

Social Housing Allocation Policy

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Housing Services Division



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County Council



1. Overview

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- 1.1 This Social Housing Allocation Policy (hence referred to as “The Policy”) has been framed in accordance with section 167(2) of the Housing Act 1996, which permits local authorities to give additional preference to applicants who have urgent housing needs.
- 1.2 This Policy replaces the previous Policy for allocating social housing approved by Full Council in December 2016 and the subsequent Emergency Allocations Policy (December 2022).
- 1.3 Full consultation with partners and the public was undertaken in the development of this Policy and it sets out the arrangements for how we allocate social housing in Carmarthenshire in a fair and transparent manner.
- 1.4 The Policy also sets out how we will nominate eligible applicants for homes in an area they wish to be housed. Where this is not possible, we may offer a suitable home elsewhere that meets their needs.
- 1.5 The allocation of social housing is governed by the law but reflects certain local priorities. Our local priorities have been developed in agreement with our Registered Social Landlord (RSL) partners because of increased demand on Social Housing in the County.
- 1.6 We operate a Common Housing Register with our RSL Partners. These organisations, together with the Council, constitute the ‘Partnership’ referred to in this document. This Policy applies to social housing provided by us, Carmarthenshire County Council, and the following participating RSLs:
 - Bro Myrddin Housing Association
 - Caredig Housing Association
 - Pobl Housing Association
 - Wales and West Housing Association
 - Stori Cymru Housing Association

Future partners may be added to the policy following approval by the Head of Housing.

- 1.7 The Common Housing Register ensures that all applicants applying for social housing have a single application process and are assessed using the same criteria. We work together with the aim to ensure all homes are allocated according to the Allocation Policy.

- 1.8 This Policy sets out who is eligible for the allocation of social housing, what we consider when we make the decision of the applicants banding, and how we allocate and make a reasonable offer of a home. The impact of the implementation of this Allocation Policy will be monitored and reported.
- 1.9 This Policy must meet our legal responsibilities and has been developed in accordance with the Housing Act 1996 (Part 6), the Housing (Wales) Act 2014, the Renting Homes (Wales) Act 2016, the Social Services and Well-being (Wales) Act 2014, The Children’s Act (2004), The Equality Act 2010 and the *Code of Guidance for Local Authorities: Allocation of Accommodation and Homelessness* (Welsh Government, 2016) - referred to as the “*Code of Guidance*”.

2. Eligibility and Preference

Eligibility

- 2.1 Anyone can apply to be considered for housing under this Policy. Not every applicant will be determined to be eligible and able to join the Housing Register (see 2.2 to 2.4 below). The Council maintains a Housing Register of housing applicants for itself, as well as for its Partners who have chosen to adopt this Policy.
- 2.2 Allocations can only be made to eligible persons and the Council cannot nominate to certain people coming from abroad with limited rights to remain in the United Kingdom or who are subject to immigration control (unless they are of a class prescribed by the Welsh Ministers – see 2.4). Persons from abroad can include British Citizens who have lived outside of the Common Travel Area and are not habitually resident in the Common Travel Area.
- 2.3 Persons subject to immigration control who are eligible for an allocation of housing accommodation and housing assistance are listed in Regulation 3 (persons subject to immigration control) and 4 (other persons from abroad) of The Allocation of Housing and Homelessness (Eligibility) (Wales) Regulations 2014. The Welsh Ministers prescribe the classes of person who (whilst not subject to immigration control) are to be treated as persons from abroad who are ineligible for an allocation of housing accommodation, or for housing assistance, respectively. This is set out in Regulation 1-3 here: [The Allocation of Housing and Homelessness \(Eligibility\) \(Wales\) Regulations 2014 \(legislation.gov.uk\)](#). These Regulations are subject to change and the relevant text of Regulation 3 at the date of assessment will be applied.
- 2.4 Other persons from abroad, who may be British or Irish citizens, or certain Commonwealth citizens, will be eligible if they are either habitually resident or exempt from the habitually resident test. The list of exemptions is at Regulation 4 here: [The Allocation of Housing and Homelessness \(Eligibility\) \(Wales\) Regulations 2014 \(legislation.gov.uk\)](#).
- 2.5 Nationals of European Economic Area (EEA) member states, and family members of nationals of EEA member states, will be eligible if they have settled status (falling with Class C of Reg 3). Nationals of EEA member states, and family members of nationals of EEA member states, who resided in the UK before 31 December 2020 and either have pre-settled status, or have an application for settled or pre-settled status which has not yet been determined, will be eligible if they have a qualifying European Union right to reside (such

as being a worker or a self-employed person) and are either habitually resident or exempt from the habitual residence test (Reg 4). EEA nationals, and family members of EEA nationals, who are frontier workers are eligible under Reg 4.

- 2.6 In considering whether a person is habitually resident, we will apply the test of a settled purpose of establishing residence and an appreciable period of residence. We will normally consider that a person is habitually resident if s/he has had an appreciable period of two years or more. If the period is less, we will consider the reasons for coming to the UK, employment, family ties, plans, and the person's centre of interest.

This list is general guidance and not intended to be exhaustive.

- 2.7 The Council is entitled, in accordance with S160A Housing Act 1996, to restrict access to its Housing Register by means of, and in accordance with, the introduction of additional eligibility conditions. The eligibility restrictions do not apply to existing contract-holders of local housing authorities, or of registered social landlords, if they were allocated their existing accommodation through a local housing authority (s.160(6) HA 1996).
- 2.8 Carmarthenshire County Council will restrict access to its housing register to a person if they or a member of their household, has been guilty of unacceptable behaviour serious enough to make them unsuitable to be a tenant of the authority; and in the circumstances at the time their application is considered, they are unsuitable to be a tenant of the authority by reason of that behaviour.
- 2.9 When the Council refer to "behaviour" it means anti-social behaviour and other prohibited conduct which comes within section 55 of the Renting Homes (Wales) Act 2016 and the Council is satisfied that an outright possession order would have been made under that section. This is set out in **Appendix One**.
- 2.10 If the Council decides that an applicant is not eligible because of anti-social behaviour, the applicant can re-apply in the future if, at the date of the new application s/he considers that they are no longer unsuitable to be a contract holder of the local housing authority (s.160A(11) HA 1996).
- 2.11 To join the Housing Register applicants must be 16 years of age or over.
- 2.12 It is important to note that, whilst we allow 16 and 17-year-olds to join the Housing Register, they cannot legally hold a contract in their own name until

they turn 18. This means that they will need to have someone who can act as a guarantor and hold their contract in trust for them.

