Assessing the consequences of welfare reform

April 2014
Housing Committee Members

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The Committee agreed the following terms of reference for this investigation on 12 September 2013:

• To consider the housing impacts of welfare reform, particularly on mobility, overcrowding, quality and rent levels at both borough and pan-London levels;

• To explore any emerging patterns and London boroughs’ response;

• To evaluate mitigating actions taken by both the Mayor and London government to date; and

• To identify what further mitigating action could be taken by both the Mayor and London government.

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The map shows the relative growth and contraction in the number of households in receipt of the Local Housing Allowance (LHA) category of housing benefit between April 2011 and November 2013, by Lower Super Output Area. The darkest blue wards have seen the greatest increase in LHA claims, whereas the lighter blue wards have seen a fall, or little or no change, in the number of LHA claims.

Change in LHA recipient households:

- 15 to 128 (1,110)
- 6 to 15 (1,276)
- 0 to 6 (1,174)
- -164 to 0 (1,205)
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Foreword

One in four Londoners receives housing benefit to help pay the rent. The Government’s changes to the welfare system could have profound and far reaching consequences for almost a million households, making them by far the biggest housing policy changes brought in during this Parliament.

Housing benefit is not just a safety net for people who lose their job. It also ensures that pensioners, people with disabilities and those in low paid jobs, who between them comprise the majority of the caseload, can afford to live in many parts of London.

In the months after the Government’s changes were announced, the Mayor of London lobbied for concessions. His key aim was “to allow those families who are in particular need, who needed to live near their place of work, or keep the kids in school, to have special circumstances” so that they could stay put.

Following his widely publicised remarks about “Kosovo-style social cleansing”, he assured the London Assembly that he had secured concessions and extra funding to protect Londoners. We have set out to test whether he has achieved that. We have paid particular attention to affordability and access to accommodation; the movement of households within and out of, London; and rising homelessness and the increased use of temporary accommodation.

There has been no large-scale and sudden movement of households from London. But we have heard evidence of a range of problems including more evictions and rising homelessness. Councils are having more difficulty finding affordable accommodation for their residents, and the number of people being moved out of their borough or out of London altogether is rising.

These findings are only provisional. Some effects won’t really be understood for years. Tensions between rent levels and benefit caps could slowly but surely transform the social mix in the capital, or they could ease with minimal impacts. Rising homelessness may be an inevitable consequence of the reduced benefit allowances, or a temporary problem to be solved by other housing policies. There are
further changes that haven’t yet been introduced, and temporary measures that will be withdrawn in future years.

Given this, we believe that the Mayor and the Government should do more to review the impact of these changes, and to adapt the welfare system to ensure that it can still fulfil its fundamental purpose: to ensure that those at risk families or households on very low incomes that need the support can continue to live in London.

Darren Johnson AM
Chair, Housing Committee
Executive summary

The Government has introduced a radical package of welfare reforms which is likely to have an impact on many thousands of households across the capital. The likely consequences of the reforms are contested and hard evidence is only now beginning to emerge.

The report sets out and assesses available data in three key areas: affordability and access to accommodation, particularly in the private rented sector; movement of households within and out of London; and rising homelessness and the increased use of temporary accommodation.

One in four, or approximately 843,000 households, in London receive housing benefit to cover all, or some, of their housing costs. The number of housing benefit claims in London has increased in recent years, with growth particularly marked for the private rented sector tenant households, who make up a third of the total number of claimants. It is London’s high housing costs and the more recent downward pressure on wages that explains the high proportion of London’s households in receipt of housing benefit.

The Government expected that housing benefit reform would stabilise or even reduce rent rises. But the evidence so far is ambiguous: snapshot data indicates that rents are increasing significantly each year, but one Office for National Statistics (ONS) index highlighted a slowdown in rent increases.

The report finds some evidence that landlords are increasingly cautious in renting to those tenants that receive housing benefit. The buoyancy of the rental market expands the options available to landlords and can prompt some to withdraw properties from the housing benefit market. The increase in the number of assured shorthold tenancies that are terminated prematurely is a worrying trend, as is the rise in statutory homelessness in London since the start of the reforms.

