

ALLOCATIONS POLICY

1. Purpose

- 1.1 Twenty11 was established as a provider of homes in High Wycombe and the surrounding areas in 2018. It is a wholly owned subsidiary company of Red Kite Community Housing Limited (Red Kite) and shares its vision to realise the potential of its communities.
- 1.2 Twenty11 provides homes to a wide range of customers in High Wycombe and the surrounding areas who have a housing need, not just the traditional tenure of socially rented homes. The rental level of these homes includes qualifying rent, discounted rent, exceptional discounted rent and market rent. The rental and ownership products offered by Twenty11 are likely to grow and change to reflect changing demand in the local housing marketplace.
- 1.3 This policy sets out the approach taken by Twenty11 when allocating homes for rent.

2. References

- 2.1 This policy has been drafted in line with our vision and values, relevant legislation and best practice.
- 2.2 This policy has been developed in line with Twenty11's governance regulations and delegation procedures and legislation. As an unregistered provider of housing, Twenty11 is not subject to the regulatory requirements of the Regulator of Social Housing (or any other body which may replace it) but it is subject to Regulation by the Financial Conduct Authority.

3. Responsibilities

- 3.1 The Head of Relationships is responsible for ensuring that this policy is kept up to date and consistent with any new Twenty11 strategies or policies that are related.
- 3.2 It will be reviewed every three years, or following a change in legislation, regulatory requirements or as a result of learning, to ensure that it remains fit for purpose.

4. Legal & Regulatory Framework

- 4.1 Twenty11 is a Community Benefit Society which is registered in England with the Financial Conduct Authority.
- 4.2 All information relating to allocations will be managed in line with data protection laws.
- 4.3 All applications and allocations will take into consideration the Equalities Act 2010 and related guidance.
- 4.4 Renters Rights Act 2025

5. Definitions

- 5.1 **Market rent** is the amount of rent that can be expected for the use of a home, in comparison with similar privately rented properties in the same area. Market rent is the point of comparison for determining the discounted value of a qualifying or discounted rent.
- 5.2 **Qualifying rent** is the rent level that most Twenty11 homes will be advertised at. This rent level is 80% of the market rent.
- 5.3 **Discounted rent** is a rent level that is between 50% and 80% of market rent in the local area for the type of home. Eligibility for a discounted rent from the advertised qualifying rent will be determined by personal circumstances in accordance with the Twenty11 Rent Policy.
- 5.4 **Exceptional discounted rent** is a rent level (with a discount of up to 60% upon market rent) which Twenty11 may consider offering under certain limited circumstances for a period of time for a special reason to a tenant.
- 5.5 **Local Housing Allowance Rent** is the rental level which will apply when tenants are in receipt of Housing Benefit.
- 5.6 An **Assured Tenancy** is the tenancy type offered by Twenty11. It has been introduced to private landlords as part of the Renters Right Act 2025.

6. Key Principles

- 6.1 We will provide a range of housing solutions across the local housing market.
- 6.2 Twenty11 aims to be a strategic partner of the local authority by providing homes for those in housing need.
- 6.3 Our approach to rents, tenancies and housing management will assist some Twenty11 customers to realise their potential.

7. Policy Statement

- 7.1 Twenty11 intends to be a strategic partner of the local authority by providing housing solutions that meet the needs of the local community.
- 7.2 We are responsible for ensuring that our approach to lettings is transparent, fair, non-discriminatory and effectively controlled and monitored. We will take into account the needs of individuals as well as equality and diversity issues.
- 7.3 Twenty11 will provide a range of housing solutions to the local marketplace. The Twenty11 Allocations Policy is therefore considered to be a Local Lettings Policy as it seeks to achieve balanced and sustainable communities with a housing product range tailored to different types of customers.

7.4 Twenty11 is a **digital first landlord**. This means that all of our services are designed to be accessed and delivered online. Tenants are expected to use digital channels as the primary way of contacting us, reporting issues, and accessing services. This approach allows us to provide a consistent, efficient, and modern service to all tenants.

7.5 However, we also recognise that in some cases tenants may not be able to engage digitally due to disability, vulnerability, or exceptional personal circumstances. In line with our duties under the **Equality Act 2010**, we will consider and make **reasonable adjustments** to ensure that no tenant is put at a substantial disadvantage in accessing our services.

7.6 We will let homes for each housing product in the following way:

Market Rent

7.7 Twenty11 owns a portfolio of market rent investment homes. These homes may be let to any customer who expresses a desire to rent the home.

7.8 Homes will be available on a first-come first served basis to customers who demonstrate they can afford to pay the rent for the term of the tenancy agreement, pay the appropriate deposit and do not meet the exclusion criteria set out in this policy.