Preference Overview

2.13 Preference will be given on the Housing Register to applicants who:

- have a housing need.
- wish to be considered for sheltered accommodation and accommodation for older people (for over 55s); are requiring extra care housing (Housing with care and support); have been assessed as requiring an adapted home; or wish to register for Low-Cost Home Ownership (LCHO).
- are unable to financially meet their own housing needs based on a comprehensive financial assessment by an officer.
- are living or working in the local authority area and/or meet the local connection requirements (**Appendix Two**); or meet one of the requirements for having an exception to local connection requirements.

2.14 No priority will be given to applicants on the register who may have reasonable preference but:

- have the financial resources available to meet their housing costs based on a comprehensive financial assessment by an officer. (A change in circumstances will be considered on renewal of the application).
- there is evidence of them, or a member of their household perpetrating unacceptable behaviour serious enough to make them unsuitable to be a social housing tenant, including rent arrears, (A change in circumstances will be considered on renewal of the application).
- have deliberately worsened their circumstances to gain advantage on the register.
- have provided false information or withholding information, which is a criminal offence.
- do not have a local connection to Carmarthenshire, as defined at section 81 of the Housing (Wales) Act 2014, unless they are exempt from the local connection criteria as set out in **Appendix Two**.

Conclusion

2.15 The Council will consider all applications for social housing that are made in accordance with the procedural requirements of this Policy. In considering applications, however, the Council must ascertain if an applicant is eligible for accommodation or whether he or she is excluded from allocation.

- 2.16 For further details about eligibility and exclusion please refer to **Section 3**. It should be noted that the law in relation to eligibility is complex and subject to change.

3. Application and Assessment Process

- 3.1 An application to join the Housing Register is subject to a housing assessment being completed. Whilst the Council will consider all enquiries for help with housing, not all applicants are eligible under this Policy to join the Housing Register (**Section 2**). The application and assessment for social housing under this Allocation Policy is as follows:

Information, advice, and emergency assistance

- 3.2 A team of dedicated Housing Hwb Advisors will discuss individuals housing needs and circumstances and give appropriate information, advice, and assistance.
- 3.3 The initial-assessment interview will allow us to:
- identify the urgency of the need for housing.
 - assess whether an applicant will qualify to join the Housing Register.
 - consider housing options to formulate individual housing plans.
 - identify the applicant's community connection area together with their areas of preference.
 - assess if a member of the household has the financial resources available to meet their housing costs.
 - identify any support required (and refer where necessary).
- 3.4 The team can be contacted by telephone on 01554 899389 or by email via schoptions@carmarthenshire.gov.uk. Following the initial assessment, if we think the applicant may be homeless or threatened with homelessness, applicants will be referred to a Housing Options Advisor. To speak to someone out of hours as an emergency phone 0300 3332222 or email contactus@deltawellbeing.org.uk
- 3.5 The Council uses an online application process, with support made available for our most vulnerable residents and those who are unable to complete this on their own and do not have support to do so.

- 3.6 A full assessment will take place following an initial assessment interview and once we have received all the supporting documents and evidential information to support the application. We will assist our vulnerable residents to do this.
- 3.7 Following the assessment, we will notify applicants of the outcome of the assessment, if they are eligible or not to join the register, and which Band they have been placed in. The Band will be the one that most reflects their housing need. They will have the right to request a review of this decision if they do not agree with the outcome of the assessment.
- 3.8 A joint application will be treated as one application. The housing needs of all members of the household will be considered in assessing an application. We do not accept multiple applications from an applicant, meaning that no individual can have their name on more than one housing application at any one time. All applicants will be provided with a full range of realistic options to resolve their housing need, and which are tailored to their individual circumstances.
- 3.9 It is the responsibility of every applicant to ensure that their application details are correct at the time of registration and are subsequently updated when any circumstances change. Failure to do this may either lead to the application being cancelled, the applicant being placed in the wrong Band, or a subsequent offer of accommodation being withdrawn because application details were incorrect.
- 3.10 Further, section 171 (1) of the Housing Act 1996 states that:
- a person commits an offence if, in connection with the exercise by a local housing authority of their functions under this Part –*
- (a) s/he knowingly or recklessly makes a statement which is false in a material particular, or*
- (b) s/he knowingly withholds information which the authority has reasonably required him to give in connection with the exercise of those functions.*
- 3.11 Applicants will be required to re-register their housing application twice a year to confirm that they still want to be considered for housing. This will be carried out on the 6 and 12-month anniversary of the date of their registration. Applicants will be notified in writing of the arrangements for completing this renewal. Where we have been advised of specific support needs, we will assist applicants to re-register.

- 3.12 Failure to complete the renewal or failure to re-register, log-on and access their accounts, or bid for properties that meet their needs, will mean that applicants will be removed from the Housing Register within the time-period specified. Applicants have the right to appeal removal from the Housing Register by providing the necessary evidence. This can be done by contacting by telephone on 01554 899389 or by email via schoptions@carmarthenshire.gov.uk.

Housing Options Assessment

- 3.13 As part of the housing options assessment, we will determine whether an applicant will qualify to join the Housing Register. We must ensure applicants are eligible to join The Register and rigorous checks are undertaken to ensure only those legally eligible for social housing are registered. We need information which will include formal photo identification (e.g. passport, driving licence) and a National Insurance number. This will help us to make initial checks prior to registration. We will also collect information to help us ensure allocations are made fairly and in line with the Equality Act 2010.
- 3.14 There are some groups of people who cannot by law join the housing register regardless of their housing need or circumstances. They are people subject to immigration control (with some exceptions) and other people from abroad. **(Section 2, paras 2.3 and 2.4).**
- 3.15 The Council is entitled, in accordance with s.160A Housing Act 1996, to restrict access to its housing register to a person:
- if they or a member of their household, has been guilty of unacceptable behaviour serious enough to make them unsuitable to be a tenant of the authority; and in the circumstances at the time their application is considered, they are unsuitable to be a tenant of the authority by reason of that behaviour.
 - where there is evidence of them, or a member of their household perpetrating unacceptable behaviour serious enough to make them unsuitable to be a social housing tenant and would have been found guilty were we to have taken them to court.

