

Allocations Policy

First approved: 1987
Last Reviewed and amended: March 2001
This Review: February 2004
Amended August 2006 (MC August 2006)
Next Review due: August 2009

Table of Contents:

Page 2	Section 1:	Introduction and Relationship with Performance Standards
Page 3	Section 2:	Association's Aims and Objectives in relation to Allocations
Page 4	Section 3:	Risk Assessment
Page 5	Section 4:	The Association's Housing Stock
Page 5	Section 5:	The Housing Lists
Page 6	Section 6:	Access to the Housing Lists
Page 7	Section 7:	Removal from the Housing Lists
Page 8	Section 8:	Housing Needs Factors
Page 8	Section 9:	The Points System
Page 14	Section 10:	Appeals
Page 14	Section 11:	Confidentiality
Page 14	Section 12:	False Information
Page 15	Section 13:	Legal Requirements and Guidance
Page 15	Section 14:	Accountability and Review
Page 16	Section 15:	Reporting and Monitoring
Page 17	Section 16:	Special Circumstances
Page 17	Section 17:	Translations and Related Media

Allocations Policy

First approved:	1987
Last Reviewed and amended:	March 2001
This Review:	February 2004
Amended	August 2006 (MC August 2006)
Next Review due:	August 2009

1.0 Introduction and Relationship with Performance Standards

1.1 There are three main Performance Standards relating specifically to Allocations.

The first Performance Standard states that:

AS1.1	<i>We ensure that people have fair and open access to our housing list and assessment process. We work with others to maximise and simplify access routes into our housing.</i>
--------------	--

1.2 To comply with this, the Association will annually:

- Assess statistical information on the housing needs in its area of operation
- Assess the allocations made and consider what will become available in the following year
- Review the Policies and Procedures in place including consultation with appropriate agencies such as neighbouring housing providers
- Ensure that the full Allocations Policy is sent to the agencies consulted after review, and to Communities Scotland
- Review publicity material to ensure good quality information on allocations, including the Allocations Policy in summary form, is available for all applicants
- Consider the Allocations Policy in light of the Association's Equal Opportunities Policy
- Maintain an open waiting list.

1.3 The second Performance Standard states that:

AS1.2	<i>We let houses in a way that gives reasonable preference to those in greatest housing need; makes best use of available stock; maximises choice; and helps to sustain communities.</i>
--------------	---

1.4 To comply with this standard the Associations will:

- Adopt appropriate procedures and ensure open and transparent audit trails
- Ensure staff are well trained in the Allocations Policy and Procedures
- Ensure that details on how to complain if dissatisfied are well publicised
- Consider the Allocations Policy in light of the Associations Equal Opportunities Policy

1.5 With regard to creating balanced communities, Yorkhill believe that the provision of rented housing is paramount to this principle, as the wider area is dominated by owner occupation. The ability to influence this is, however, limited given the lack of development opportunities.

1.6 The Association strives to ensure that a balance is achieved between the needs of different applicants and the maintenance of a sustainable community

1.7 The Association examines the demand for the area along with the housing management needs of the estate and ensures that there is a breadth of applicants offered accommodation which includes:

- Waiting list applicants
- Homeless referrals
- Referrals from voluntary organisations
- Transfers

1.8 The third Performance Standard states that:

AS1.3 *Tenancies – We offer the most secure form of tenancy compatible with the purpose of the housing. The agreement makes clear the rights and duties of the tenant and landlord. We act to uphold these rights and duties in a fair and responsible manner.*

1.9 To comply with this, the Association will:

- Where it is appropriate tenants will be signed up to a Scottish Secure Tenancy Agreement
- Housing Staff will ensure that all new tenants are made aware of the type of tenancy agreement they are signing and their rights under that agreement.
- Tenants will be made aware of their landlord's rights and duties to them as a tenant.
- However, where an applicant has been the subject of an Anti-Social Behaviour Order (ASBO) a Short Scottish Secure Tenancy may be offered

2.0 Association's Aims and Objectives in relation to Allocations

2.1 Yorkhill Housing Association operates in a tight knit, multi-cultural area in the West End of Glasgow, and aims to provide good quality, affordable rented housing to those in greatest housing need. This can be summed up in the following mission statement to which the Association subscribes:

“Yorkhill Housing Association (1988) Ltd aims to improve the quality and variety of social and private housing within its area of operation by the continual provision of effective affordable rented accommodation and property management services.”