The Government has recognised London’s higher housing costs within the reformed welfare system by providing additional support across some parts of London, and local authorities are working proactively with landlords to try and sustain tenancies where they may be considering termination or non-renewal of a tenancy. The Mayor should regularly review the additional support that London receives to ensure they accurately reflect London’s rental market.
The report also finds evidence of claimant household movements within individual boroughs and in particular to Outer London. Often, these households live in the private rented sector. Managed moves can lead to a positive outcome where households have firm employment opportunities and/or family networks in their new location; where this is not the case, such a move can be stressful and destabilising. Welfare reform is also adding to the incremental change in the composition of communities in London, with some evidence of increasing concentration of housing benefit claimants in particular areas.

Local authorities have been able to use transitional funding, so-called discretionary housing payments, to mitigate some of the impact of the reforms. They have used these payments to help vulnerable families, perhaps by preventing an eviction, or by supporting a household where someone is on course to enter work. While there is a clear case for continuing to provide this kind of support, funding in 2016/17 and beyond is uncertain. The Mayor should make the case for future support loudly.

The report highlights a further worrying trend with an increase in the number of people who are accepted as statutorily homeless by their local authority. Coupled with a shortage of suitable accommodation, this has led to competition between local authorities, which is pushing up costs and increasing the number of households placed in bed and breakfasts or other temporary accommodation. The Mayor should seek additional mitigation for these households.

The report’s findings are necessarily provisional. Not all of the reforms have been fully implemented nor across all of London. Important transitional support is still, for now, available, so further change is likely over the coming years. Our focus is on the role of the Mayor, who has stated his support for the reforms but also sought to mitigate some of the more negative impacts on vulnerable families. We therefore set out a series of recommendations to ensure that London does not receive disproportionate impacts as a result of the Government’s welfare reforms.
1. London and the impact of welfare reform

1.1 One of London’s distinguishing features is that different income groups live alongside each other. Mixed tenure, mixed income neighbourhoods have developed in the city supported by investment in low-cost housing and financial support for housing costs. This diversity lends a specific character both to local neighbourhoods and to the city more generally. This is in stark contrast to many other global cities.

Housing benefit in London

1.2 Housing benefit (HB) has increasingly become the means by which lower income households can live in many parts of the city. Currently, one in four, or approximately 843,000 households, in London receive housing benefit to cover all, or some, of their housing costs. And the housing benefit caseload grew by roughly 40 per cent in the decade up to 2013. In 2012/13, housing benefit expenditure in London was over £6 billion (total expenditure for England was over £21 billion).

1.3 The number of housing benefit claims in London has increased in recent years (see chart 1). Growth has been particularly marked for private rented sector tenants, households living in Outer London and those making non-passported claims – i.e. those who are not claiming other forms of income support – and who are more likely to be from people in employment than passported claims. Almost one-third of the current housing benefit caseload – around 280,000 households – are private sector tenants. London’s high housing costs, and more recent pressure on wages and other living costs, are the reasons for the higher proportion of Londoners in receipt of housing benefit, including those in work.
Some London boroughs have many more housing benefit claimants than others. Over one quarter of households in 18 London boroughs receive housing benefit. In Inner London, this proportion is highest in Hackney (over 41 per cent), and in Outer London in Barking & Dagenham (over 33 per cent). And there are differing proportions of housing benefit claimants living in the social and the private rented sectors across boroughs. Historically, claimants in Inner London have been more likely to live in social housing, whereas roughly half of claimants living in Outer London live in the private rented sector (PRS) - see chart 2.

Chart 2: In Inner London, a greater proportion of housing benefit claimants are in the Social Rented Sector

Source: DWP, November 2013.
Recent welfare reform

1.5 In light of the rising costs of housing benefit, both the current and previous governments have pursued programmes of welfare reform. There has been a particular emphasis on reducing the costs of claimants living in the private rented sector.

1.6 The current government’s welfare reform programme seeks to ensure a fairer approach to housing benefit to bring stability to the market and improve incentives to work. The reforms that the Housing Committee has reviewed through this investigation are as follows:

- new rates, upper limits and limited annual uprating for local housing allowance (LHA);
- the overall benefit cap;
- the social sector size criteria; and
- increased funding for discretionary housing payments.