When the Council refer to “behaviour” it means anti-social behaviour and other prohibited conduct which comes within section 55 of the Renting Homes (Wales) Act 2016 and the Council is satisfied that an outright possession order would have been made under that section.

- 3.16 Anyone who is 16 or 17 years of age will ordinarily be referred to our Children's Services team or other organisations who work with young vulnerable people. Social services are under a duty to assess the young person's circumstances under the Social Services and Well-being Act 2014. Children's Services and the Housing and Public Protection Division will work jointly to provide the most appropriate supported or temporary accommodation provision available following the outcome of the assessment.

Banding Criteria

- 3.17 Applicants will be placed in a Band depending on their housing need identified through the housing assessment and according to the criteria set out in the Bands.
- 3.18 Under this Policy people who have been assessed under Part 2 of the Housing (Wales) Act 2014 and a section 66, 73, or 75 duty has been accepted; and those with additional preference will be considered eligible to join Band A to ensure that they are given adequate priority for housing.
- 3.19 Under this Policy the Council will maintain a Register of those applicants who are eligible and fall within:

Band A - Urgent Housing Need.

Band B - Housing Need: Reasonable Preference.

Band C - No housing need.

Band D - No priority.

- 3.20 Applicants will also be assessed to see if they need housing related support, and an appropriate referral will be made.
- 3.21 People being assessed as having no housing need (Band C) will have reduced priority on the Housing Register under The Policy, except for those applicants:
- who wish to be considered for sheltered accommodation and accommodation for older people (for over 55s).
 - requiring extra care housing (Housing with care and support).
 - have been assessed as requiring an adapted home.
 - wish to register for Low-Cost Home Ownership (LCHO)).

Applicants in Band C may be offered properties and will be able to bid for properties which have not been taken up by applicants from Bands A and B.

- 3.22 For existing (at the time this policy is introduced) applicants in Band A, in urgent housing need, their Banding will be retained, subject to 3.8 - 3.10 above.
- 3.23 This policy is a mixture of direct offers and choice-based lettings. To meet the needs of its residents in greatest housing need, in the first instance all the Council and RSL vacancies will be considered for direct allocation under this Policy. Only if a property cannot be matched to an applicant will it be advertised on Canfod Cartref - Home Finder.
- 3.24 Social Housing is only allocated to people who have been accepted onto our Housing Register. Once eligibility to join The Housing Register has been confirmed, applicants will be placed in a Band or the “no priority” group as follows:

Band A – Urgent Housing Need

1. Homelessness: Additional Preference

- Applicants who are homeless and are owed a duty under Housing (Wales) Act 2014, s 75.*

2. Homelessness: Reasonable Preference

- Applicants who are homeless and are owed a duty under Housing (Wales) Act 2014, s 73
- Applicants who are threatened with homelessness and are owed a duty under Housing (Wales) Act 2014, s 66*

3. Urgent Housing Need:

Section 167(2) of the 1996 Act gives Local Authorities the power to give additional preference to particular descriptions of people who fall within the reasonable preference categories and who have urgent housing needs.

Under this policy we consider giving **additional preference** to:

- Applicants who need to move due to high risk or life-threatening medical/welfare grounds which will not improve until more suitable accommodation is offered. This will require an assessment based on evidence from an appropriate professional.
- Applicants who need to move to suitable accommodation because of a serious injury, medical condition, or disability which he or she, or a member of their household, has sustained because of service in the Armed Forces.
- Applicants who are currently under-occupying social housing in Carmarthenshire and need to transfer to a smaller property due to the current property being unaffordable and remaining would result in hardship.

The Housing Act 1996 Section 167 gives full detail of situations where applicants should be given additional preference and/or assessed under Part 2 of the Housing (Wales) Act 2014, and we will assess applicants in accordance with this legislation fully.

* Where an applicant is homeless or is owed a duty under s66, s73 or s.75 Housing (Wales) Act 2014 solely because of the presence of a restricted person, the applicant does not have reasonable preference as a result of being homeless or owed a s.75 duty. The applicant will be assessed for any other housing needs or placed in Band C. "Restricted person" means a person— (a) who is not eligible for help under this Chapter, (b) who is subject to immigration control within the meaning of the Asylum and Immigration Act 1996, and (c) who either— (i) does not have leave to enter or remain in the United Kingdom, or 10 (ii) has leave to enter or remain in the United Kingdom subject to a condition to maintain and

Band B – Housing Need: Reasonable Preference

- People who are homeless (within the meaning of Part 2 of the Housing (Wales) Act 2014).
- Applicants who need to move, as their medical/welfare condition will not improve. The assessment is not based on the medical condition alone but how their current accommodation affects their health.
- Applicants who need to move to provide or receive support and care as they cannot carry out day to day activities alone i.e., washing, cleaning, and getting in and out of bed.
- Applicants who are currently under-occupying social housing in Carmarthenshire and want to transfer to a smaller property.
- Applicants who want to move from an adapted home that they no longer require. This would then benefit another household who requires this specialist type of property.
- Applicants occupying insanitary or overcrowded housing or otherwise living in unsatisfactory conditions.
- Applicants who need to move to a particular locality in Carmarthenshire County Council, where failure to meet that need would cause hardship to themselves or others.

Band C – No Housing Need

- Applicants who have no housing need based on the information they submitted on their application.
- Applicants who are entitled to reasonable preference but to whom we have discharged a homelessness duty.

Band D – No Priority

- Applicants we assess to have the financial resources available to meet their housing costs.
- Where there is evidence of applicants, or a member of their household, perpetrating unacceptable behaviour serious enough to make them unsuitable to be a social housing tenant, including rent arrears.
- Applicants deliberately worsening their circumstances to gain advantage on the policy.
- Applicants who have provided false information or withheld information, which is a criminal offence.
- Applicants who do not have a local connection to Carmarthenshire, as defined at section 81 of the Housing (Wales) Act 2014, unless they are exempt from the local connection criteria as set out in Appendix Three.

4. Allocation Process

- 4.1 We are committed to ensuring that our allocations and lettings do not discriminate, and we aim to meet our obligations under the Equality Act 2010. This includes all applicants being able to access the service taking account of any vulnerability or specific needs.