- 2.2 The ability to achieve our aims with regard to allocating void properties is subject to the number and type of houses the Association has available at any one time.
- 2.3 The Policy will seek to deal with a number of housing needs including people who are homeless, living in poor housing conditions, suffer from chronic medical conditions, or from any form of harassment.
- 2.4 In addition, the Association aims to provide a source of housing for voluntary groups who may refer applicants.
- 2.5 Yorkhill Housing Association is an Equal Opportunities Association and will abide by all relevant and appropriate legislation in fulfilling this duty.
- 2.6 The following equal opportunities statement applies to all areas of the Association activity:

Yorkhill Housing Association will treat all individuals or groups of individuals equally, avoiding discrimination on any grounds in relation to service delivery, opportunities or employment

- 2.7 To help fulfil its commitment to equal opportunities, the Association will collect and monitor records on the ethnic/racial origin, age, gender, and disability of all those applying for housing.
- 2.8 The Association’s Equal Opportunities Policy is available on request.

3.0 Risk Assessment

- 3.1 The risks to the Association with reference to the Allocations Policy can be summarised as follows:
- Allegations of corruption if the process is not fair, equitable, and transparent.
 - Loss of rental income, and risk of vandalism and disrepair if void properties are not allocated quickly.

- 3.2 To minimise these risks, the Association's Allocations Policy will:
- be clear on points and priorities
 - ensure that where the use of discretion is appropriate the justification for such use is recorded in the applicant's file.
 - have a clear commitment to fairness and equality
 - have rights of appeal at all stages of the process
 - ensure that void procedures and lettings timescales are clear and tight, with planned action if void properties are left for a period of time
- 3.3 The Association is regulated by Communities Scotland, In terms of the Housing (Scotland) Act 2001, the allocation of tenancies to current or former employees or Committee members, or their close relatives, will only be made in accordance with published guidance.

4.0 The Association's Housing Stock

- 4.1 The Association owns and manages around 334 improved and new build houses for rent. This is made up of 2, 3, 4 and 5 apartment properties which include sheltered housing, amenity and wheelchair housing.
- 4.2 The Association's stock is imbalanced with regard to size, with 60% one bedroom or less, 33% two bedrooms and only 7% three bedrooms or more.

5.0 The Housing Lists

- 5.1 Because of the size and type of accommodation, at the Association's disposal when it becomes available, the Association can only be of assistance to a limited range of household sizes.
- 5.2 The Association has a low turnover of houses, approximately 20 - 30 flats per annum.
- 5.3 Given the imbalance in our stock, applicants will only be put on the list for houses applicable to their household size, using the following criteria:
- 1 bedroom for the applicant and spouse/partner if applicable
 - 1 bedroom for an applicants child
 - 1 bedroom for each 2 children of mixed genders under 10 years of age
 - 1 bedroom for each 2 children of same gender under 16 years of age
 - 1 bedroom for each other person aged 16 years of age or over
- 5.4 However, in exceptional circumstances applicants, perhaps for a medical condition, may be allowed to under occupy by one bedroom.

5.5 Applicants with children who do not stay with them on a permanent basis may be considered for larger accommodation if they are able to demonstrate that appropriate residency arrangements are in place that shows the child/children can be considered a permanent part of the household.

5.6 The Association will maintain separate housing lists for its rented housing consisting of:

- 1 apartment (single person)
- 2 apartment
- 3 apartment
- 4 apartment
- 5 apartment
- Sheltered Housing (2 and 3 apartment only)
- and Transfer Lists (separated into apartment sizes as above)

5.7 Applicants will be placed on the appropriate list for the size of house required for the household composition stated on the application form.

6.0 Access to the Housing Lists:

6.1 There is a continuous opportunity for those in housing need to apply and be assessed.

6.2 Applicants for housing must be at least 16 years of age, with the exception of Sheltered Housing applicants who must be 60 years of age or over.

6.3 Any applicant will be able, with one or more individuals, to apply for a joint tenancy. All joint tenants will be jointly and severally responsible for all their responsibilities under the tenancy, including payment of rent.

6.4 The Association has agreed a joint protocol with Glasgow City Council allowing referrals of applicants who are assessed as homeless under the terms of the Homeless Persons Act

6.5 The Association will provide both temporary and permanent accommodation for homeless people upon the request of the Council as part of its statutory duty to secure permanent accommodation under the homelessness legislation. The Association will comply with these requests unless we have a good reason not to.

