



NW3 CLT Draft Allocations Policy

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1. Introduction

- 1.1. This policy for the allocation of intermediate / low-cost ownership homes on 31 Daleham Gardens, which may only be resold in a way that preserves their affordability for other eligible households in future. The 31 Daleham Gardens scheme will also include 3 rented homes with residents allocated by Camden Council. This policy covers the following:
 - Guiding principles
 - Eligibility criteria
 - Allocations process
- 1.2. NW3 CLT will be responsible for allocating a number of homes with one, two or three bedrooms to their first owners shortly before the completion of construction, expected in 2025/26. Demand for these properties will be high and therefore a fair and robust allocation policy and process will be needed to ensure the success of the project.
- 1.3. This policy is based on the outcomes from a survey of NW3 CLT members in 2021, as well as contributions from an allocations sub-committee, board members, and project managers Altair. This policy is currently for the initial allocation of units and does not as yet detail a specific process for allocations at future resale, although we expect this will broadly follow the same principles.
- 1.4. Future NW3 CLT sites may be based on this policy but may also engage in a similar member-led process to set out their guiding principles, allocation criteria and application process.
- 1.5. For the purposes of this policy the Local Area is NW3 and adjacent postcodes (NW11, N2, N6, NW5, NW1, NW8, NW6, NW2) within the London Borough of Camden.
- 1.6. In line with the NW3 CLT Equality and Diversity Policy no person or group of persons applying for accommodation will be treated less favourably than any other person because of their race, colour, ethnic or national origin, gender, religion, sexual orientation, physical disability or marital status or any other factor that is strictly prohibited by law.
- 1.7. NW3 CLT is seeking to address local intermediate housing need and will endeavour to advertise its properties in such a way that a significant cross-section of the local population will have an opportunity to express an interest.

2. Guiding principles

2.1. Overview of principles

NW3 CLT commits to taking all reasonable steps and making reasonable allowances to adhere to the following principles:

- Fairness
- Transparency
- Simplicity
- Legality
- Scalability

2.2. Fairness

- 2.2.1. Allocations of units will be determined solely on the extent to which the criteria have been met and therefore will be free from discrimination.
- 2.2.2. The applications process will be made accessible to all regardless of age, gender, ethnicity, religion or ability (including mental health).
- 2.2.3. Considerations will also make the process accessible to all persons regardless of education, literacy (including financial and IT) and level of spoken English.

2.3. Transparency

- 2.3.1. The scoring process will be made available for those that apply and their scores will be available to them. The scores of other applicants will not be shared.
- 2.3.2. It will be made clear in the application process which level of personnel are making which decisions and at which point in the process.

2.4. Simplicity

- 2.4.1. The ability to demonstrate the meeting of the allocation criteria will be made as simple as possible.
- 2.4.2. The application process will also be easy to follow with paperwork limited to the minimum.
- 2.4.3. At no point will questions or evidence requirements be designed to catch applicants out or be unclear as to why the question is being asked.
- 2.4.4. All paperwork, forms and guiding information will be concise and written in plain English.
- 2.4.5. Translated versions or translators will be made available where possible.

2.5. Legality

- 2.5.1. Allocations are made in accordance with the Disability and Discriminations Act, and the Race Equality Act.
- 2.5.2. The applications process will adhere to the Data Protection Act and the Freedom of Information Act.
- 2.5.3. Any financial transactions and services offered will be in accordance with the FCA.

2.6. Scalability

- 2.6.1. The policy and applications process must be such that it can be applied to a large number of applicants (possibly hundreds).
- 2.6.2. The policy and applications process must also be such that it can be replicated for other NW3 CLT sites in future. The following table provides an example of how the principle can be monitored and/or ensured:

Principle	Example for monitoring and ensuring
Fairness	<ul style="list-style-type: none"> • Detachable monitoring form from application • Work with support, community and advocacy groups to help individuals with application process (volunteers)
Transparency	<ul style="list-style-type: none"> • Provide a clear supporting leaflet or information online outlining where decisions are made and by who • If and when any part of the process changes, to make every effort to ensure all applicants are made aware of this change and reasons for the change
Simplicity	<ul style="list-style-type: none"> • Use forms such as the housing application as bench mark – no longer and if possible shorter and considered simpler by the public • Follow guidance available from the Campaign for Plain English
Legality	<ul style="list-style-type: none"> • Seek support and guidance from legal experts on the policy and the more detailed process when documented
Scalability	<ul style="list-style-type: none"> • Test processes thoroughly before launch • Ensure resource is in place to implement the policy

3. Eligibility Criteria for allocations

3.1. Criteria and evidence

Each applicant household will be required to meet and exceed each of these four criteria. Failure to meet any one of these four criteria will result in an unsuitable application:

- Housing Need – More suitable (than current) accommodation required
- Local Connection - Minimum of five years connection to NW3 and surrounding postcodes, within the past 10 years
- Community Involvement and CLT support
- Financial and Affordability - Priced out of the open housing market locally and able to afford a NW3 CLT home

These criteria will need to be demonstrated through a variety of evidence such as references, third-party documentation and answers to an application form and questions from an Independent Allocations Panel (IAP).