Size, Type and Location of Homes

- 4.2 We will establish where an applicant has a community connection, as well as the size and type of home they need. As far as possible, we will aim to meet their aspirations as well as their needs. Applicants also have the choice of additional areas to bid on when a home is advertised on our choice-based lettings service Canfod Cartref which meets the size and type they need. We will also ask an applicant about areas where they believe they cannot live, for example due to fear of violence, harassment, or domestic abuse.
- 4.3 Giving applicants a choice must be set against our legal responsibilities to discharge our homeless duties into accommodation that the council deems suitable and the high demand for housing in Carmarthenshire. We may not be able to meet every applicant's preference.
- 4.4 **Appendix Four** sets out which size of property applicants will be considered for.

Allocations – Where 'criteria for letting' apply

- 4.5 Under this Policy, the following allocations will have their own criteria for letting. Further detail is provided in **Appendix Five**:
- **New housing developments** where Local Lettings Policies (LLPs) apply.
 - **Traveller sites** – Accommodation needs for traveller families are assessed under section 101 of the Housing (Wales) Act 2014.
 - **Adapted accommodation** – Some homes have been specially adapted to meet people's needs. An Accessible Housing Register (AHR) is operated as part of the main Register (**Appendix Six**).
 - **Shared accommodation** – shared lettings will allow for some self-selection of fellow sharers.
 - **Extra care** – Accommodation provided for people with care and support needs.

Allocations – ‘Exempt’ from direct matching

- 4.6 The Council may, in exceptional circumstances, exercise its discretion to grant a secure or introductory tenancy to applicants outside of the usual banding priorities. That decision will be made by Head of Housing and Public Protection or Housing Hwb Manager. Examples of when the Council may choose to exercise its discretion include (but are not limited to):
- a. Where an applicant has a reasonable preference and where several statutory agencies are involved, and immediate provision of housing will alleviate multi-agency input;
 - b. Where a contract holder has died, and a member of the contract holder’s family occupies the property and has no right to a statutory succession under the Renting Homes (Wales) Act 2016. The Council will consider whether to grant an introductory occupation contract to the occupier of the property or, if the property is more extensive than reasonably required for the occupier’s occupation, of another property.

Grants of secure or introductory occupation contracts that are not an allocation

- 4.7 There are various grants of occupation contracts which do not fall within the allocation scheme. These are set out in **Appendix Three**. In the interests of transparency, we will record and report such allocations quarterly to the Strategic Housing Partnership Board. These allocations will require approval from a senior manager of the respective organisation.
- 4.8 Such allocations include those mentioned in S160 of The Housing Act 1996 and the Renting Homes (Wales) Act 2016 which are listed in **Appendix Three**.
- 4.9 There are occasions when the grant of an occupation contract would constitute an allocation, but there are specific circumstances for it to be granted exceptionally and not within the current Banding/direct offer/choice-based lettings structure of the scheme.

Direct Allocations

4.10 This policy is a mixture of direct offers and choice-based lettings. To meet the needs of its residents in greatest housing need, in the first instance all the Council and RSL vacancies will be considered for direct allocation under this Policy for applicants in Band A, B and C and who have a Local Connection (see **Appendix Two**)

4.11 When selecting applicants for direct allocations we will consider in Band order (A, B and C). Within each band the following prioritisation factors will be followed.

Prioritisation Factors	Criteria	Process
First	Community Connection Criteria	We will sort by Community Connection area. Only people with a community connection will be considered in the first instance (unless they are exempt). If there are no applicants with a community connection, we may consider other applicants who have expressed a preference to live in that community
Second	Time on register	Based on the time spent in the priority band. Offers will be made in duty and date order
Third	Identified support Needs	Applicants who do not need support, or applicants who can be supported to live in settled accommodation will be considered. (Appendix Seven)
Fourth	Sustainable Communities	To support a sustainable tenancy, we will consider the impact of any eligible applicant on the wider community before making the nomination

4.12 Where we are unable to directly match an available home to people in Bands A to C, we will advertise those properties on Canfod Cartref – any applicants on the Housing Register can continue to bid for these homes. When selecting applicants for advertised homes, the offer is made according to the criteria set out above.

5. Offer of Accommodation

- 5.1 The offer is made in line with the prioritisation criteria set out in section 4.11.
- 5.2 Once an applicant has been identified for a property, we will carry out a further verification of their eligibility and priority to ensure all information is accurate and correct before a formal offer is made. An offer will not be made if;
- since joining the register an applicant has become ineligible.
 - the priority band was found to have been incorrectly awarded due to the information provided by the applicant.
 - circumstances have changed since the Priority Band was awarded and the applicant is no longer entitled to the same level of priority.
- 5.3 We will verify all applicants' details and request proof in certain circumstances to confirm the information given is correct. Failure to provide the required information may mean we will withdraw the offer.
- 5.4 It is the applicant's responsibility to keep us up to date of any changes to their housing needs or household make up. It is critical that we have accurate contact details. If the applicant fails to respond to our contact, we will bypass them for the nomination and may remove them from the Housing Register.
- 5.5 It is an offence to give a false statement or to withhold information in connection with making a housing application. Where there is evidence of such an offence, we will initiate legal proceedings against the applicant and take steps to end any contract gained fraudulently.

Reasons why an RSL may refuse a nomination

- 5.6 It is important to note that RSLs also carry out their own verification processes and they may refuse to accept an applicant as a contract holder if they do not meet the guidelines set out in their own policies. This would include applicants who owe a rent debt but who have been allowed onto the Register.
- 5.7 RSLs will also carry out an affordability check when allocating properties to ensure that applicants are able to afford the rent for the property.
- 5.8 If, for any reason, the RSL is considering refusing an applicant for a property they will contact the applicant to let them know and the applicant will be

given an opportunity to request a review of the decision. If the Council do not agree with the decision of the RSL, we will negotiate with them, but we may have to move on to another nomination if that negotiation is unsuccessful.

- 5.9 RSLs may also prevent an offer going ahead where the property is not considered to be suitable for an applicant. This may include issues of public safety, risk, or sustainability of the contract. An offer may not be made or may even be withdrawn if an applicant's support needs are such that the housing provider, in consultation with the Council, deems that the applicant will be unable to maintain an independent contract. This decision may also be informed by the input from other partner agencies involved in a case. In these circumstances there must be a sufficient care, or support, package available to ensure the contract is likely to be successfully maintained.