6.6 Any dispute arising from this arrangement will be resolved either through the dispute process agreed with the Council or through the use of an Arbiter

6.7 The Association may also agree referral arrangements with voluntary or other agencies who specialise in providing support to particular groups of people.

- 6.8 The Association will provide assistance to tenants who wish to exchange with a tenant of the Association or a tenant of another social landlord in terms of our mutual exchange procedures
- 6.9 In terms of Schedule 7 of the Housing (Scotland) Act, 2001 the allocation of tenancies to current or former employees or Committee members or their close relatives will only be made in accordance with published guidance.
- 6.10 The Association wants applicants to have a realistic understanding of their chances of re-housing. This will vary, depending on the supply and demand of each house type.
- 6.11 Where possible, the Association will try to provide applicants with information, on the likelihood of rehousing them, in a house of their choice. This will be based on the recent turnover of such properties.
- 6.12 The Association will take no account of any debts which do not relate to the tenancy of a house where the applicant has been a tenant. Neither will we take account of any arrears which are equal to or less than 1/12 of the annual rent or service charge.
- 6.13 The Association will not normally allow a tenant to transfer, or an applicant to access our waiting lists if they owe more than one month's rent or service charge to the Association or another Registered Social Landlord, unless there is an appropriate arrangement to pay outstanding debts, and this arrangement has been maintained for the previous three months.
- 6.14 If denied access on any of the above grounds, the applicant has the right of appeal through the Association's Complaints Procedures.

7.0 Removal from the Housing Lists:

- 7.1 Applicants will be removed from the list under the following circumstances:
- If an applicant fails to respond to periodic Housing list reviews within any specified time periods.
 - For the Sheltered Housing List, applicants who are not fit for independent living as assessed by a suitably qualified person.
- 7.2 Applicants may be removed from the list under the following circumstances:
- Applicants discovered by the Association to have a history of anti social behaviour.
 - Applicants who attempt to intimidate the staff of the Association by using threatening and abusive behaviour.
 - Applicants discovered to have given false information in order to gain access to the housing list.

7.3 Removal under 7.2 will be the decision of the Association's Housing Manager who will inform the applicant in writing, including details of the reasons for the decision.

7.4 If removal under 7.2 the applicant can appeal to the Association using our Complaints Procedure.

8.0 Housing Need Factors

8.1 The basic criteria used by the Association for assessing housing need are as follows:

- Housing conditions where the applicant currently resides i.e. lack of amenities; sharing of facilities; overcrowding/under-occupation; poor condition of property such as dampness and serious disrepair.
- Other factors which prevail whereby a move would benefit the applicant i.e. medical and social factors and disability; children or older people at height in high rise properties; no security of tenure; racial harassment; victims of domestic abuse.
- Homelessness- As assessed by the Council as being homeless or potentially homeless under the Act.

8.2 To ensure that every applicant is treated fairly, and the policy is open and transparent, the Association uses a points system to allocate its houses in a clear, understandable and effective manner.

9.0 The Points System

Section A: General Needs Applicants

The following Housing Needs factors and points will be used:

9.1 A: Homelessness:

Applicants who consider themselves homeless or potentially homeless will be referred by the Association to the City Council's Community Casework Services for assessment.

The Association will consider Section 5 referrals from the Community Casework team.

The Association will meet its obligations to combating Homelessness through this system.

9.7 B: Racial Harassment:

Applicants suffering racial harassment where they cannot reasonably be expected to live in their current accommodation will be awarded **25 points**

9.8 The Association is committed to a victim centred approach, and although evidence from the police, legal adviser or another relevant organisation will be sought, the Housing Manager will use his/her discretion in finding a quick solution to the harassment problem while awaiting details from these other sources.

9.9 Applicants will also be advised to contact relevant agencies for support and the City Council for assessment as potentially homeless. This will allow the applicant to maximise their opportunities for re-housing with a range of housing providers.

9.10 C: Domestic Abuse:

Applicants suffering domestic abuse (both physical and mental) where they cannot reasonably be expected to live in their current accommodation **25 points**

9.11 The Association is committed to a victim centred approach, and although evidence from the police, legal adviser or another relevant organisation will be sought, the Housing Manager will use his/her discretion in finding a quick solution to the abuse problem while awaiting details from these other sources.

