



# BIELD ALLOCATION POLICY REVIEW

Consultation Report October 2023

## ABSTRACT

*Bield Housing and Care conducted a consultation on its Allocation Policy during August 2023. Feedback covered areas such as sensitive lets, verification process, information about veterans, approaches to domestic abuse, approach to equality, and priority need groups. The majority supported the updates, emphasising clarity and inclusivity, identified areas needing clarification and will shape the final policy, ensuring compliance with the Housing (Scotland) Act 2014*

**Zhan McIntyre**

Head of Policy and Customer Standards

## Foreword

Bield Housing and Care embarked on a comprehensive consultation process to refine and potentially redefine our housing allocation policy. This initiative was underpinned by the drive to ensure a more responsive, inclusive, and adaptive allocation system, one that could adequately address the diverse needs of our community.

Over a series of consultations, we touched on various key areas: from proposals surrounding priority groups, management discretion, and medical assessments, to more specific issues such as sensitive lets, ASB evidence requirements, and accommodations for veterans and those with cognitive vulnerabilities.

The feedback was insightful and encompassed a wide array of opinions. A notable majority of stakeholders expressed agreement with our proposed updates, emphasizing the need for more inclusive terminologies, a thorough verification process, and a dedicated approach towards addressing concerns such as domestic abuse and harassment.

There was a unanimous call for transparency, fairness, and the establishment of clear guidelines in our decision-making processes.

However, the consultation also brought forth areas requiring clarification, particularly in terms used, and showed the importance of ensuring every stakeholder understood our processes and terms.

We are committed to integrating this feedback into our final policy document. As we proceed, our priority remains ensuring that our allocation policy is in line with the best interests of all our stakeholders and is compliant with the Housing (Scotland) Act 2014. We also pledge to be transparent in our actions, promising to publish the report stemming from this consultation.

In conclusion, this consultation has been instrumental in guiding our next steps, ensuring Bield Housing and Care remains adaptive and attentive to the needs of its community.

**Tracey Howatt | Director of Customer Experience**

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## Introduction

Bield Housing & Care has a range of policies that set out our overall approach to providing services for our tenants and residents.

Our Allocation Policy explains how we manage our stock, let our houses and meet our legal obligations as a social landlord.

Our Allocation Policy was last reviewed in 2019, so we already take full account of changes brought about by the Housing (Scotland) Act 2014.

Driving the full review of the Policy were two key things:

- **Withdrawal from Partnership** - our withdrawal from the partnership with Hanover Scotland and Trust Housing Association
- **Withdrawal from online platform** – our withdrawal from the Homes For You Allocations Platform.

## **Legal background**

The Housing (Scotland) Act 2014 outlines the legal duty for all social landlords to set out how they prioritise the allocation of houses, transfers and exchanges and to publish these rules in an allocation policy.

The Act states that social landlords are legally required to consult with the following service users when they review their allocation policies:

- ✓ Applicants on their housing list
- ✓ Tenants
- ✓ Registered Tenant Organisations
- ✓ Other Stakeholders

## Overview of consultation

Audience	Method	Aim
Tenants	Newsletter Article directly to all tenants Summer edition Winter edition	To provide information regarding the consultation process and advise of the proposed changes.
Applicants	Applicants were advised through the review letters which were sent to applicants as part of current practice, as well as an accelerated review in order to prepare for the transition.	To provide information and opportunity to feedback on proposed changes.
Stakeholders eg local authorities, charities and representative groups	Emails were sent to local authority partners	To provide information and opportunity to feedback on proposed changes
Partnership Forum	Individual Meetings	Discussion about proposal for change & opportunity for comment on the key policy changes
Communication Champions	Individual Meetings	Discussion about key messages and how to communicate
Equality Network	Individual Meetings	Discussion about equality impact assessment and how to maximise

Audience	Method	Aim
		impact for tenants with protected characteristics
Interested Parties List	Letter and workbook	To gain views from those on the Interested Parties list on the proposals.
General Public	Social Media	Facebook & Twitter feeds highlighting consultation
	Dedicated email address	Use of <a href="mailto:feedback@bield.co.uk">feedback@bield.co.uk</a> to provide direct feedback
	Updated Website	Information published on the proposed changes, together with downloadable questionnaire seeking feedback.

## Consultation Timeline Overview

**April** A newsletter article was sent to all our tenants to highlight that the allocation policy was being reviewed and inviting tenants to get involved.

**May** Early proposals were shared with Area Housing Managers for discussion.

**June** Early proposals were sent to our **interested parties list** for feedback. We received eight responses from this engagement. This feedback influenced the language we used in our wider consultation.

Early proposals were shared with Local Managers Meeting

**July** Communication methods were discussed with our Communication Champions, to help influence how to communicate with tenants about the consultation.

**August** Proposals were taken to the Partnership Forum for discussion.

A survey was shared with staff, tenants and stakeholders, giving an opportunity to provide feedback.