These are described in Appendix 2.

1.7 The Committee has also heard evidence on the direct payment of housing benefit to tenants living in social housing, which is currently being piloted in Southwark. The Committee has already highlighted the risk to Housing Associations’ income streams of potentially higher rates of rent arrears in its June 2013 report on Housing Associations. Nevertheless, the Government intends for direct payment to become the default payment method under Universal Credit.

1.8 The Government recognises that changes to housing benefit will have particular consequences for London. Its impact assessments for Local Housing Allowance reform and the Welfare Reform Act 2012 acknowledge this. In preparation for the reforms, London boroughs have also been explicitly planning for a disproportionate impact, such as Bromley, Kensington & Chelsea and Newham. London’s higher housing costs result in higher housing benefit payments, so attempts to limit or cap payments will inevitably affect Londoners more.

1.9 Recent data has identified a disproportionate impact on London:

- over 15,340 London households were initially subject to the overall benefit cap. This was almost half (approximately 47 per cent) of the UK total.
- a cumulative total of 17,102 households have been subject to the cap in London up to December 2013.
Approximately 52,000 households are affected by the social sector size criteria with an average weekly reduction of housing benefit payment of £20. 42,000 households have seen a reduction of £15 or more, a greater number than in any other region (see chart 3).

Chart 3: The number of households with a weekly housing benefit reduction of £15 or more is greatest in London

The Mayor’s response to the reforms

1.10 The Mayor has clearly stated his overall support for the Government’s welfare reform programme. On 28 October 2010 he said:

“My consistent position has been that the government is absolutely right to reform the housing benefit system which has become completely unsustainable. I do not agree with the wild accusations from defenders of the current system that reform will lead to social cleansing.”

1.11 The Mayor also stated, however, that “Where people have put down roots and where they have family obligations such as sending their kids to school I think you have got to be very, very careful… I do not think… it is conservatism to say to people, ‘We are going to have a policy of uprooting you from your home in short order.’”

1.12 The Mayor has acknowledged that some households may have to move out of London should their household income fall below a level that enables them stay. But he also warned that Londoners in receipt of welfare support should not be “driven out of their homes in large numbers.” The Mayor has also said that he hopes to maintain the diversity of London’s neighbourhoods and avoid additional pressure on
school places (for example, if households move from Inner to Outer London).\textsuperscript{15}

1.13 To this end, the Mayor has secured some additional support for some families. As he told the Assembly in June 2011 “\textit{What we have done is successfully lobby...to allow those families who are in particular need, who needed to live near their place of work, or keep the kids in school, to have special circumstances.”}

1.14 Initially, the Mayor also set out his plans to monitor and mitigate any disproportionately negative impacts of welfare reform. He intended to:

\begin{itemize}
\item be represented at regular meetings between the Deputy Mayor for Housing, Land and Property, London boroughs and government departments;
\item be part of efforts to secure additional discretionary housing payment funding for London boroughs;
\item monitor the impact of welfare reform to ensure that Londoners are not disproportionately disadvantaged, particularly the impact on families and maintain a ‘homelessness dashboard’;
\item establish any impact of welfare reform on Mayoral objectives on house-building and homelessness;
\item lobby for support for families who do not want to relocate due to special circumstances;
\item advocate on behalf of boroughs should they face significant difficulties in implementing reforms; and
\item avoid unintended consequences on women living in refuges.\textsuperscript{16}
\end{itemize}

1.15 The Committee heard that the GLA is not directly monitoring reforms in terms of both their impact on London and the Mayor’s Housing Strategy, although the Mayor has previously asked the ONS to explore whether it would be possible to publish data on the gross flow of claimants between local authority areas. Indeed, the Deputy Mayor for Housing and Land has more recently argued that it is too early to draw conclusions on how welfare reforms are affecting housing and the Mayor’s housing priorities.\textsuperscript{17}

1.16 The Committee acknowledges the challenge in assessing the impact of reforms when individual responses and behaviour vary, including across ostensibly similar households.\textsuperscript{18} Indeed, emerging qualitative data from the g15-commissioned \textit{Real London Lives} study indicates that comparable households in comparable situations are reacting very differently. Furthermore, the DWP has noted that discretionary housing payments
have ‘blunted’ the immediate impact of reforms, making it harder to assess their likely longer-term consequences.