3.2. Housing Need

More suitable (than current) accommodation required.

- 3.2.1. Applicants will be asked to specify whether they are applying for a 1, 2 or 3-bedroom unit or if they require specific modification or a ground floor unit. They will subsequently need to demonstrate their need for this type and/or size of unit and give the reasons they wish to move from their current accommodation.
- 3.2.2. Applicants should not own a home outright, but those who own a home through shared ownership or jointly with another household and intending to sell their existing home to finance a NW3 CLT home will be eligible.

3.3. Local Connection

Minimum of five years connection to NW3 and surrounding postcodes, within the past 10 years.

- 3.3.1. Given that one of the main purposes of NW3 CLT is to provide a way for people to live where they feel they belong, this is a key criterion.
- 3.3.2. The scope of this criterion will allow for those that have recently moved away, or those with breaks in their time living in the local area to apply, as well as those who may not be residents of the local area but are working in the area.
- 3.3.3. Applicants will be assessed through a scoring system on the strength of their connection to the area. For example, work, volunteering, children in local schools, access to local medical care, elderly parents living nearby etc and the length of time greater than 5 years.
- 3.3.4. This will likely be demonstrated subsequently by tenancy agreements, employment contracts and references. Applicants must be a British citizen or have indefinite leave to remain in the UK, must be at least 18 years old, and have a bank or building society account.

3.4. Community Involvement and CLT support

Belonging to and participation in the local community and the CLT

- 3.4.1. This criterion allows applicants to demonstrate their commitment to the local community, rather than simply a circumstantial connection to the area, and allows NW3 CLT to determine the extent to which the applicant is likely to be involved in and supportive of the aims of the CLT, and a committed and pro-active member of the community as well as their intent to be neighbourly. It should be noted that it is not assumed that certain types of involvement are better or preferable to others. This is an open criteria which also extends to people receiving support as well as providing it.
- 3.4.2. Applicants must become a member of NW3 CLT (membership is open to all). Higher scores will be awarded to those able to demonstrate an understanding of and commitment to the mission, vision and values of NW3 CLT, and an intention to be actively involved in the CLT and the ongoing management of the site. This also includes a demonstration of understanding the purpose, benefits and limitations of owning an NW3 CLT home. Applicants who are involved in other local community organisations and work will also be scored highly.
- 3.4.3. Evidence to satisfy this criterion is likely to be through answers provided in the application form and then verified in a meeting with the IAP as well as references from other local residents or members of local organisations.

3.5. Finance and Affordability

Priced out of the open housing market and able to afford a NW3 CLT home

- 3.5.1. Applicants will be required to demonstrate that, as a household, they neither have enough income nor savings or possibly future earning potential (such as in the case of pensioners) to purchase an appropriate, suitably sized property in the area from the open housing market. In all cases household income should be below £90,000.
- 3.5.2. Applicants with a low income, but sufficient savings that allow them to purchase from the open housing market locally will not be considered for a low cost-ownership home but sign-posted to our market sale units. Applicants unable to afford a low-cost NW3 CLT home and seeking accommodation on the Daleham Gardens site will be signposted for affordable rental options through Camden Council.
- 3.5.3. Shortlisted applicants must provide evidence that they have access to the finance needed to purchase a low-cost ownership home. This is likely to be a mortgage offer in principle and sufficient deposit in place but could be another type of loan or savings. This should provide assurance that they will be able to afford the repayment of any loans and manage the financial demands of home ownership such as ongoing maintenance and service charges.

4. Allocation process

- 4.1. In order to apply for and be allocated an intermediate / low-cost ownership home at 31 Daleham Gardens an applicant household must take a number of steps as outlined below:
 1. Become a member of NW3 CLT
 2. Pass a minimum eligibility test (pass/fail)
 3. Complete a form-based assessment (scoring and shortlisting)
 4. Attend a meeting with the Independent Allocations Panel (IAP)
 5. Accept allocation of unit and engage in the contract exchange / sale completion process
- 4.2. The steps have been identified in order to ensure the process meets the guiding principles and all reasonable measures are taken to ensure applicants meet the four criteria areas.
- 4.3. A scoring matrix will be applied to both the form-based application and the meeting with the Independent Allocations Panel (IAP) (steps 3 and 4). The purpose of scoring is to be as objective as possible in determining the strength of application and shortlisting for allocation. It will also help explain and provide clear reasons for why an applicant may be unsuccessful at the point of allocation even if they meet the minimum criteria.
- 4.4. The scores will be weighted in accordance with the priorities of the criterion as determined from the member survey on allocations, and set out below.
- 4.5. Decisions made by senior staff and/or directors are final and cannot be appealed against. Applicants can ask for feedback on their application at any step. However, any administrative errors or mistakes made by NW3 CLT or external staff resulting in an unsuitable application or low scoring can be reviewed.
- 4.6. Become a member of NW3 CLT (Step 1)
 - 4.6.1. All applicants must be an NW3 CLT member with a membership share. Being a community share offer shareholder will give the applicant no preferential treatment in the application and allocation process. Board members are not restricted from applying if they declare any a conflict of interest, such as that they must not be allowed to vote on any matters relating to allocations.
- 4.7. Pass a minimum eligibility test (Step 2)
 - 4.7.1. Steps 1 and 2 are designed to help applicants be certain that an NW3 CLT home is an option worth pursuing for them and that they know and understand as much about the limitations and requirements of owning an NW3 CLT home as they do the benefits, before they undertake the more time consuming steps 3 and 4.
 - 4.7.2. The eligibility process will include all minimum financial and local connection criteria to save applicants' time when applying for a home. At this point this does not need to be evidenced.