## Questionnaire and feedback

### **Survey overview**

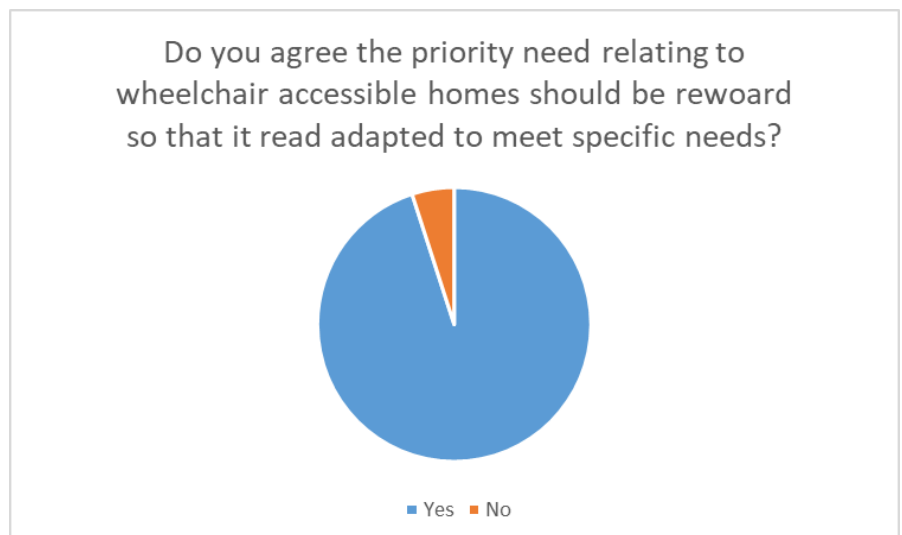
The survey was designed to address the key changes proposed in the updated draft policy. The structure was straightforward: we asked respondents whether they agreed with the proposal, if they had concerns, and provided additional comments.

### **Priority Groups Feedback**

Our initial proposal was to retain the broad existing priority groups, specifically

- Households Experiencing homelessness
- Households in social housing under occupying
- Households in social housing over occupying
- Households that need an adaptation
- Households that have an adaptation that they don't need

From 27 total respondents regarding this proposal, 24 voted 'yes' for retaining the broad existing priority groups while 3 voted 'no', indicating a significant majority in favour.



### **Rewording priority need groups**

The survey also explored potential rephrasing of the last two housing categories. Rather than specifically mentioning "wheelchair accessible houses", we proposed the term "houses that are adapted to meet specific needs."

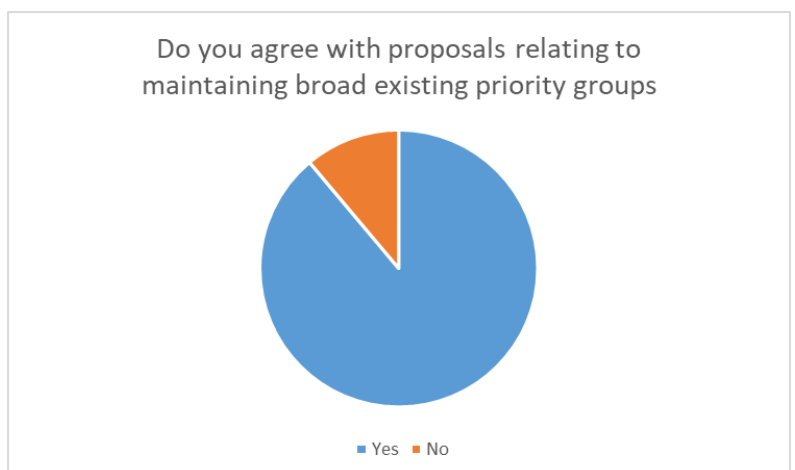
The breakdown of the responses regarding this proposed change was 38 for 'yes' and 2 for 'no'.

Out of 40 respondents for this question, 95% of respondents are in favour of the rewording, and only two had concerns. The substantial support for the proposed terminology highlights its perception as more inclusive, effectively capturing the diverse housing adaptations needed beyond just wheelchair accessibility.

### **General feedback and observations**

After these main points, respondents were given the opportunity to share further insights. A summarised representation of this feedback is presented in Table 1.

Notably, while accessibility remains a pivotal concern for many, factors such as age considerations, specific individual needs, and the broader tenant experience were also highlighted. This underscores the necessity of a holist approach to policy formation to cater to the diverse needs of our tenants.



*Table 1 Comments relating to rewording housing adapted for specific needs*

<b>Topic</b>	<b>Issue</b>	<b>Response</b>
<b>Concerns on Home Ownership and Clientele</b>	<p>One respondent voiced concerns about providing homes to individuals who already own houses, especially given the current homelessness situation.</p> <p>Another comment emphasised that allocations should be for those with specific needs and be of a certain age. The respondent expressed concerns about younger tenants without any apparent needs, which in their view, makes the management more challenging.</p>	<p>We normally have an age associated with applications, unless we have a particular issue with letting, when we can lower the age eligibility.</p>
<b>Accessibility and Adaptations</b>	<p>Some respondents felt that applicants requiring wheelchair accessibility should be given priority over other specific needs.</p> <p>There was a suggestion that applicants in overcrowded or intolerable conditions should have lower priority compared to those needing wheelchair-accessible homes.</p>	<p>Wheelchair accessibility is important, and we will continue to improve our systems to identify wheelchair accessible homes to ensure they are matched to wheelchair users where possible.</p>

Topic	Issue	Response
	<p>A distinction was made between "wheelchair access" and "houses that are adapted to meet specific needs." The respondent felt that some applicants may more closely identify with the term "wheelchair access."</p> <p>The importance of ensuring accommodation suits the needs of the applicant was highlighted, with a call for verification of all medical conditions.</p>	<p>People living in overcrowded or intolerable conditions are mandated priority need groups. However, their points will vary depending on their circumstances.</p> <p>We intend to follow up with applicants who identify a vulnerability either due to physical or cognitive vulnerabilities.</p>
<p><b><i>Application Process and Tenant Experience</i></b></p>	<p>Positive feedback was received about the vetting process for future clients. Emphasis was placed on the importance of using clear, precise, and succinct language in all communication.</p> <p>A recent tenant expressed satisfaction with how Bield managed their application process.</p>	

Topic	Issue	Response
<b><i>Living Conditions and Tenant Safety</i></b>	There was a comment highlighting the challenges faced by elderly individuals living near neighbours with substance abuse issues. Such scenarios reportedly lead to increased fear and anxiety.	This comment is noted and will be shared with relevant colleagues. While we will not discriminate against individuals with a substance abuse issue, we will work with agencies to identify support for them as far as possible.
<b><i>Defining Vulnerability</i></b>	A respondent suggested that the criteria should specify vulnerability to ensure that allocations are made to those most in need. The feedback underscores the complexity and multifaceted nature of our allocation policy.	