1.17 There is limited national monitoring of the regional impact of reform. The Government does not publish regionally-focused monitoring of reforms and does not specifically monitor the impact of reforms on London’s housing sector. Indeed, a number of respondents voiced their concerns about the apparent failure at a national level to assess the combined impact of national welfare and housing policies, particularly where they appear to be working against each other.¹⁹

1.18 It therefore falls to London government to establish the impact of reforms on London. We welcome London Councils’ Tracking welfare reform workstream and the regular reports emerging from it.²⁰ But inevitably, this work will not cover every aspect of reforms and is focused on the consequences for boroughs and their residents, rather than the consequences for the Mayor’s commitments, responsibilities and programmes.

1.19 The Mayor is required to pay due regard to equality of opportunity in London at a strategic level. The disproportionate impact of welfare reform on these groups is a further reason for the Mayor to step up his monitoring of their impact. The Mayor has recently stated that GLA officers ‘are keeping abreast of the monitoring work being carried out by the DWP, DCLG, the Local Government Association, the National Housing Federation, London Councils, Crisis and the Joseph Rowntree Foundation.’²¹ We would therefore expect the Mayor to analyse these reports for evidence of any particular effects on London and make public this assessment.

**Recommendation 1**

**The Mayor** should publish regular monitoring data on the impact of welfare reforms against his housing priorities, including the risk for investment partners and potential opportunities.

**The Mayor** should publish regular monitoring data on the impact of welfare reforms on London’s households, including a disaggregation by tenure and equality group.
2. **Assessing the evidence**

2.1 Welfare reform will have a range of direct and indirect consequences, which will affect different parts of the capital. Three key issues have emerged during our evidence gathering that are particularly relevant to London as a whole. These are: affordability and access to accommodation, particularly in the private rented sector; movement of households within, and out of, London; and rising homelessness and increased use of temporary accommodation.

### Affordability and access

**Key findings**

There is a widening gap between benefit payments and market rents in the capital.

Landlords are increasingly cautious in renting to housing benefit tenants. Shorthold tenancies are being terminated at an alarming rate.

We welcome the Government’s recognition of London’s higher housing costs within the reformed welfare system. Additional funding for some claimants renting in the private sector is a positive, if partial, recognition of London’s specific situation.

Direct payment of the rental element of Universal Credit is a significant risk for social landlords.

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**Changes to Local Housing Allowance**

2.2 Across London, one-third of claimants, approximately 280,000 households, now live in the PRS. And this is increasing. The lion’s share - two-thirds – of new claimants privately rent.22

2.3 Housing benefit is available to people on a low income to help them to meet their housing costs, both for people in work and out of work. Housing benefit can be used to pay all, or part of, a household’s rent, depending on their income and circumstances. There is no set amount of housing benefit, though there are certain limits.
2.4 Local Housing Allowance (LHA) is the mechanism by which councils determine the levels of housing benefit for private rented sector tenants (see box). The Government has taken a number of policy decisions to limit LHA expenditure.

2.5 From April 2011:

- LHA rates were capped at the 30th percentile of rents, rather than the median;
- new LHA maximum rates were applied where the 30th percentile exceeds these limits;
- the four bed LHA rate became the maximum LHA rate; and
- the shared accommodation rate was extended to under 35 year olds (this formerly applied to under 25 year olds).

2.6 Additionally, from April 2014:

- Most LHA rates will be calculated in relation to a one per cent uplift, rather than the previous uplift of the Consumer Price Index (CPI); and
- Under the Targeted Affordability Funding, a selected list of rental areas will be calculated in relation to a four per cent uplift.

**How Local Housing Allowance (LHA) is calculated**

LHA rates depend on Broad Rental Market Areas (BRMAs). BRMAs are areas of residential accommodation within which a person could move and still have access to similar services of a similar standard. There are 14 BRMAs in London. Rent officers at the Valuation Office Agency set LHA rates on an annual basis. To determine most LHA rates, the lower of these two figures will become the new LHA rate:

- the 30th percentile of rents in a Broad Rental Market Area; or
- the current LHA rate plus an uplift of one per cent.