4.7.3. If the applicant is deemed eligible, they will then be able to complete a full application form (step 3).

4.8. Online form-based assessment (Step 3)

4.8.1. This step will seek to shortlist applicants based on the strength of the application.

4.8.2. This will be an electronic form that requires completion electronically. A physical signature at this stage will not be required but indication that a statement regards the content being true and accurate to their knowledge at the time of submission will be required.

4.8.3. Inconsistencies or errors in high scoring applications, will prompt contact from an NW3 administrator. They will discuss and agree next steps and a timeframe for any additional information or evidence required.

4.8.4. If at any point (by any person) a material omission or misstatement is identified, NW3 CLT reserves the right to exclude the application or withdraw an offer of a unit to the applicant.

4.8.5. A total of 100 points can be scored on the form-based application with the following weighting for each criterion:

Criteria	Form
Housing Need – More suitable (than current) accommodation required	30
Local Connection – Minimum of 5 years connection, in the last 10 years	25
Community Involvement and CLT support – Belonging to and participation in the local community and CLT	25
Finance and Affordability - Priced out of the open housing market and able to afford an NW3 CLT home	20
TOTAL	100

4.8.6. Further detail on scoring within individual criteria will be developed in due course, with the aim of making scoring as objective as possible. The Independent Allocations Panel (IAP) will be provided with guidance in scoring statements for ‘Housing Need’ and ‘Community Involvement and CLT support’.

4.8.7. The three highest scoring applicants for the number of homes and sizes will be invited for an interview, so that there is a balance between creating a reserve list, but not wasting the time of lower scoring applicants with interviews/meetings.

4.9. Attend a meeting for an interview (Step 4)

4.9.1. The shortlisted applicants will be invited to attend a meeting with the Independent Allocations Panel (IAP). The role of the panel will be to verify the scores and to confirm that the selected applicants will contribute to making the 31 Daleham Gardens development a vibrant and functional community.

4.9.2. The Independent Allocations Panel may include NW3 CLT board members but as well as invited third parties outside the CLT and local area.

- 4.9.3. Financial screening will also be carried out by an external body at this stage to verify evidence from applicants.
 - 4.9.4. Households will only be able to submit one application. Where a household with a couple is making an application, both members of the couple will be invited to attend the meeting with the IAP. An applicant will be allowed to bring an advocate to the meeting, where required.
- 4.10. Accept allocation of unit and engage in the contract exchange/sale completion process (Step 5)
- 4.10.1. The applicants selected by the IAP will be allocated a home in accordance to their need (i.e. a one, two or three bedroom property, on the ground floor etc.) They will have the opportunity to express a preference in the application for a particular home but this cannot be guaranteed. If they are not satisfied with the allocation made there may be a further opportunity to swap with another applicant if they are willing, or to withdraw from the application process.
 - 4.10.2. They will then be offered a Memorandum of Sale for a particular unit and be asked to engage solicitors and their mortgage provider in preparation for the contract exchange and sale completion.
 - 4.10.3. In the event of an applicant voluntarily leaving the process or their financial circumstances changing for the worse so that they are no longer able to afford the property, the next suitable candidate on the waiting list will be offered the home.

5. Further work on the Allocation Policy and Process

5.1. The following is out of scope for this draft policy document and will be developed at a later date, subject to planning permission, before the start of the any housing allocation process:

- Allocation for social rented units (likely to follow Camden Council processes)
- Allocation for market sale units (if possible NW3 CLT will seek to sell to long term residents, rather than buy-to-let landlords)
- Financial screening details and agency used (e.g. Censeo)
- The minimum eligibility form
- The application form
- List of evidence types required to satisfy allocation criteria
- Detailed scoring matrix for form and Independent Allocations Panel (IAP), with guidance
- Under and over occupancy policy (with reference to LB Camden policies)
- Legal agreement / contract / lease
- The questions when meeting with the IAP (which would not be published in advance)
- The IAP representatives and conflict of interest statement
- Allocation policy and process for re-sales
- Appeals policy

5.2. The finalised policy will be reviewed by NW3 CLT board at least every three years.

6. Applicants' records and data

6.1. Information given by applicants to NW3 CLT on the application form or on visits or interviews will be treated with the strictest confidence. Information on applicants and their households held within our records are subject to the Data Protection Act 2018 (GDPR). Every care will be taken to keep the information secure and confidential and held only for as long as is necessary for the purpose it is intended for. The data can only be disclosed to relevant third parties provided it is for the purposes of assessing eligibility of applicants. We reserve the right to contact third parties to request information for the purposes of assessing eligibility of applicants.