### **Nomination Agreements**

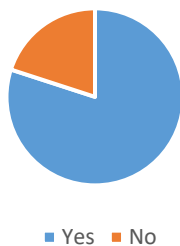
The subsequent proposal focused on nomination agreements.

We proposed comprehensive review and update of our nomination agreements, aiming to ensure they align with the best interests of both tenants and Bield..

Out of 40 respondents to this question, 32 (or 80%) were in favour of reviewing and updating the nomination agreements.

Conversely, 8 respondents, constituting 20% of the feedback voiced concerns or offered suggestions.

Do you agree with our proposal to review nomination agreements?



The feedback provides diverse perspectives on nomination agreements.

While there is strong consensus supporting the idea of these agreements, there's also a clear desire for a nuanced approach.

Respondents emphasise the importance of ensuring that the updates prioritise the welfare and satisfaction of all residents, both an new and existing.

This means that a significant 80% of the feedback collected is in support of the proposed recommendation. However, 20% did share some concerns, some of which are summarised in Table 2.

The feedback indicates a range of perspectives on nomination agreements. It's clear that while many support the agreements in principle, they hope to see a more discerning and careful approach to ensure the welfare and satisfaction of both new and existing residents.

## ***Equalities***

The next proposal focused on our approach to equalities.

Key elements of the proposal are:

- Strengthening our efforts in data collection regarding protected characteristics to further our understanding of our applicants
- Ensuring a comprehensive Equality Impact Assessment (EIA) is conducted whenever a new proposal is added to the policy
- Incorporating explicit statements in both our policy and our literature to emphasise our stance towards applications from LGBT+, BAME and other diverse groups

From the feedback gathered, 33 out of 42 respondents (approximately 79%) supported our inclusive approach to equalities.

However, 9 respondents (about 21%) raised concerns and additional insights. For a more detailed breakdown of the specific concerns and suggestions, please refer to Table 3.

In light of this feedback, it's pivotal to clarify a critical point: collecting data on protected characteristics does not, in any way influence priority or outcome of an application.

Instead, this data aids us in evaluating wither individuals with protected characteristics response, it is important to note that protected characteristics are accessing our services.

If gaps or disparities are identified, this insight empowers us to address and rectify such deficiencies proactively.

*Table 2 Summary of comments and concerns relating to nomination agreements*

Topic	Issue	Response
<b>Appropriateness of tenants</b>	<p>There were concerns raised about the suitability of nominees, particularly those with alcohol and drug-related problems.</p> <p>Some respondents felt that such individuals might not be the right fit for the housing offered by Bield.</p>	<p>We will reinstate in person assessments for many applicants, particularly where a vulnerability is identified, to ensure the safety of the applicant and other tenants, as well as identifying support.</p>
<b>Consideration of existing residents</b>	<p>Stakeholders emphasised the need to consider the current residents of schemes when thinking of introducing new tenants.</p> <p>They felt that the integration of certain new tenants might pose challenges or discomfort for existing ones.</p>	<p>As above</p>
<b>Influence of Relationships</b>	<p>Some respondents believed that nominations should not favour friends and relatives of current tenants. They felt such a practice could potentially lead to feelings of isolation among other residents.</p>	<p>The current and proposed policy, allocations will be based on points and will not be influenced by relationships of existing tenants.</p>



Topic	Issue	Response
<p><b>Perceptions of Local Authorities</b></p>	<p>Comments reflected a desire for local authorities and other partners to invest more in house building. There was also a mention of perceived delays in filling vacancies, with some thinking that Bield had ceased accepting nominations from the local authority.</p>	<p>We work with local authorities to fill vacancies where appropriate. We are working to improve void turn around and allocation times.</p>
<p><b>Unintended Consequences</b></p>	<p>Concerns were raised about the potential unintended outcomes of the current allocation policy. There were suggestions that the nomination of mainstream applicants without additional needs might expose vulnerable existing tenants to undesirable behaviours and risks.</p>	<p>We currently and will continue to operate a points based allocation system, so that those with the most points will be allocated the next home.</p> <p>However, we note the feeling of some existing tenants about safety and will share this with relevant colleagues.</p>

*Table 3 Summary of comments and concerns relating to our approach to equality*

Topic	Issue	Response
<b>Protected characteristics</b>	A respondent emphasised that it may not be necessary to single out LGBT+ and BAME groups, suggesting that other groups also hold significant importance and might be overlooked.	<p>We appreciate that there may be a number of groups that might be overlooked and would welcome suggestions on those.</p> <p>We have existing evidence that in particular LGBT+ and BAME groups are underserved by public / third sector services and we are keen to address this inequality in the first instance.</p>
	Another individual mentioned living in an Independent Living complex. They observed recent allocations that did not appear to represent diverse racial backgrounds, pointing out a noticeable absence of people of colour. They wondered if this was just coincidental.	We are aware of this situation. We will start collecting information on this systematically so that we can monitor this situation.
	One respondent seemed confused about the specifics of the terms LGBT+ and BAME and	No comment

Topic	Issue	Response
	<p>stressed that the considerations of these residents are paramount when addressing equality issues.</p>	
	<p>A comment highlighted that a person's living arrangements shouldn't be influenced by their sexual orientation.</p>	<p>Sexuality will not influence the allocation of the home, but we need to ensure we systematically collect information on these groups to ensure we offering an inclusive service that meets the needs of everyone.</p>
	<p>There was a concern expressed about potential unrest and complications arising within the complex due to equality considerations.</p>	<p>We are an inclusive landlord and seek to ensure our services are available to all.</p>
	<p>Another respondent was clear in their belief that personal characteristics like sexual orientation and racial background should remain private. They emphasized that these factors shouldn't play a role in tenancy applications or influence point awards. They added that true equality would only be realized</p>	<p>These characteristics do not influence whether or not an applicant is allocated a home. However, we need to systematically collect this information to know that we are being inclusive and our services are available to all. Equality is not about treating everyone exactly the same, but ensuring that everyone has the same opportunities and</p>

Topic	Issue	Response
	when applications are assessed without these influences, drawing a parallel to job applications that exclude such details.	assistance to over come institutional and societal bias and historical discrimination.