To determine LHA rates in BRMAs exempted by the Targeted Affordability Funding, the lower of these two figures will become the new LHA rate:

- the current LHA rate plus an uplift of four per cent; or
- the maximum LHA rate for each accommodation type.
2.7 The maximum LHA rates have a much greater impact in central and Inner London than the rest of the country. The table below sets out the LHA rates for central and Inner London from April 2014. The rates that are capped by these limits are highlighted in bold.

<table>
<thead>
<tr>
<th>Broad Rental Market Area</th>
<th>Room</th>
<th>1 Bed</th>
<th>2 Bed</th>
<th>3 Bed</th>
<th>4 Bed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Central London</td>
<td>£131.27</td>
<td>£258.06</td>
<td>£299.34</td>
<td>£350.95</td>
<td>£412.89</td>
</tr>
<tr>
<td>Inner East London</td>
<td>£98.16</td>
<td>£254.80</td>
<td>£299.34</td>
<td>£350.95</td>
<td>£412.89</td>
</tr>
<tr>
<td>Inner North London</td>
<td>£94.07</td>
<td>£258.06</td>
<td>£299.34</td>
<td>£350.95</td>
<td>£412.89</td>
</tr>
<tr>
<td>Inner South East London</td>
<td>£91.52</td>
<td>£196.23</td>
<td>£255.09</td>
<td>£318.00</td>
<td>£412.89</td>
</tr>
<tr>
<td>Inner South West London</td>
<td>£90.75</td>
<td>£244.06</td>
<td>£299.34</td>
<td>£350.95</td>
<td>£412.89</td>
</tr>
<tr>
<td>Inner West London</td>
<td>£106.29</td>
<td>£233.83</td>
<td>£299.34</td>
<td>£350.95</td>
<td>£412.89</td>
</tr>
</tbody>
</table>

2.8 The national upper limits mean that LHA rates for large parts of the capital are set below the 30th percentile of market rents, and in some cases far below. Also, LHA rates are set on an annual basis, despite London’s rapidly-evolving market. The Residential Landlords Association has voiced a particular concern about the consequences of the limited rise in LHA rates subject to the one per cent uplift.

2.9 In addition, within the LHA reforms, the Shared Accommodation Rate (SAR) is severely limiting the scope of affordable accommodation for those aged under 35. For example, Crisis recently conducted a snapshot survey of PRS accommodation advertised in Lewisham over the course of one week. They found that only six rooms in the whole of the borough were affordable and available for SAR claimants.
The Shared Accommodation Rate of Local Housing Allowance

The Shared Accommodation Rate (SAR) is the level of housing benefit that applies to single people in the private rented sector who are aged under 35. It is deemed to be an appropriate rent for a room in a shared property. This rate applies even where claimants live in a self-contained property.

Rent levels

2.10 Since housing benefit claimants account for an increasing proportion of private sector renters, the Government hopes to stabilise or reduce rent rises for such properties by capping LHA rates. The intention is to suppress the cost of rented accommodation available to benefit claimants in high cost areas.

2.11 London’s private rental market is particularly buoyant. One body of evidence suggests that Local Housing Allowance reforms are not generally driving rent reduction and that in fact rents are still increasing at a rapid pace. Boroughs, London Councils and many organisations have used Valuation Office Agency (VOA) snapshots of London rents to point to recent increases as high as eight or even 14 per cent per year. And they do not expect this trend to change in the short-term. We heard cross-party agreement from borough representatives that this is the case.

2.12 However, the ONS’s experimental Index of Private Housing Rental Prices has calculated much lower annual rent increases of 1.6 per cent in the capital, thus providing some evidence that rents are increasing at a significantly lower rate.

2.13 Other data indicates that where there are reductions in LHA expenditure in London, these appear to be driven principally by claimants moving to cheaper properties, rather than landlords reducing rent.