Suitable Offers

- 5.10 Applicants in Band A will be offered a suitable offer (Part 6 Housing Act 1996). Applicants to whom we owe a Housing Duty will be given one suitable offer to discharge our Homelessness Duty; all other applicants will be given two suitable offers. See **Appendix Eight** for an explanatory flow-chart.
- 5.11 Where an applicant has been made an offer of the size and type they need, we shall set out the offer, the consequences of not accepting the offer and their right of review if they refuse the offer in line with Housing (Wales) Act 2014.
- 5.12 If the applicant does not consider the offer to be suitable, refuses the offer and submits a request for a review, the property shall be re-allocated in-line with the prioritisation criteria in point 4.11. Should the review be upheld the applicant will be offered a further 'suitable offer'.
- 5.13 Should the review not be upheld; the applicant will be removed from the eligibility Band A and reassessed. This may also result in the ending of their homelessness duty.
- 5.14 We may make a suitable offer to applicants in Band A who we do not owe a Homelessness Duty to. Where an applicant has been offered a home of the size and type they need, we shall make up to two offers setting out the offer, the consequences of not accepting the offer, and their right of review if they refuse the offer.

- 5.15 If the applicant does not consider the second offer to be suitable, refuses the offer and submits a request for a review, the second property shall be re-allocated in-line with the prioritisation criteria above. Should the review be upheld the applicant will be offered a further 'suitable offer'.
- 5.16 Should the review not be upheld the applicant will no longer be in Band A and will be reassessed.
- 5.17 Where an eligible applicant is 18-35, the offer of a shared tenancy will normally be considered a suitable offer as this is consistent with the offer of accommodation in the private rented sector and the level of help applicants get with all or part of their rent. This will be the case unless the applicant can demonstrate affordability of a 1-bedroom home or provide evidence from an appropriate professional that shared housing would not be an appropriate offer.

The Review Process

- 5.18 The applicant has the right to review any of the following decisions:
- The applicant disagrees with the decision not to place them in the Urgent Housing Need Band.
 - The applicant considers that a decision has been reached based on incorrect information.
 - The applicant has been treated as ineligible based on their immigration status.
 - The applicant has been treated as ineligible to join the register due to unacceptable behaviour.
 - The applicant disagrees with a suitable offer of accommodation.
- 5.19 Applicants must request a review of a decision within 21 days of being notified in writing of the decision. They must give reasons why they wish to have the decision reviewed, including where they believe an incorrect decision has been made.
- 5.20 The applicant has a right to representation as part of the review. Examples of who may make representation include family members, support workers, social workers, or local members.
- 5.21 The review will be carried out by a senior officer of the Council. The reviewing officer will not have been involved in making the original decision.

5.22 The applicant should normally be notified of the outcome of the review within 8 weeks of the review request.

6. Governance Arrangements

Councillors, RSL Board members, staff, and their relatives

- 6.1 The primary role of our Councillors (as outlined in statutory guidance) is to undertake a strategic role of deciding the allocations policy and to hold officers of the authority to account for their decisions under it.
- 6.2 Councillors cannot be involved in assessing housing applications or the allocation of housing. However, this does not prevent them from seeking or providing information on behalf of their constituents with the applicant(s) consent. Councillors will be consulted on Local lettings Policies and informed of any voids in their ward.
- 6.3 Officers of the authority and RSLs are responsible for applying this Policy and allocating according to its rules. To ensure that we are treating all applicants fairly, any application for housing from Councillors, employees of Partners, Board members, or associated persons must be disclosed. Canvassing is not allowed.
- 6.4 These applications will be assessed in the normal way, but any allocation of housing must be approved by the Head of Housing and Public Protection. For RSLs, they must also have the allocation approved at Board level and make the Welsh Government aware of the allocation.

Publicising the policy

- 6.5 We will publish this Policy and make it freely available. We will provide a copy free of charge to anyone who requests one as well as making it available online and via our partners. Advice on this policy is available through the Housing Options and Advice Team on 01554 899389 or email schoptions@carmarthenshire.gov.uk

Reviewing the policy

- 6.6 This Policy has been produced in agreement with participating RSLs. We will notify those it may affect in writing, and within a reasonable period, of the changes in this Policy. Regular reviews of the Policy will be carried out, and any subsequent changes, will require further Cabinet approval.

Appendix One – Section 55 of the Renting Homes (Wales) Act 2016

Section 55 Anti-social behaviour and other prohibited conduct

(1) The contract-holder under an occupation contract must not engage or threaten to engage in conduct capable of causing nuisance or annoyance to a person with a right (of whatever description)—

(a) to live in the dwelling subject to the occupation contract, or

(b) to live in a dwelling or other accommodation in the locality of the dwelling subject to the occupation contract.

(2) The contract-holder must not engage or threaten to engage in conduct capable of causing nuisance or annoyance to a person engaged in lawful activity—

(a) in the dwelling subject to the occupation contract, or

(b) in the locality of that dwelling.

(3) The contract-holder must not engage or threaten to engage in conduct—

(a) capable of causing nuisance or annoyance to—

(i) the landlord under the occupation contract, or

(ii) a person (whether or not employed by the landlord) acting in connection with the exercise of the landlord's housing management functions, and

(b) that is directly or indirectly related to or affects the landlord's housing management functions.

(4) The contract-holder may not use or threaten to use the dwelling subject to the occupation contract, including any common parts and any other part of a building comprising the dwelling, for criminal purposes.

(5) The contract-holder must not, by any act or omission—

(a) allow, incite, or encourage any person who is living in or visiting the dwelling to act as mentioned in subsections (1) to (3), or

(b) allow, incite, or encourage any person to act as mentioned in subsection (4).

(6) This section is a fundamental provision which is incorporated as a term of all occupation contracts; section 20 provides that this section—

(a) must be incorporated, and

(b) must not be incorporated with modifications.

Appendix Two – Local Connection and Community Connection definition and areas

We have two connection factors used when prioritising an allocation, which relate to applicant's requirement for that specific vacant property.

Local connection – the applicant has a connection to the County of Carmarthenshire.

Community connection – the applicant has a connection to the community area where the property is situated.

Local Connection to Carmarthenshire

Local Connection is defined in Section 81 of the Housing (Wales) Act 2014.

A person has a local connection with the area because:

- the person is, or in the past was, normally resident there, and the residence is or was of the person's own choice.
- the person is employed there.
- of family associations.
- of special circumstances.
- they were placed in Home Office accommodation pursuant to s.95 Immigration and Asylum Act 1999 (accommodation for asylum seekers) in the local housing authority's district, and that was their most recent placement.

Applicants who do not have a local connection with Carmarthenshire or who do not fall under 'special circumstances' or meet one of the requirements for having an exception to local connection requirements will be given lowest priority on the scheme.