## ***Key Performance Indicators***

The subsequent proposal focused on embedding relevant key performance indicators (KPIs). Respondents were invited to suggest performance areas and KPIs they believed would be critical. The feedback consolidated into the following categories.

### **Performance and KPIs**

- Incorporate Difficult to Let (DTLs) when setting KPIs for void turnovers, such as for studio flats.
- Align with newly approved performance framework for business health and operational KPIs
- Regularly monitor and report metrics including days properties remain unlet, tenancy sustainability over 12 months, and the duration to let the properties.

### **Estate Management**

- Define precise targets and standards for property repairs.
- Enhance communications, especially concerning repair statuses.
- Oversee external contracts, such as window cleaning, with efficiency

## Cleanliness & Maintenance

- Establish a standardised cleaning protocol for vacated properties.
- Implement a requirement to submit photos of cleaned properties to the Housing Officer for inspection prior to tenant allocation.
- Consistently maintain communal areas with regular cleaning

## Staff & Management:

- Ensure quick response times from staff, especially local ones, provide prompt responses to questions and issues.
- Uphold a consistent standard of service across management teams
- Engage with tenants professional, emphasising inclusivity and accessibility  
Management should engage with all tenants professionally, ensuring inclusivity and approachability.
- Prioritise the emotional well-being of residents, attending to their specific needs.

## Tenant Relations

- Actively listen and respond to tenant feedback
- Promote an inclusive environment, especially in communal areas, swiftly addressing any issues of exclusivity or inappropriate behaviour
- Maintain transparency in all operations

## Housing Criteria & Inclusivity

- Prioritising housing for individuals with additional functional needs and those requiring support.
- Exercise equality in its truest sense, ensuring no discrimination.
- Show empathy and understanding towards the needs and concerns of existing tenants.

## Building Assessment

- Implement regular assessments of building infrastructure quality, focusing on roofing and external walls, to detect and rectify any failings promptly.

### ***Short Scottish Secure Tenancies for home-owners***

In accordance with the Housing (Scotland) Act 2014, social landlords are permitted to offer homeowners short Scottish Secure Tenancies while they make alternative living arrangements.

We solicited opinions on whether we should maintain our current practices or extend provision of these short-term tenancies.

Our of the feedback received:

- 26 respondents suggested continuing business as usual
- 14 respondents were in favour of exploring short Scottish Secure Tenancies.

***Considering the feedback, we have decided to maintain our current practices and will not investigate provision of short Scottish Secure Tenancies for homeowners at this time.***

The diverse viewpoints are summarised in Table 4. The feedback demonstrates contrasting perspectives.

While some respondents see the potential advantages of offering short-term tenancies, others expressed reservations concerning community stability and equity for those seeking long-term housing.



*Table 4 Summary of comments and concerns relating to SSSTs for Home owners*

Topic	Issue	Response
<b>Community Concerns</b>	<p>There's a worry that introducing short tenancies could disrupt the sense of community and the ethos of the building.</p> <p>There's a preference against a transient community environment. Some residents or stakeholders might value stability and longer-term neighbours</p>	<p>Acknowledged</p>
<b>Fairness &amp; Prioritisation</b>	<p>Some respondents believe it's unfair to those waiting for permanent accommodation.</p> <p>The point was raised that someone could miss out on a long-term home if it's given to someone who only wants it for a shorter period, such as 6 months.</p> <p>There's an emphasis on prioritizing tenancies for those with vulnerabilities and requiring additional support.</p> <p>Some suggest that existing applicants should be treated preferentially.</p>	<p>Acknowledged</p>

<p><b>Special Circumstances and Vulnerabilities</b></p>	<p>In cases where properties aren't suitable due to illness or disability, or where a tenant needs a more secure home, there should be a provision for them to be rehoused temporarily until their property is sold.</p> <p>Bield should consider special circumstances and provide help when required.</p>	<p>We could still do this with a normal Scottish Secure Tenancy.</p>
<p><b>Benefits and Positive Feedback</b></p>	<p>Some see the introduction of short tenancies as a reasonable solution that benefits homeowners while also providing income to Bield.</p> <p>There's a sentiment that this could be a good idea, but it might be best decided by the local management team.</p>	

### **Local Letting Initiatives**

We proposed an update to the Local Letting Initiatives, integrating them with Cx to streamline their management through automation.

Feedback received was 35 respondents in favour of our proposal, and 4 respondents voiced concerns.

Do you agree with our proposed approach to Local Letting Initiatives?



■ Yes ■ No

The detailed feedback and concerns are captured in Table 5.

These comments underscore the importance of designing local letting initiatives with care.

While there is evident appreciation for the potential efficiencies and advantages, the feedback also emphasises the imperative to safeguard the tranquillity, security and overall welfare of existing communities.

As we move forward, striking a balance between innovative letting strategies and ensuring community wellbeing will be pivotal.

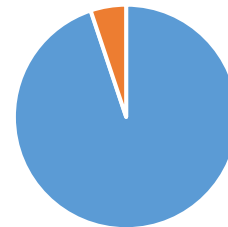
## Veterans

We suggested adding a specific question to identify veterans in our process. The identification won't affect the points given to an applicant, it would help us guide them to suitable agencies for potential support.

Respondents were asked if they supported this proposal. 37 respondents supported this proposal, while 2 respondents shared concerns.

Their detailed concerns and remarks can be found in Table 6. The feedback highlights the significance in recognising and responding to the unique needs of veterans.