2.14 Early findings from DWP research were that 94 per cent of the cuts fell on tenants, with only 6 per cent coming from landlords reducing rents, with discretionary housing payment (DHP) blunting the spatial impacts of the reform, as it was intended to do. DWP noted that there may be informal arrangements where landlords are turning a blind eye to those tenants unable to meet the full rent payment, at least for the remainder of their current tenancy, and that it may take time for market rents to adjust to the change.

2.15 It is clear that there is no accepted single data source on rent level trends. Policy-makers therefore need to cite evidence sources responsibly, being
clear on their strengths and weaknesses. A more reliable approach may be to focus on the rent levels for properties that are available as new tenancies and how rents at the lower end of the market compare to LHA rates in the capital.

2.16 Regardless of how high the increases are, rising rents present challenges to individual households, boroughs, housing providers and landlords. We heard from a wide range of stakeholders that increasing pressure on rents and the welfare changes are driving a rise in arrears.31 Centrepoint also highlighted that young people are having to pay £10-12 per week on top of their housing benefit payments and are subject to increasing landlord discretion.32

2.17 Therefore, the Committee welcomes the Government’s provision of additional support for areas with particularly high housing costs. The Government has set aside £45 million in the Targeted Affordability Fund to allow LHA rates to be calculated in relation to a four, rather than one, per cent uplift in areas of particularly high housing costs.33

2.18 The Targeted Affordability Fund currently applies to half of the LHA rates in London. Therefore, there may be further scope in the future to recognise the particular challenge presented by London’s rental market.

Access

2.19 As well as rising rents, tenants are facing a shortage of properties which are available to housing benefit claimants. There is evidence that landlords are increasingly cautious about renting to HB claimants:

- A DWP study of the LHA reforms found that the majority of landlords, and particularly buy-to-let landlords, said they were more cautious of letting to housing benefit tenants for various reasons, including the LHA measures;34

- A recent Residential Landlords Association survey of landlords identified that 74 per cent of surveyed landlords in London were more reluctant to rent to housing benefit claimants;35 and

- An initial evaluation of the impact of the benefit cap in Haringey identified concerns over the cap and other welfare reforms as leading to landlords withdrawing from letting to benefit claimants.36

2.20 We heard of two principal ways that landlords are exiting the housing benefit market: by withdrawing properties once the tenancy ends or terminating assured shorthold tenancies (AST) prematurely. On the
latter, there has been a four-fold increase in the number of assured shorthold tenancy terminations since 2010, rising from 300 to over 1,400 per quarter (see chart 4). Not only is the absolute number increasing, an increasing proportion of statutory homelessness is caused by AST termination.

Chart 4: Termination of Assured Shorthold Tenancy is increasing as a reason for loss of last settled home

Source: DCLG; GLA Homelessness Dashboard.

2.21 Additionally, we were particularly concerned to hear reports that landlords are increasingly wary of renting to households in receipt of housing benefit to cover part, rather than all, of their housing costs (the rest would be covered by earned income).37 The proportion of in-work housing benefit claims in London is likely to increase, or at least remain high as long as annual rent increases continue to outstrip earnings growth.

2.22 In future, there may be mitigating factors in the form of Universal Credit (UC). We heard that the DWP believes UC offers an opportunity to reduce stigma, as it will eventually encompass income support, tax credits and housing benefit. Landlords should not be able to specifically identify HB claimants from within the wider UC cohort.38 although given the level of information requested from new tenants it is not clear whether this will be the case in practice.
2.23 But at the same time, under UC the default position will be to pay the rental element of UC directly to the tenant. Evidence from piloting of direct payment points to higher rent arrears, including a nine per cent increase in council rent arrears for the Southwark pilot. Landlords are likely to consider this another disincentive to providing further housing for housing benefit claimants. The direct payment pilots have been extended and the issue of increased arrears should be addressed before wider roll-out of UC. Direct payment to landlords may still be undertaken in some cases, for example where the claimant is deemed vulnerable, but the Government has not defined in regulations who should be considered vulnerable or the circumstances in which direct payment to a landlord may take place. In the UC pathfinder, a two-month trigger is being used to pay landlords directly when tenants fail to pass over the housing costs element of their benefit.