Community Connection to an Area

Community Connection to an area within the county will usually be the area where an applicant currently lives. However, it can also apply to an area where they lived previously, have family living, work closely to, or have children in school close by. Applicants can select one area where they wish Community Connection to apply considering the following criteria.

- Applicants who have lived in the community area for a continuous period.
- Applicants who are working in the community area.
- Applicants who have previously lived in the community area for a continuous period but have had to move out of the area to access accommodation; and/ or

have a close relative who has resided in the area, and it has been assessed they need to continue to live in the area to provide essential support.

- Serving members of the Regular Forces who have a community connection to the area (e.g., previously lived here/ close relatives currently living here).

If an applicant can demonstrate any other reason that they have a connection with a different community area, then we will offer flexibility to register them for that area. An example of flexibility is where the applicant is living near the boundary of a community connection area.

If an applicant can demonstrate a reason why they should NOT be considered to have a community connection to a particular area, we will offer flexibility to register them for a different area.

Community Connection Areas

Applicants will be classified as having a community connection to the following area

Grouped Community Connection Areas		
<u>Llanelli Town</u>	<u>Ammanford</u>	<u>Carmarthen</u>
Elli	Ammanford	Carmarthen Town North and South
Bigyn	Betws	Llangunnor
Glanymor	Penygroes	Abergwili
Tyisha	Saron	Carmarthen Town West
	Llandybie	
<u>Llanelli East</u>	Tycroes	<u>Rural North West</u>
Hendy		Cenarth and Llangeler
Llangennech		Cynwyl Elfed
Bynea	<u>Amman Valley</u>	
Llwynhendy	Garnant	<u>Rural North East</u>
	Glanamman	Llanybydder
<u>Llanelli West</u>	Cwarter Bach	Llanfihangel ar-Arth
Pembrey		
Burry Port	<u>Gwendraeth</u>	
Hengoed	Gorslas	<u>Rural West</u>
	Glyn	Laugharne Township
<u>Llanelli Rural</u>	Llannon	Trelech
Llangyndeyrn	Pontyberem	Llanboidy
Trimsaran		St Clears and Llansteffan
Kidwelly and St Ishmael		Whitland
	<u>Rural Central</u>	
<u>Llanelli North</u>	Llanddarog	<u>Llandovery/Llandeilo</u>
Swiss Valley	Llanegwad	Llandovery
Dafen and Felinfoel	Llanfihangel Aberbythych	Llandeilo
Lliedi		Manordeilo and Salem
Hengoed		Cilycwm
		Llangadog

groupings:

These 'community connection area' groups are designed to give applicants choice over a wider area than just a single village or town. This helps balance need against areas with little or no social housing.

If there are no applicants with a community connection, we may consider other applicants who have expressed a preference to live in that community.

Appendix Three - Allocations – ‘Exempt’ from direct matching

The following grants of secure or introductory occupation contracts do not fall within the definition of an allocation and do not form part of the allocation scheme:

1. Where an existing secure or introductory contract holder has been provided with alternative accommodation, for repairs or improvements to their home to be carried or has been moved as part of a regeneration scheme and the contract holder has chosen to remain in the alternative accommodation after the works have been completed.
2. Where there are significant operation or management issues requiring an urgent and permanent move.
3. Where a contract holder dies and succession of the contract to members of their household applies under Renting Homes (Wales) Act 2016 and the home they have gained succession of is bigger than they reasonably need, they may be offered suitable alternative accommodation
4. Where a contract holder dies and the succession of the contract to members of their household applies under Renting Homes (Wales) Act 2016 and the property is an adapted property which the occupiers of the property no longer need, they may be offered suitable alternative accommodation
5. Where there is a duty to rehouse occupiers following compulsory purchase or acquisition of a defective dwelling-house
6. Where an existing contract holder is given a new occupation contract in respect of a different dwelling for housing management reasons (for example, to prevent under-occupation or overcrowding or to resolve an antisocial behaviour matter)
7. The provision of suitable alternative accommodation where possession of a dwelling is sought or obtained (or could be sought or obtained) on estate management under Renting Homes (Wales) Act 2016
8. Where the Council is ordered to provide suitable alternative accommodation by a court or tribunal, or agrees to provide suitable alternative accommodation to settle or avoid legal proceedings
9. Where a person succeeds to a secure occupation contract under s.73 (succession death), s 78 (more than one qualified successor) or s 80 (substitute succession on early termination) of the Renting Homes (Wales) Act 2016
10. A secure contract is transferred to a potential successor under s.114 Renting Homes (Wales) Act 2016
11. A secure contract is transferred to another secure contract-holder under s.118 Renting Homes (Wales) Act 2016

12. Where an occupation contract vests in or is otherwise disposed of pursuant to an order listed in s.160(30A) (d) HA 199618
13. Where an introductory standard contract becomes a secure occupation contract under s.16 Renting Homes (Wales) Act 199619
14. Where a prohibited conduct standard contract becomes a secure occupation contract under s.117 Renting Homes (Wales) Act 1996

Appendix Four – Location, type, and size of property

Properties will be allocated which are appropriate to the size of the household. However, in some areas we may not have the size of home to meet exact needs.

To ensure we can maximise the use of the stock, following an assessment, an offer of a property may be made which is smaller or larger than would normally be made. We will ensure individual assessments are completed for applicants whose household does not fit within the standards in the table before making the offer.

Household	Size	Property Type
Single people and/or couples	1 bed	Bedsit, shared house/flat, 1 bedroom flat
Single people or couples 55 and over	1 bed	Bedsit, 1 bedroom flat 1 or 2 bed bungalows and sheltered housing
Household expecting their first baby (and in receipt of the MATB1 certificate)	2 beds	2-bedroom flats, maisonettes, and houses
Household with one child*	2 beds	2-bedroom flats, maisonettes, and houses
Household with two children of same sex aged under 16 years	2 beds	2-bedroom flats, maisonettes, and houses
Household with two children of opposite sex where one is over 10 years	3 beds	3-bedroom house
Household with three or four children	3 beds	3 - or 4-bedroom houses (if available as limited stock of this size, and dependant on age and sex of children)
Household with five or more children	4 beds	4 - or 5-bedroom houses (if available as limited stock of this size, and dependant on age and sex of children)

** Households with children – this means a person in receipt of child benefit. We do not consider a requirement to provide a secondary home. The household size requirement for pregnant applicants with children will need to be considered based on the ages of the children and if they would be able to share with the expected child.*

There are exceptions to this which are outlined as follows:

Older people's housing or 'Sheltered Housing' is normally reserved for those aged 55 years plus. This may vary in Extra Care Accommodation where the criteria may be based on care and health needs. For Council Schemes, an assessment will be carried out by a Sheltered Scheme Officer. To be considered, people will normally:

- Be over 55, (although some schemes may have a higher minimum age requirement)
- Be able to evacuate the building by themselves in the event of a fire (for Council-owned complexes)

The same priority arrangements are then applied.