Do you agree with our proposals relating to veterans?



■ Yes ■ No

*Table 5 Summary of comments and concerns relating to local letting initiatives*

<b>Topic</b>	<b>Issue</b>	<b>Response</b>
<b>Distinctiveness</b>	There's a belief that Bield should introduce unique letting initiatives, setting it apart from other organisations.	Acknowledged
<b>Digital Support &amp; Expansion</b>	<p>Questions arise about the consistency of local letting approaches across different areas, especially with the expansion of digital support.</p> <p>It's essential to ensure that digital initiatives maintain, if not enhance, the quality of service and accessibility for tenants.</p>	This seems to relate to digital support rather than allocations, but this will be shared with relevant colleagues.
<b>Community Support &amp; Renovations</b>	<p>A strong sentiment was expressed about doing more for the homeless and refugees.</p> <p>Rather than demolishing properties, it's suggested they be renovated and let to individuals in dire need.</p>	<p>We will continue to work with local authority partners to identify how we can support people experiencing homelessness and refugees.</p> <p>Our empty properties will be reviewed as</p>

Topic	Issue	Response
<b>Potential Issues with Mainstream Tenants</b>	<p>Concerns were raised about potential issues arising when the status of some sheltered accommodations changes.</p> <p>Problems cited include new tenants moving in who might be using drugs, exhibiting aggressive behaviours, hosting disruptive parties, and thereby compromising the safety and peace of the existing tenant community.</p>	<p>part of our Strategic Asset Management Strategy.</p> <p>The status from sheltered to retirement housing has been completed for some time. Allocations are still made based on need.</p> <p>We will share this comment with relevant colleagues to ensure assistance is provided.</p>

*Table 6 Summary of comments and concerns relating to proposals to support Veterans*

Topic	Issue	Response
<b>Support &amp; Safety</b>	<p>There's appreciation for the support shown towards veterans.</p> <p>A point was made regarding the potential support needs of veterans, especially those suffering from PTSD (Post-Traumatic Stress Disorder). There's a recommendation to monitor some veterans closely to ensure the safety of other residents or tenants, especially vulnerable ones. This is framed as a cautionary note rather than a negative comment.</p>	<p>We are pleased that this is recognised and we hope to play a small part to support his group.</p> <p>While we understand concern, we do not anticipate high levels of PTSD as our applicants will not be direct service leavers. However, if we have information on veteran status, we can refer to relevant charities for support more quickly should it be required.</p>
<b>Neglect by Authorities</b>	<p>There's a sentiment that veterans, especially specific groups like the Ghurkas, can be overlooked by</p>	<p>Acknowledged</p>

Topic	Issue	Response
	<p>authorities, particularly when they have additional disabilities.</p>	
<p><b>Vulnerability &amp; Accommodation Needs</b></p>	<p>If a veteran is vulnerable and needs support, especially if they'd be at risk in mainstream accommodation, they should be given consideration for specialized housing or support.</p>	<p>The point of this is not to attract vulnerable veterans per se, but to understand the profile of tenants and make connections for this group if required</p>



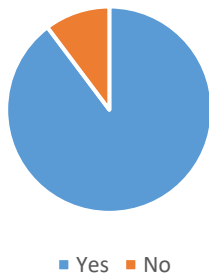
**Domestic abuse**

We proposed the creation of a dedicated policy addressing domestic abuse.

From feedback received, 35 respondents agreed with our proposals, while 4 respondents share concerns. Details of these comments and concerns are summarised in Table 7.

The feedback accentuates the sensitive nature of dealing with domestic abuse issues. To navigate these concerns, there's a pronounced need for thorough training, comprehensive policies, and a primary focus on ensuring the safety of all tenants and colleagues.

Do you agree with our proposals relating to domestic abuse?

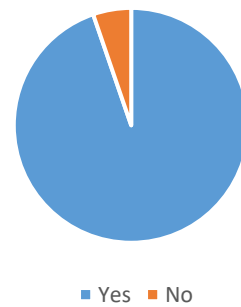


**Harassment**

We proposed and update to the definitions of harassment, ensuring a broader range of protected characteristics are captured.

From the feedback received, 36 respondents agreed with these proposals, while 2 expressed concern. Detailed comments can be referenced in Table 8.

Do you agree with our proposals relating to harassment?



The comments we received veered more towards the experiences of our current tenants rather than allocation processes. This invaluable feedback will be relayed to the appropriate teams within Bield, as we consider proactive measures to address these concerns.

*Table 7 Summary of Comments and Concerns relating to proposals in relation to Domestic Abuse*

<b>Topic</b>	<b>Issue</b>	<b>Response</b>
<b>Safety Considerations</b>	Decisions relating to housing individuals affected by domestic abuse should ensure the safety of all parties involved. The overarching concern is to establish a safe environment for everyone.	Agreed
<b>Allocation Policy &amp; Separate Policies</b>	Some suggest that domestic abuse considerations should remain within the original allocation policy.  A preference was expressed for a separate policy specifically addressing domestic violence (DV) for tenants.	A separate policy will cover how we can help applicants, but also outline how we can support tenants as well as staff.
<b>Concerns about Other Tenants</b>	Worries are raised that other tenants could potentially be at risk in scenarios involving those affected by domestic abuse.	We will work to ensure the safety of all. Domestic abuse happens with or without a policy and strategic response.
<b>Specialised Training for Staff</b>	There's a strong sentiment about the unique challenges faced by individuals who've suffered from abuse. Those who've not experienced it might lack a deep understanding.	Agreed, this will be included in the specific Domestic Abuse policy.

Topic	Issue	Response
	It's recommended that staff dealing with abused individuals receive specialist training to handle such sensitive situations effectively and empathetically.	