9.12 Applicants will also be advised to contact relevant agencies for support and the City Council for assessment as potentially homeless. This will allow the applicant to maximise their opportunities for re-housing with a range of housing providers.

9.13 D Other Circumstances

9.14 Applicants, who, in the opinion of the Association, are experiencing distressing circumstances where they cannot be reasonably expected to live in their current accommodation **25 points**

9.15 The Association is committed to a victim centred approach, and although evidence from the police, legal adviser or another relevant organisation will be sought, the Housing Manager will use his/her discretion in finding a quick solution to the abuse problem while awaiting details from these other sources

9.16 Applicants will also be advised to contact relevant agencies for support and the City Council for assessment as potentially homeless. This will allow the applicant to maximise their opportunities for re-housing with a range of housing providers.

- 9.17 Where points have been awarded for Racial Harassment or Domestic Abuse, or Other Circumstances, then no other points will apply from the points system apart from medical or social points depending on the individual circumstances
- 9.18 It will be the responsibility of the applicant to keep the Association informed of any new addresses and change of circumstances.
- 9.19 Lacking Security:
- Applicant living care of friends or relatives (not parent(s)) **5 points**
 - Applicants sharing accommodation with a resident landlord **5 points**
 - Applicant living with parent(s) who wishes his or her own accommodation. **5 points**
- 9.20 Points will be awarded for only one of the above categories
- 9.21 Other relevant housing needs points can be added from the appropriate categories detailed below.
- 9.22 Lack of Amenities:
- No fixed bath or shower, no inside W.C., no hot water **15 points**
 - A means of cooking, but no means of washing dishes within a bed-sit or no alternative kitchen facilities **2 points**
- 9.23 Sharing Facilities:
- Sharing kitchen facilities only or bathroom facilities only with one household **6 points**
 - Sharing both kitchen and bathroom facilities with one household **8 points**
 - Sharing kitchen facilities only or bathroom facilities only in houses for multiple occupation **9 points**
 - Sharing both kitchen and bathroom facilities in houses for multiple occupation **12 points**
- 9.24 Poor Condition of Existing Property:
- Where the property suffers from:
- Minor defects e.g. minor dampness **2 points**
 - Severe dampness **4 points**
- 9.25 Points under this category will be awarded initially without inspection by the Association. However no offer of accommodation will be made until the facts have been established.

9.26 Overcrowding:

For each bedspace in present accommodation:

- Required for a child under 10 years of age **3 points**
- Required for persons between 10 and 16 years of age **5 points**
- Required for an adult over 16 years (couples count as one) **7 points**
- Property where kitchen area is within living room **2 points**
- Property which has a galley kitchen (defined on application form) **1 point**

9.27 The following criteria will be used to assess the suitability of present accommodation under these categories:

- A single bed space / bedroom will not be less than 5 square metres
- A double bedroom will not be less than 9 square metres

Requirements for bed spaces are calculated as follows:

- One bedroom for two persons living as partners
- One bedroom for up to two children of the same gender over 10 years of age
- One bedroom for up to two children regardless of gender under 10 years of age
- One bedroom for each adult member of a household over 16 years of age

The kitchen and living room in each property will be excluded from the calculation of bed spaces.

9.28 The Association may not award these points under this category if it is established that deliberate overcrowding has taken place to worsen the applicant's housing conditions.

9.29 Under Occupation:

- For each bedroom surplus to requirements **7 points**

9.30 The award of these points can be used to increase the availability of larger houses within the Association's stock. These points can be awarded to the Association's tenants seeking smaller accommodation.

This improves the use of the Association's houses in meeting the needs of applicants who are living in overcrowded conditions.

The award of these points to a waiting list applicants contributes to the City's overall Social Housing Strategy

9.31 Medical Factors:

Where existing accommodation is unsuitable due to a medical condition, points will be awarded as below:

- If re-housing to appropriate accommodation is the only way to ensure the applicant can experience ordinary living **12 points**
- If the applicant's present housing conditions are causing a deterioration in their medical condition and re-housing to more suitable accommodation will ease their condition. **6 points**

9.32 Support Factors:

- Applicants who need the support of, or have to support, someone living in one of the Associations areas of activity on provision of confirmation supporting the facts from an appropriate person e.g. doctor, social worker etc. can be awarded a further **5 points**

9.33 Where a previous applicant has been awarded points under this category, and they and the person they are supporting remains in the area, no further points will be awarded to any new applicant.