Bungalows will normally be allocated to households with a family member over the age of 55. If there are no applicants who meet these criteria, people with disabilities and people with special housing requirements will be considered taking account of their circumstances.

Adapted properties will be allocated where a member of the household has been assessed by an Occupational Therapist and where it has been determined they require adaptations.

Extra Care – These are specialist facilities for applicants who require support and care. The assessment will be made based on the Extra Care facilities criteria.

Appendix Five– Criteria for Letting

<p>Local Lettings Policies (LLPs)</p>	<p>In some circumstances, particular areas may have a formally agreed local lettings policy. A local lettings policy would be in place to make sure that homes in that area are given in a way that helps to tackle issues. To agree a local letting policy it should be based on the following test:</p> <p>Clear definition of what is to be achieved by the local lettings policy.</p> <p>Clear evidence to back up the need of the local lettings policy.</p> <p>Any potential equality impact has been considered; how long the local lettings policy is to be operational and when the local lettings policy is to be reviewed.</p> <p>A local lettings policy must be approved by the Cabinet Member for Homes (Council) and the Housing Association board for RSL LLPs before it can be put into place. It must have partnership approval to ensure any adverse unintended impact on other partner landlords are mitigated and the review period agreed.</p> <p>An example is, when looking at new housing developments, a local lettings plan is required to ensure a sustainable community cohesion is sought.</p> <p>The Cabinet Member for Homes would need final sign off following partnership approval.</p>
<p>Sensitive Lettings (individual properties)</p>	<p>An individual property may be a ‘sensitive let’. This could be where there is a confirmed history of antisocial behaviour or criminal activity at that property or in close vicinity.</p> <p>A property will only be designated a sensitive let with the approval of the Head of Housing (Council) or by a manager of equal seniority (Housing Association). If a property is a sensitive let, certain households will not be considered for that property.</p>

	<p>Once the property has been let it will no longer be classed as a sensitive let. Letting in this way should be as an exception and not the rule.</p> <p>It must have partnership approval to ensure any adverse unintended impact on other partner landlords are mitigated and the review period agreed.</p>
Traveller sites	<p>Accommodation needs for traveller families are assessed under section 101 of the Housing (Wales) Act 2014. If the assessment identifies needs within the area with respect of the provision of sites on which mobile homes may be stationed the Council must exercise its powers in section 56 of the Mobile Homes Wales Act 2013.</p> <p>Regard has been given to the Welsh Government's publication, "Travelling to a better future" and its guidance on Managing Gypsy and Traveller Sites. The process for allocating a pitch would still be based on priority, local connection, community connection and time waiting if there were 2 or more interested applicants.</p>
Adapted Accommodation	<p>Some homes have been specially adapted to meet people's needs. This type of accommodation includes homes for people with disabilities and people with special housing requirements.</p> <p>To ensure we match people to adapted homes and make the best use of the accommodation we have available, an Accessible Housing Register (AHR) is also operated as part of the main register.</p> <p>Specific housing needs are identified and assessed as part of the initial housing enquiry. As part of this process an assessment may be undertaken by an occupational therapist. The result of this assessment will dictate the level of need and the type of adapted property required.</p> <p>The Allocation of Adapted Accommodation can be found in Appendix six.</p>
Shared accommodation	<p>Shared lettings may be allocated outside of the policy to allow the ability for some self-selection of fellow sharers to ensure sustainability of the tenancy. A local letting plan should be developed before allocation.</p>

Appendix Six – The Accessible Housing Register Lettings Policy

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An effective accessible housing register will have the following elements:

1. Specialist staff or staff who are trained and have a level of expertise in relation to the access requirements of disabled people, in particular: disability equality training and inclusive design.
2. Open and easily accessible to apply.
3. Housing advice and information for applicants in relation to the availability of accessible housing and guidance on areas of choice.
4. Clear and transparent policies, procedures, and guidance covering the following areas:
 - ✓ matching people and properties.
 - ✓ application, including process and criteria.
 - ✓ assessment and classification of need (housing, adaptation, and access).
 - ✓ applicant prioritisation (preference), managing waiting lists, homelessness referrals, etc..
 - ✓ managing and reviewing waiting lists.
 - ✓ assessment of property (access and adaptations).
 - ✓ classification of property (coding to denote accessibility level and adaptations).
5. Clear standards, monitoring and review processes for: applicants' waiting times (segmented into process e.g., application, assessment, waiting for a home).
 - ✓ void times.
 - ✓ Allocations.
 - ✓ complaints and appeals.
 - ✓ satisfaction (customer).

Taken from "Housing and disabled people - A toolkit for local authorities in Wales"

1.0 Introduction

- 1.1 Being able to access suitable housing is one of the main problems facing many disabled people. Though not a legal requirement, Carmarthenshire County Council has compiled an Accessible Housing Register (AHR) which assists disabled people to find suitably adapted accommodation by:
 - identifying disabled people in need of accessible homes.
 - identifying suitable properties by location and type.
 - matching the person with a suitable property.
- 1.2 This Lettings Policy outlines how we assess both the application and how we allocate our homes fairly and quickly, to ensure that we are making best match of available homes to those who would benefit from the most.
- 1.3 Carmarthenshire County Council operates a Common Housing Register with our Housing Association Partners, Bro Myrddin Housing Association, Caredig Housing Association, Pobl Housing Association, Wales and West Housing Association and Stori Cymru.
- 1.4 A Lettings Policy is being used as an adjustment to our main Allocations Policy where specific criteria will apply. This enables us to make the best possible use of the adapted properties in Carmarthenshire, as well as significantly improve and streamline the process of applying for adapted accommodation. The number of homes allocated is in proportion to the overall number of allocations which are allocated under the Social Housing Allocations Policy.
- 1.5 The AHR is a central register within Carmarthenshire for disabled people who require a high level of adaptations in their accommodation.
 - Adapted properties are allocated where a member of the household has been assessed by an Occupational Therapist and it has been determined that they require specific adaptations to meet their identified needs.
 - Applicants can be placed on the AHR where a specialist officer has identified that the adaptations cannot be practicably achieved in their existing home.