*Table 8 Summary of comments relating to proposals in relation to harassment*

Topic	Issue	Response
<b>Ignoring harassment</b>	There is a perception that harassment is prevalent in many buildings and it is not dealt with effectively.  Some feel that harassment issues are not addressed with the necessary vigour or seriousness. There's a sentiment that those causing problems seem to have more rights than those raising complaints.	We will share this with relevant colleagues as this relates to operations rather than allocations
<b>Need for specialised training</b>	It's emphasized that dealing with harassment requires specialized training to effectively address and prevent such incidents	
<b>All cases are important</b>	It's vital to recognize the significance of all cases of harassment and abuse, regardless of the	We will share this with relevant colleagues as this

Topic	Issue	Response
	background, gender, or race of the individuals involved.	<p>relates to operations rather than allocations</p> <p>In terms of allocations, harassment due to protected characteristics will be recorded so that we can share this information with relevant partners, rather than to have an outcome on the allocation process.</p>
<b>Reporting &amp; Proof</b>	There's a suggestion that all instances of harassment should be reported. Furthermore, tenants should be obligated to provide evidence when making harassment claims.	

### **Verification**

We aim to revise our current procedures to necessitate verification for various facets of the application, including confirming one’s identity.

From the feedback gathered, 34 respondents agreed with these proposals, while 5 had concerns or additional comments.

Do you support our proposals relating to verification?



■ Yes ■ No

For a detailed breakdown refer to Table 9.

The feedback underscores the importance of thorough and trustworthy verification processes. While efficiency is valuable, it should not come at the expense of accuracy, safety, or thoroughness.

### **Medical assessment**

We proposed a shift towards an asset based approach in medical assessments. The primary objective of this approach is to evaluate how a Bield property could potentially enhance the quality of life for the individual.

From the feedback, 35 respondents agreed with this approach, while 4 respondents had questions or concerns.

Do you support our proposal in relation to medical assessments?



■ Yes ■ No

For a detailed account of these perspectives, refer to Table 10.

The collective feedback underscores the significance of considering the ways in which relocation can positively impact an individual's health and wellbeing. Mobility emerges as a pivotal factor in these considerations.

*Table 9 Summary of comments and concerns relating to verification*

<b>Topic</b>	<b>Issue</b>	<b>Response</b>
<b>Clarification</b>	There's a need for more clarity and explanation about what is meant by "verification" or how the process is conducted.	We will take this on board for future consultations
<b>Vetting for Suitability</b>	Some suggest that all individuals should undergo thorough vetting to determine their suitability for tenancy or other related matters.	We will work to do this as part of our updated procedures
<b>Concerns about Streamlined Verifications</b>	There's a perception that streamlining the verification process might lead to oversights or shortcuts, which could jeopardise the safety or well-being of current residents	We are looking to extend rather than streamline verification, but automating where possible
<b>Face-to-Face Interactions</b>	<p>A point is made about the importance of face-to-face interactions for verification. One comment notes that telephone conversations might not be reliable for confirming an individual's identity or suitability.</p> <p>The recommendation is to have a dedicated team that goes out for on-site visits to meet and assess potential tenants.</p>	We are working to reinstate face to face meetings where this is required.

*Table 10 Summary of comments relating to medical assessment*

Topic	Issue	Response
<b>Feasibility of Home Visits</b>	<p>There's concern about the feasibility of staff conducting home visits for medical assessment purposes.</p> <p>Doubts exist regarding the qualification of staff to make judgments based on medical assessments. There's a preference for relying on supporting documentation from GPs or social workers.</p>	<p>We are not proposing for staff to make judgements relating to medical assessments. We are shifting our focus to an asset based approach, finding how a move will improve health and wellbeing based on mobility and support.</p>
<b>Seeking Professional Guidance</b>	<p>Questions arise about the partnering professionals or institutions for medical assessments.</p> <p>There's a call to confirm and clearly communicate the professionals from whom advice will be sought.</p>	<p>We will not be conducting medical assessments but enquiring how a home will improve quality of life based on mobility and support.</p>
<b>Inclusion of "Prefer Not to Say" Option</b>	<p>A suggestion is made to include an option for individuals to choose "prefer not to say" regarding their medical status or details.</p>	<p>This is an option, but if it not disclosed it will not be taken into account</p>

Topic	Issue	Response
<b>Concerns about Proper Assessments</b>	<p>Some feel that certain tenants require more assistance than they currently receive due to lack of proper medical assessment.</p> <p>There's a perception that other tenants might be adversely affected by these inadequate assessments.</p>	As a landlord, we do not assess for support. This is a local authority function. However, we can identify how to make referrals and work with tenants to identify their needs.
<b>Limitations of Telephone Assessments</b>	Doubts are raised about the efficacy of telephone-based medical assessments, especially when gauging conditions like dementia.	We will implement face to face meetings in these circumstances where we can.
<b>Clear Guidelines</b>	There's a call for clear guidelines regarding the medical requirements that support applications.	We will not be undertaking medical assessments, but we will enquire about mobility and wellbeing.
<b>Issues with Prior Experience</b>	One respondent shares a personal experience where they felt their mobility and health issues were disregarded during a transfer assessment.	Thanks for sharing this experience



### **Sensitive lets**

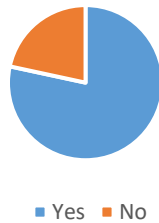
Our proposal regarding sensitive lets was to continue with the process with relevant checks and balances in place, leveraging Cx where applicable.

From the feedback, 29 respondents agreed with this approach, while 8 people shared concerns or comments. A detailed breakdown of these viewpoints can be found in Table 11.

This feedback illustrates the concerns of existing tenants, primarily focused on safety and security.

While implementing some of the suggestions might not be feasible due to concerns related to confidentiality and potential discrimination, we commit to sharing these viewpoints with colleagues.

Do you support our proposal relating to sensitive lets?