7.9 Market rent homes will be advertised online in a similar way to other market rent opportunities from other private landlords.

7.10 Market rent homes will be let on a standard Twenty11 Assured Tenancy Agreement Market Rent.

Twenty11 Qualifying and Discounted Rent

7.11 Twenty11 homes will be let on a standard Assured Tenancy Agreement.

7.12 A Twenty11 Assured Tenancy does not offer the same rights, such as preserved Right to Buy or mutual exchange, that are offered by local authority or housing associations. As a result, Twenty11 homes are only open to applications from customers who have not previously been a tenant of Twenty11's parent company Red Kite Community Housing.

7.13 When letting homes at a Twenty11 qualifying or discounted rent we work in partnership with Buckinghamshire Council and other local authorities to provide homes for those in greatest need of housing. Every local authority allocation scheme in England must ensure "reasonable preference" is given to certain categories of applicant as set out in sub-section 166A (3) of the Housing Act 1996. These provide guidelines to Bucks Council in determining who is in greatest need.

7.14 We will mainly advertise homes for Twenty11 qualifying or discounted rent through the sub-regional Choice Based Lettings scheme by which social and affordable housing is allocated throughout Buckinghamshire and other local authority areas.

However, we may choose to use additional or alternative methods to advertise our empty Twenty11 homes where we consider that this will best meet the needs of the community. This may include making a direct offer to an applicant who has been verified as eligible by Twenty11 when we consider it is suitable to do so.

- 7.15 We will sometimes use a sensitive lettings approach to decide how to let properties. Examples of where this approach could be applied to the allocation of properties are where an outgoing tenant has caused a serious nuisance or there has been a high level of recorded incidents of harassment/nuisance in a block or part of an estate or there is a high concentration of vulnerable households in a block, estate or area who may be susceptible to exploitation.
- 7.16 We may choose to advertise some homes as not being eligible for a discounted rent so that we can manage the overall financial viability of individual schemes and Twenty11.
- 7.17 We will endeavour to allocate homes for Twenty11 rent in accordance with the eligibility criteria in the Bucks Home Choice Allocation Policy and this Policy.
- 7.18 We will use the bedroom size criteria in line with the relevant choice-based lettings scheme operating in the area of the home. For example, where homes are offered in the area of operation for Bucks Home Choice, we will allow one bedroom for:
 - i. Adult or Adult couple
 - ii. Any two children of the same sex aged under 18
 - iii. Any two children regardless of sex aged under 10
 - iv. Any other child aged under 18
- 7.19 There may be exceptional circumstances when this size criteria is not met which will be considered on a case-by-case basis.
- 7.20 All applicants must be aged 18 years or over and any that are 16 or 17 years of age may be required to have a guarantor if allocated a property.
- 7.21 We will evaluate the individual circumstances of the nominated applicant and may choose to offer a lower rent than the advertised rent that will allow a customer an opportunity to realise their potential and move to a new rental or ownership product at the end of their tenancy term. This rent may also change during the course of the tenancy depending on the customer's circumstances.
- 7.22 If, when calculating the Discounted Rent, a rental higher than 80% of the market rental is indicated then the applicant will not be offered a discounted rental home. They will be signposted to any available market rental homes.
- 7.23 We require applicants to undergo a pre-tenancy assessment. Where an applicant is unlikely to be able to maintain the tenancy, we may not make an offer or may withdraw the offer of the accommodation unless we are satisfied that a suitable support plan is in place to mitigate the risk.

Exclusion criteria

- 7.24 We are committed to providing high quality rented housing to as many people as possible, however in certain circumstances we may exclude applicants from renting a Twenty11 home. Applicants or tenants who have been excluded in this way have the right to appeal the decision. We reserve the right to exclude applicants' nominees in the following circumstances:
- a) They have previously been a tenant of Red Kite Community Housing;
 - b) They have previously been evicted by Twenty11
 - c) They have previously had a tenancy with Twenty11 and still owe rent or debt
 - d) They have not successfully completed a Twenty11 pre-tenancy assessment.
 - e) They have at any time used a property for illegal purposes and have been evicted for this e.g. sublet, serious criminal activity like cannabis farm;
 - f) They owe rent or other charges or debts to us or another landlord;
 - g) They have been evicted for rent arrears on a previous tenancy, either with a registered provider or private landlord, within the last five years;
 - h) They caused or are causing nuisance and/or annoyance to neighbours or visitors;
 - i) They committed criminal offences in or near the home and may pose a threat to neighbours or the community;
 - j) They have been violent towards a partner or members of the household or their visitors;
 - k) They have demonstrated unacceptable behaviour including being verbally or physically abusive towards a member of staff, contractor or anyone acting on the landlord's behalf;
 - l) They have allowed the condition of their home and any associated areas e.g. garage, shed, garden, patio etc. to deteriorate through neglect or damage;
 - m) They have (or have attempted to) obtain a tenancy by deception, for example, by giving false or misleading information;
 - n) They have paid money to illegally obtain a tenancy;
 - o) They do not qualify for housing e.g. applicants for social housing from abroad who have no recourse to public funds or the right to rent;
 - p) They own or have a legal interest in another property;
 - q) They have lost accommodation provided in connection with employment due to their conduct;