2.0 Application and Eligibility

- 2.1 To be considered for the AHR applicants will need to first apply to Carmarthenshire County Council's Housing Hwb to be accepted on the housing register. The team can be contacted by telephone on **01554 899389** or by email via schoptions@carmarthenshire.gov.uk
- 2.2 The Council uses an online application process, with support being made available for our most vulnerable residents and those who are unable to complete this on their own and do not have support to do so. Applications can be registered by the applicant, a family member, Social Worker, or Support Worker provided they have consent to act on behalf of the applicant.
- 2.3 Applicants will be provided with details of how to apply and update their application online at www.canfodcartref.org.uk.
- 2.4 Applications will be assessed based upon the information provided and placed into the following banding in line with the overarching Common Allocations Policy:

Band A – Urgent Housing Need
Band B – Housing Need
Band C - those with no housing need
Band D – No priority

3.0 Assessment and classification of need

- 3.1 If you also have an assessed care need by social services and you require a care package from Carmarthenshire County Council, this will also be noted.
- 3.2 As part of your application to go on the AHR, you will need to have a functional assessment by an Occupational Therapist. This will help us determine whether you are suitable for the AHR.
- 3.3 If appropriate an alternative accommodation form will be completed following assessment detailing the identified needs of the applicant.
- 3.3 If, following the assessment, you are eligible you will be placed on the AHR. If you are not eligible, we will advise you of other housing options available to you.

4.0 Applicant Prioritisation

4.1 To meet the needs of its residents in greatest housing need, all the Council and RSL vacancies will be considered for direct allocation under this Policy.

4.2 We will prioritise applicants in accordance with the following prioritising factors:

Prioritisation Factors	Criteria	Process
First	Emergency Delayed Transfer of Care (DTCOC)	Applicants will only be considered if there are commissioned care hours available or support available to sustain the tenancy.
Second	Duty or the priority band	Band A within the following prioritization factors first (then Band B etc)
Third	Community Connection Criteria	People with a community connection will be considered in the first instance (unless they are exempt). If there are no applicants with a community connection, we may consider other applicants who have expressed a preference to live in that community
Fourth	Time on register	Based on the time spent in the priority band. Offers will be made in duty and date order
Fifth	Sustainable Communities	To support a sustainable tenancy, we will consider the impact of any eligible applicant on the wider scheme before making the nomination

4.3 Where we are unable to identify a suitable applicant, the property will be passed back for allocation via the Common Housing Register where we will directly match applicants in Bands A or B who may require level access or low-level adaptations. When selecting applicants, the offer is made to the highest banded applicant (with local connection, community connection and time waiting used to help us to shortlist between people in the same Band).

5.0 Offer and assessment of accommodation

5.1 The offer of accommodation will be made in-line with the overarching Allocations Policy. Where an applicant has been offered a home of the size and type, they need, we shall normally make up to two offers setting out the offer, the consequences of not accepting the offer, and their right of review if they refuse the offer.

5.2 In addition to the above (5.1), the initial offer of the property will be made following a desktop assessment by specialist officers, to identify the most suitable applicant based on the compatibility of the property in relation to the identified needs of the applicant.

5.3 A formal offer will be made following a suitability assessment by a specialist officer where the applicant and or equipment used will need to be present.

5.4 Any additional adaptations identified following suitability viewing will be commissioned prior to the commencement of the tenancy.

6.0 Review Process

- 1 The offer of accommodation will be made in-line with the overarching Allocations Policy. The applicant has the right to review any of the following decisions:
 - The applicant disagrees with the decision not to place them in the Emergency Band.
 - The applicant considers that a decision has been reached based on incorrect information.
 - The applicant has been treated as ineligible based on their immigration status.
 - The applicant has been treated as ineligible to join the register due to unacceptable behaviour.
 - The applicant disagrees with a Reasonable or Suitable Offer of accommodation.
- 6.2 Applicants must request a review of a decision within 21 days of being notified in writing of the decision. They must give reasons why they wish to have the decision reviewed including where they believe an incorrect decision has been made.
- 6.3 The applicant has a right to representation as part of the review. Examples of who may make representation include family members, support workers, social workers, or local members.
- 6.4 The review will be carried out by a senior officer of the Council. The reviewing officer will not have been involved in making the original decision.
- 6.5 The applicant should normally be notified of the outcome of the review within 8 weeks of the review request.

7.0 Classification of property

- 7.1 An adapted property can be a house, bungalow or flat that has a combination of the following: -
- A level access or wet room shower.
 - A bedroom extension on the ground floor.
 - A specialist wash / dry toilet.
 - A wheelchair accessible kitchen.
 - A through floor lift.
 - A ceiling track hoist.
 - A stairlift.
 - Widened doorways for wheelchair access.
 - Wheelchair accessible .
- 7.2 Not all needs can be met within the existing housing stock. There are instances where a level access property has been identified by a specialist officer that could be adapted following relevant assessments.

8.0 Managing and reviewing the AHR

- 8.1 We will review the Lettings Policy annually, unless there is change of procedure to make sure that it is still operating effectively and that it is still needed.

Appendix Seven – Identified Support Needs

- **Low Needs** – People who have no or very low support requirements and who can be supported into settled accommodation with either a low level of support or potentially just signposting.
- **Medium Needs** – People who will require a Rapid Rehousing service with temporary floating support. May also require support from other professional services to live independently in settled accommodation.
- **High Needs** – People who have persistent complex needs and/or a history of repeat rough sleeping and who should be offered, as a default, a form of intensive housing-led support such as Housing First.
- **Intensive Needs** (*potentially 24/7 support requirements*) - People who are unable to live independently, perhaps due to concerns around risk to self or others or perhaps even choice. Our expectations would be that professionals are engaged from a health and social care sectors to ensure their care and support is fit for purpose. Where someone is identified as falling into the intensive needs category, moving into settled accommodation must continue to be the objective.

Taken from “Rapid Rehousing Transition Plans: Guidance for Local Authorities and Partners Developing a Rapid Rehousing Transition Plan 2022 to 2027 October 2021”

Appendix Eight -Suitable Offer Flowchart