9.34 For the purposes of awarding points under this category, the applicants must live outwith the area.

9.35 Other Factors:

- Children (under 16) living in high rise flats
(5th Floor or above) **5 points**
- Applicants over 60 living in high rise flats
(5th Floor or above) **5 points**

Section B: Transfer Applicants

9.36

Tenants of the Association may apply to go on the transfer list, provided they have an element of housing need, as outlined in this allocation policy

- 9.37 However, existing tenants could be considered for re-housing within Yorkhill under the **local moves category** as a means of making sensible use of current housing stock and meeting local housing needs. For every property allocated to a local move, the Association receive a void back in return, which can then be passed to another applicant on the waiting list. This is particularly useful in cases where applicants are living in overcrowded 1 and 2 apartment flats and require a move to larger 2 or 3 apartment flats in the area.
- 9.38 Where an applicant is a separating partner due to relationship breakdown and is a joint tenant, any joint tenancy rights must be relinquished.
- 9.39 The Association may not award points to a transfer applicant if it is established that deliberate steps have been taken to worsen their housing conditions.
- 9.40 A tenant will not be considered for a transfer if they come to the top of the list and they have more than one month's arrears and have not made a suitable arrangement to clear these arrears. The Association will bring this to the applicants attention.
- 9.41 Transfer applicants will be awarded points in the same way as all other applicants in accordance with this allocation policy and points system.

Section C: Sheltered Housing

- 9.42 The allocation of sheltered housing is different from mainstream in that the criteria used are more of the social/ medical nature rather than housing need.

It is therefore not let on a strictly points system but more on the suitability of the applicant to sheltered housing and vice versa. This requires a careful assessment of each applicant and a judgment on the above criteria.

It is beneficial to introduce an element of local moves for people within Yorkhill who meet the appropriate criteria. This would allow the applicants to remain within the community and would free up mainstream flats for relet to other suitable candidates.

Section D: Management Transfer

- 9.43 This process will be used where, because of prevailing circumstances, the transfer of the tenant to other accommodation is an urgent necessity.

Such action will require the authority of the Housing Manager and the Director based on the individual circumstances in each case. Given that should such circumstances exist the transfer needs to be 'managed' rather than an allocation made, the award of points would be inappropriate.

- 9.44 Any case of Management Transfer will be the subject of an individual report to the Management Committee specifying the reasons and justification for such action.

10.0 Appeals Procedures

- 10.1 If an applicant disagrees with any decisions made on their application, for example, the number of points they have been allocated, or if they feel that the Housing Management section have misinterpreted the Association's published policy, they should utilise the Complaints Procedure to have their case reviewed.

11.0 Confidentiality

- 11.1 The Association respects the confidential nature of information given by applicants and their representatives, and will not discuss applications with anyone other than the applicant (or a representative supporting an application e.g. doctor, social worker, support worker) unless instructed in writing to do so by the applicant.
- 11.2 The Association is also registered on the Data Protection Register, and will respond under the terms of the Data Protection Act 1998 to any request made in writing from an applicant to see any information stored in our computer systems applicable to them
- 11.3 The Association will also give applicants access to any personal files held on them at no charge in compliance with the Access to Personal Files Act (1987).
- 11.4 In seeking information from applicants for monitoring purposes under our Equal Opportunities Policy, the Association confirm that such information will be treated in strictest confidence, and will not be used for any other purpose than that for which it was collected

12.0 False Information

- 12.1 The Association treats as seriously the provision by an applicant of false or misleading information or the withholding of vital information, in order to fraudulently enhance their application.
- 12.2 Applicants may be refused offers of accommodation; or have an offer withdrawn, should the above be shown.