### **ASB Evidence**

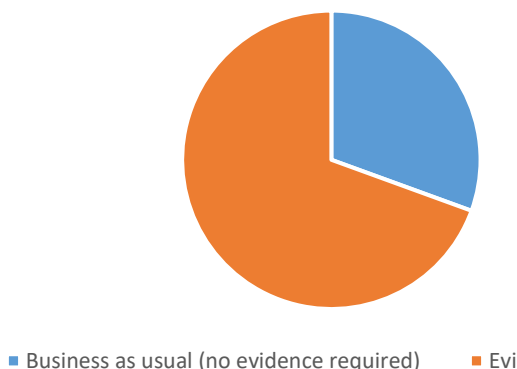
In relation to gathering evidence of Antisocial Behaviour (ASB) as part of an application, we proposed two options. Firstly, if an applicant mentioned in their application that they are facing ASB issues, should require some level of evidence? The second option was to continue our operations as they are.

From the feedback, 11 respondents felt we should continue with business as usual, while 25 supported the proposal to start requiring evidence. For a detailed view of the feedback, refer to Table 12.

The overarching sentiment from the responses underscores the importance of clear communication and diligent verification.

There's a clear indication towards preserving communal peace and unity by meticulously assessing any cited instances of antisocial behaviour in potential tenants.

What should our approach to evidence be?



*Table 11 Summary of comments relating to sensitive lets proposals*

<b>Topic</b>	<b>Issue</b>	<b>Response</b>
<b>Clarity on the Term</b>	<p>Multiple respondents express uncertainty about what is meant by "sensitive lets."</p> <p>There's a call for a clearer definition or explanation of the term so that respondents can provide informed feedback.</p>	<p>We will take this on board for future consultations</p>
<b>Vetting and Legalities</b>	<p>There's a suggestion that if "sensitive lets" refers to individuals with a criminal history, the proper legal protocols should be adhered to.</p> <p>Mention of the importance of vetting, especially regarding mental health concerns.</p>	<p>Sensitive lets relates to identified patterns of behaviours of current tenants and using discretion to allocate in a sensible way not to inflame any unwanted behaviours.</p>
<b>Consultation with Current Residents</b>	<p>A comment mentions that while residents generally welcome new tenants, they would like to be consulted if "sensitive" individuals are being considered as potential tenants.</p>	<p>We would not 'consult' tenants on applicants as this would breach confidentiality. However we can use the sensitive lets policy to help avoid allocations that may exacerbate unwanted behaviours.</p>

*Table 12 Summary of comments relating to ASB evidence*

Topic	Issue	Response
<b>Understanding of ASB</b>	A few respondents are uncertain about what "ASB" means, indicating a need for clearer communication or a glossary of terms.	We will learn from this for future consultations.
<b>Support for Pre-Allocation Visits</b>	<p>Multiple comments express support for reinstating or continuing with pre-allocation visits.</p> <p>The belief is that these visits help in assessing the suitability of potential tenants and gathering evidence.</p>	We will be reintroducing face to face meetings for relevant applicants where possible.
<b>Documentation and Evidence</b>	<p>There's a recommendation to require documentation to be submitted during the application process, which can be reviewed at the point of allocation to understand if any anti-social behaviour is ongoing.</p> <p>The importance of checking all evidence is emphasised, and the necessity to ensure all application information is backed by evidence is suggested.</p>	We will be reintroducing face to face meetings for relevant applicants where possible.

Topic	Issue	Response
<b>Importance of Consideration</b>	<p>A comment highlights the importance of giving careful consideration to ASB, emphasising the need for sensitivity to the needs of all residents.</p> <p>There's a concern about potential problems arising if evidence isn't adequately reviewed or required beforehand.</p>	<p>We will be reintroducing face to face meetings for relevant applicants where possible.</p>

### ***Bypass, Deferrals, and Suspensions***

We presented several suggestions concerning how we handle bypassing applicants, as well as deferrals and suspensions.

From the responses, 32 respondents supported our proposals, while 5 had comments or concerns.

A prevailing feedback was that some respondents were unfamiliar with these specific terms. Taking this into account, we commit to ensuring clarity in our future consultations by providing well defined explanations for terms and processes used.

Do you support our proposals relating to bypass, deferrals and suspensions?



### ***Management Discretion***

Our suggestion regarding proposal for management discretion was to continue this approach, updating the roles and responsibilities to reflect current structure.

30 respondents agreed with this proposal, while 8 had comments and concerns. Table 13 summarises these comments and concerns

Do you agree with our proposals relating to management discretion?



These feedback points underscore the importance of establishing clear guidelines, training for managers, ensuring fairness in decision-making, and fostering open communication with tenants.

### ***Overall Comments***

Respondents were asked to provide any other comments in relation to the proposals or policy in general. These comments are summarised in Table 14.

*Table 13 Summary of comments relating to manager discretion*

<b>Topic</b>	<b>Issue</b>	<b>Response</b>
<b>Record Keeping</b>	There is a clear call for implementing a comprehensive recording system. This is essential for auditing purposes and for understanding the rationale behind certain discretionary decisions.	This will be done through our housing management system Cx.
<b>Need for Transparency</b>	Respondents desire a clearer explanation of the criteria and processes behind management discretion. There is a need for transparency and openness regarding how such decisions are made.	This will be managed through our housing management system Cx.
<b>Concerns over Nepotism</b>	There are concerns about potential biases or favouritism in decision-making, especially if decisions might be influenced by relationships or personal connections.	This is strictly governed through our code of conduct and entitlements and payments policy. There are severe penalties for breaches in place.
<b>Qualifications and Training</b>	Questions have been raised about the qualifications of managers to make certain discretionary decisions. There might be a need for specialized training or guidelines	These decisions will be made with the Housing Service Managers.

