also covers the joint venture vehicle, Harts Homes, which is not regulated by the Regulator of Social Housing.
Temporary accommodation	Temporary accommodation (TA) is a catch-all term for different types of accommodation provided under the homelessness legislation. TA covers “interim accommodation” provided by WBC under its Relief Duty and “emergency accommodation” is the term used when WBC accepts a Main Duty to house.
Prevention Duty	Local authorities have a duty to prevent the homelessness of households who are threatened with homelessness. They have a minimum of 56 days to do this and a successful outcome in that time is that either the household can remain where they are, or an alternative home is found.
Relief Duty	Local authorities have a duty to relieve the homelessness of households who are homeless (without a roof over their head), if they are in priority need, and must provide interim accommodation whilst the household and WBC work together to find alternative accommodation over a period of 56 days.
Main Duty to house	Where a Relief Duty case has reached 56 days without an alternative suitable settled accommodation being found, WBC must investigate and decide on whether the household lost their previous accommodation through their own fault. If they did, then WBC will likely decide the household is intentionally homeless and close their case, requiring them to move out of any temporary accommodation (i.e, interim accommodation) provided. Where WBC decides the household is not intentionally homeless, then they will continue to provide accommodation (now called emergency accommodation) until a suitable settled home is found.
Reasonable preference	The meaning of “reasonable preference” is set in section 3.1.1. This explains that WBC must have regard for statutory reasonable preferences and has some local reasonable preferences.
Priority need	Priority need for assistance applies to homeless households in the following categories: <ul style="list-style-type: none"> Families with children including expected children

Term	Meaning
	<ul style="list-style-type: none"> • Aged 16 or under 19 and still in full-time education • Vulnerable in some way due to mental or physical disability or impairment, including spending a long time in the armed forces or were medically discharged from the forces <p>Not all homeless applicants are regarded as in priority need which means WBC does not have to provide temporary accommodation if they are homeless.</p>
Settled home	Settled home means a home with a tenancy or licence agreement lasting 6 or more months and can be with a supported housing provider, a housing association, or a private landlord