- r) They are unlikely to sustain a tenancy with us, as determined via our financial assessment and/or needs and risk assessment;
- s) They may pose a safeguarding risk to other tenants or their visitors.

7.25 We will evaluate the need to exclude applicants on a case by case basis according to the severity of the situation. For example, we will take into account the timescales, the impact and any other circumstances. The decision to exclude an applicant will require final approval by a Head of Service.

Withdrawal of offer

7.26 In certain circumstances, we reserve the right to withdraw an advert or offer of accommodation. These circumstances may include but not be limited to:

- a. Where an error has been made in the advertising criteria;
- b. When it has been established that the home needs extensive works, which may include adaptations required for a particular applicant (or household member);
- c. Where it is identified that the home is unsuitable for the tenant and/or a member of their household;
- d. Where an applicant has provided false information and has been picked for further investigation via our pre-tenancy assessment;
- e. When the home has been advertised, but the existing tenant has withdrawn their notice;
- f. When the home has been advertised but withdrawn for a direct let for an urgent case.

7.27 Right to Appeal

When writing to you with a decision to not offer a tenancy or to withdraw an offer we will advise you of the reason for our decision. Where we make the decision because the home is unsuitable for you and your household, or due to one of our exclusion criteria you will have the right of appeal.

7.28 You can appeal our decision for the following reasons

- You believe that we haven't taken into account a key piece of evidence already provided
- You believe that reasonable adjustments have not been considered in relation to any disability or medical condition
- There is additional evidence that you consider to be important in making a decision, and you want to send it to us
- You believe we have incorrectly applied our exclusion criteria and can provide evidence to support this

We cannot accept an appeal for any other reason – we know you may not be happy with a decision but unless your appeal is for one of the reasons above we will be unable to consider it.

- 7.29 To appeal our decision, you should contact us and tell us which reason you are using to appeal and provide us with any supporting information. There is a deadline for this, you will need to contact us within 1 working day of our decision, this is because we may already be considering an offer to another household. At this time, you will need to advise us of the reason you are making the appeal. We will also agree with you how long you have to provide any additional information. This will usually be within 2 working days. If an appeal is made outside of this timeframe the home may be offered to another applicant, at which point we would be unable to offer the same home.
- 7.30 We accept an appeal in all the following ways:
- Emailing Lettings@twenty11.co.uk with the subject line – Request to Appeal Decision; or
 - We will ask for you to provide supporting evidence and may need you to send further information in by email.
- 7.32 The appeal will be reviewed by the Empty Homes and Lettings Team Leader, unless they have been involved in the original decision, in which case the appeal will be reviewed by the Head of Relationships or another manager. Our response to your appeal will be sent within 5 working days. In exceptional cases it may take us a little longer to consider the appeal. If this is the case, we will let you know and agree a date when you will have a decision.
- 7.33 As part of dealing with the appeal, we may contact you to ask questions and ensure we have all the right information. Once, the appeal decision has been made there will be no further appeal. If you are unhappy with how we have managed your case, you can make a complaint via our Feedback Policy which is available on our website. However, this will not form an appeal of the decision made.

Document Controls			
Version	4	Effective date	December 2025
Subject matter expert drafter	Head of Relationships	Policy owner	Head of Relationships
Related pod	Relationships	Related policy	<ul style="list-style-type: none"> • Twenty11 Tenancy Policy • Twenty11 Rent Setting Policy • Asset Management strategy • Development Strategy • Twenty11 Anti-Social Behaviour Policy • Twenty11 Complaints Policy
Review period	3 years	Next review due by	December 2028
			YES
The 3 lines of defence have been checked and are valid			<input checked="" type="checkbox"/>
Equality Impact Assessment completed			<input type="checkbox"/>
Delegated approvals			
Approved by ELT	Director of Customer Services	Approved Date	28 th November 2025
Approved by Twenty11 Board	Yes	Approved Date	3 rd December 2025
Approved by Red Kite Group Board	Yes	Approved Date	3 rd December 2025