- 12.3 Applicants should also note that if after becoming an Association tenant, evidence of deception in obtaining the tenancy is uncovered, then the Association may take action to recover the tenancy on the grounds of false information being given in obtaining the tenancy

13.0 Legal Requirements and Guidance

- 13.1 The Association will comply with all relevant legal requirements affecting the Allocations of houses, with particular reference to the *Housing (Scotland) Act 2001* the Housing (Scotland) Act 1987, Race Relations Act 1976, Matrimonial Homes (Family Protection) (Scotland) Act 1981, Sex Discrimination Act 1975 and amended Act 1986, the Discrimination Disability Act 1995, Data Protection Act 1998, Access to Personal Files (1987) and the Housing Association Act 1985 (particularly Section 15 *now Section 7 under the 2001 Act*), and any subsequent amendments to these Acts.
- 13.2 Summaries of the issues relating to allocations within these Acts can be found in *SEDD Circular 1/2002 Housing Lists and Allocations*.
- 13.3 With regards to Section 7, the Association may now grant a tenancy to Employees, Committee Members, former employees, former committee members, and close relatives of the aforementioned, provided that the tenancy is being granted in accordance with Guidelines laid down by *Communities Scotland*.
- 13.4 The Association will also take account of all relevant guidance relating to Allocations produced by *Communities Scotland* and the Scottish Federation of Housing Associations, and in particular to *Raising Standards for social landlords and homeless functions: Activity Standards 1: Housing Management*; the Chartered Institute of Housing's Good Practice Manual; and the Code of Conduct - Equal Opportunities (in conjunction with the Housing Action Equality Unit, now Positive Action in Housing).

14.0 Accountability and Review

- 14.1 Yorkhill Housing Association is responsible to its members, its tenants and the community that it serves.
- 14.2 Responsibility is then given by the above to their representatives, who are the Management Committee and have ultimate responsibility for the efficient running of the Association including the adoption of this Allocations Policy.

- 14.3 With regard to this Policy, delegated authority is given by the Management Committee to the Association's staff to oversee the efficient running of the Allocations process within the terms of this Allocations Policy. They are also delegated to put forward proposed changes to the Policy, but any changes will need the authority of the Management Committee prior to them coming into effect.
- 14.4 The Allocations Policy document is therefore not seen as static, and may need adapted to meet changing circumstances.
- 14.5 This Policy will therefore be fully reviewed every three years although minor amendments may be made if considered necessary at any time between reviews.
- 14.6 In addition changes may be required to this policy to comply with the law, guidance or an improvement, where it would not be appropriate to wait until the next programmed review.
- 14.7 When reviewing the Policy the Association will:
- Assess statistical information on the housing needs in its area of operation
 - Assess the allocations made and consider what will become available in the following year
 - Review the Policies and Procedures in place including consultation with appropriate agencies such as local social rented housing providers, and ethnic minority and other special needs groups
 - Ensure that the full Allocations Policy is sent to the agencies consulted after review, and to Communities Scotland.
 - Review publicity material to ensure good quality information on allocations, including the Allocations Policy in summary form, is available for all applicants
 - Consider the allocations process in light of the Associations Equal Opportunities Policy

15.0 Reporting and Monitoring

- 15.1 The Association's Housing Management Staff will provide quarterly reports to the Audit Sub - Committee on the outcomes of the Allocations Policy, including timescales for allocating void properties and void rent loss.
- 15.2 In addition, 6 monthly reports will be given on Equal Opportunities monitoring which includes matters relating to Allocations such as applicants applying for, being accepted or rejected from the Housing Lists.

16.0 Special Circumstances

- 16.1 Although the Association has attempted to cover all circumstances in this Allocation Policy, it is recognised that there may be cases where the allocations policy does not cover an applicants particular circumstances.
- 16.2 Should this occur, in the opinion of the Housing Management staff, the applicant's circumstances may be brought to the attention of the Management Committee to decide on appropriate course of action.
- 16.3 In this case, the approval of the Association's Director to put the case forward must be sought by the Housing Manager, prior to the case being put forward to the Management Committee.
- 16.4 This may then lead to the Management Committee **in exceptional circumstances** giving priority to the applicant for an offer of accommodation as a special case.
- 16.5 As part of the presentation of the special case to the committee, the Housing Manager must outline where and how the Association's allocations policy could not be used to resolve the applicant's housing needs. This must be followed by a recommendation as to whether or not the policy needs to be amended and improved to take account of such circumstances.

17.0 Translations and Related Media

- 17.1 The Association will make available copies of its full Allocations Policy on tape and in translation into other languages and media **where appropriate**.
- 17.2 In the event of an applicant requiring the use of an interpreter, whether due to language or other communications problems (such as signing for applicants with hearing difficulties), the Association will organise this for the applicant.