Topic	Issue	Response
<b>Consistent Framework vs. Individual Discretion</b>	There's a balance to be struck between having a uniform structure in place for fairness and allowing managers the flexibility to make decisions based on their intimate knowledge of tenant needs.	We hope to strike this balance, as it will be for very exceptional circumstances.
<b>Privacy Concerns</b>	Data protection and privacy are crucial. There is feedback indicating that some managers may be sharing private information about tenants with others, which would be a violation of data protection norms.	We will share this with relevant colleagues to ensure we prevent breaches
<b>Concerns Over Unfair Practices</b>	There are anecdotes and comments hinting at certain applicants being consistently overlooked, suggesting potential biases or inefficiencies in the system.	We operate a strict points based system, with the person with the most points being allocated the vacant home. We know this may feel frustrating, but points positions can change and new applicants may have a higher level of need at the point in time.
<b>Decision Making Should</b>	Decisions made using management discretion should always prioritize the best interests of the applicant and the existing community.	Agreed



Topic	Issue	Response
<b>Reflect Best Interests</b>		

*Table 14 Summary of general comments*

Topic	Issue	Response
<b>Review of Letting System and Policies</b>	<p>A call for a comprehensive review of all letting policies.</p> <p>Desire to reinstate older policies such as age caps and pre-allocation visits.</p> <p>Concerns about younger tenants causing disturbances.</p>	<p>This may refer to local letting initiatives. We introduce these where we have no current applicants on the list and we need to widen our search for new tenants.</p> <p>Age eligibility is outlined as part of local letting initiatives as mentioned above.</p> <p>Younger tenants – ie those aged 55+ are bound by same tenancy agreement and can be asked to adhere to same conditions as all tenants</p>

Topic	Issue	Response
<b>Wheelchair Allocations</b>	Strong sentiment for prioritising wheelchair users in allocations.	Agreed these individuals are within the reasonable preference categories.
<b>Pet Policy Concerns</b>	<p>Issues related to dogs wandering unsupervised in common areas.</p> <p>Concerns about residents running dog-related businesses from their flats.</p>	<p>Allocations – applicants are advised to seek permission for pets and are asked to adhere to responsible pet ownership policy.</p> <p>Existing tenant issues can be managed through responsible pet ownership policy.</p>
<b>Vetting and Suitability of Tenants</b>	Emphasis on vetting tenants to ensure compatibility with existing residents and their capability to live alone.	We will look to introduce face to face meetings when appropriate
<b>Tenant Involvement and Communication</b>	<p>A call for increased engagement and consultation with tenants.</p> <p>Desire for Bield to take feedback more seriously and act on it.</p> <p>Suggestion for regular meetings with all tenants</p>	We have a programme of consultation and engagement that we will be promoting, and identifying further ways for tenants to engage

Topic	Issue	Response
<b>Roles and Responsibilities</b>	<p>Feedback on passing off responsibility instead of directly addressing concerns.</p> <p>Issues with decision-making being detached from the ground realities that scheme managers deal with.</p>	<p>We will explore how to empower local managers as part of our strategic work.</p>
<b>Definition and Allocation of Retirement Housing</b>	<p>Concerns about allotting retirement housing flats to younger working individuals.</p>	<p>We sometimes extend age eligibility for local letting initiatives where we have a limited or no applicants on the list for that development.</p>
<b>Profit vs. Welfare Concerns</b>	<p>Some apprehensions about decisions being made primarily based on profit motives.</p> <p>Worries that organizational changes might be driven by profit rather than the welfare of the tenants.</p>	<p>Bield is a not for profit organisation. Welfare of our tenants is paramount.</p> <p>We let houses to those in housing need and work with agencies where relevant to access support if required.</p>
<b>Protecting Sheltered Housing</b>	<p>An expressed need to maintain the integrity of sheltered housing and ensure</p>	<p>We let housing based on need. Those in greatest need are allocated our homes.</p>

Topic	Issue	Response
	that it is reserved for vulnerable individuals.	Not all vulnerabilities are visible and we ask that everyone is treated with kindness.
<b>Empathy for Scheme Managers</b>	Acknowledgment of the challenges faced by scheme managers in dealing with tenant issues, especially when overarching policies may not be in their favour.	We will look to explore this as our policies are developed to ensure health and safety of everyone, wellbeing, compliance with legislation and regulations and making homes where people can live their best lives.

## **Partnership Forum Discussion**

The Partnership forum were asked to evaluate the same proposal during their meeting on 3 August 2023.

A significant aspect of their discussions revolved around the allocation of homes to individuals with cognitive vulnerabilities and the subsequent implications for both the individual's safety and that of the broader community.

The concerns voiced have been duly noted. As a result, our approach will evolve to incorporate face to face visits whenever cognitive vulnerability is identified. This is crucial to ascertain that a Bield residence offers a secure and accommodating environment for such individuals.

Additionally, we are committed to collaborating closely with pertinent agencies. This collaboration aims to ensure that these individuals receive the tailored support they necessitate. We recognise the concerns raised.

We will work to reintegrate the face to face visits when a cognitive vulnerability is identified to ensure that a Bield home is a safe environment for those individuals, and to work with relevant agencies to identify the relevant support for those individuals.

## Conclusion

The consultation process has been invaluable, drawing insights from a diverse range of stakeholders, including the Partnership Forum, tenants, and our colleagues. Their collective feedback underscores a unanimous call for an allocation policy that is not only adaptive and responsive, but also deeply rooted in inclusivity.

Throughout this consultation, we have been transparent about our methodology, ensuring that our stakeholders have a clear understanding of our proposed changes and the rationale behind them. This transparency has fostered a constructive dialogue, allowing for a comprehensive collection of insights and concerns.

The feedback we've gathered will inform the nuances of our communication strategy, ensuring clarity and preventing potential misunderstandings. Moreover, it will play a significant role in shaping the final procedures we adopt, ensuring they are both practical and reflective of our tenant's needs.

In accordance with the Housing (Scotland) Act 2014, we are committed to publishing this report, emphasising our dedication to transparency and the importance we place on feedback from our stakeholders.