2.24 The consequences of reform require boroughs to adapt and develop innovative approaches within their housing programmes and services. London Councils told us that boroughs are working proactively with private sector landlords to facilitate moves to the PRS, or importantly, sustain tenancies where landlords are considering termination or non-renewal of a tenancy. One example is the London Borough of Lambeth which has introduced pre-eviction panels that seek to test whether every step has been taken to support a tenant with their arrears or debt. A referral to a debt service for an affordability assessment and some budgeting or debt support are key parts of this pre-eviction offer.

**Recommendation 2**

The Government should ensure LHA rates are regularly reviewed and properly take account of the higher costs in London.

The Mayor should ask the Government to regularly review the Local Housing Allowance Targeted Affordability Fund to ensure that sufficient numbers of areas of London are receiving assistance.

The Mayor should lobby the Government to ensure that the category of ‘vulnerable’ claimants, whereby rents will continue to be paid directly to landlords, is defined broadly and includes tenants with complex credit and debt problems.
Household movement

Key findings
Welfare reform is adding to incremental change in the configuration of different household types and communities in London.

There are increasing spatial concentrations of housing benefit claimants within individual boroughs and in Outer London. This is particularly true for households living in the PRS.

Movement of households is most likely to lead to a good outcome where households have firm employment opportunities and/or family networks in their new location.

Household movement within London

2.25 When faced with a shortfall in housing benefit, households may need to pick one of these options: move to a more affordable area, stay in the same area but compromise on quality or other living expenses, or seek new or better employment opportunities. The London Borough of Hackney highlighted how households staying put may remain or place themselves intentionally in overcrowded accommodation, particularly where they have strong links to the local community and/or employment.43

2.26 For the last 15 years, there has been an emerging change in the distribution across the capital of low-income households, including those claiming LHA. A rising number of LHA claimants are living in Outer London. Evidence indicates that recent LHA reforms in particular are accelerating this change as a growing proportion of London becomes unaffordable to those in receipt of LHA. As a result, housing benefit claimants are becoming increasingly clustered in certain parts of the capital.

2.27 To assess the extent of this trend, London Councils has compared the distribution of LHA claims in London in 2011 and 2013. Growth of LHA claims is dramatically reducing in Inner London and increasing in Outer London.44 On implementation of the reforms, LHA claims reduced first in west Inner London, but a decline in claims subsequently spread into other parts of Inner London. For example, there have been significant drops in boroughs such as Westminster and Kensington and Chelsea, and significant increases in Outer London boroughs. Representatives from
Sutton and Croydon confirmed an increased migration of households to their boroughs—principally from Inner London, but also from neighbouring Outer London boroughs with more buoyant rental markets.45

2.28 Boroughs also report large shifts in LHA claims within their own boundaries. For example, in Camden in April 2013 there were 174 fewer households claiming LHA in the seven most southern wards and 189 more LHA-claiming households in the three north-western wards than in April 2011.46 These shifts present a significant change to the spread of communities within boroughs, affecting both planning for local service provision and diversity within boroughs.

2.29 There is, however, evidence to indicate a welcome increase in people taking employment since the benefit cap was introduced. This may also reflect the work that local authorities are doing to support people back into work.47

*Household movement out of London*

2.30 The majority of household movement and shifts in the proportion of HB claims currently appears to be contained within London. The Inter-borough Accommodation Agreement48 tracks households placed by London boroughs. We were told that to date, 95 per cent of households have been placed within the capital and five per cent have been placed outside of the capital.49

2.31 However, five per cent is still a significant figure and it is clear that London boroughs are facilitating movement out of London. For example some boroughs are awarding discretionary housing payments to assist households to move out of London. The London Borough of Newham told us that the ability to place households affected by the benefit cap out of borough was sometimes a necessary means of finding them affordable accommodation.50 We also heard that some households are volunteering to move out of London to areas where they have existing family links or know of firm employment opportunities.51 It would seem logical that these moves are more likely to engender positive outcomes.

2.32 Recent figures suggest that the rate of households being placed out of London has more than doubled. In the first quarter of 2012/13, just 113 homeless households were placed outside London. In the first quarter of 2013/14, this figure rose to 259 (a 129 per cent increase).52

2.33 Recent figures also show an increase in the number of families with children of school age placed outside of the capital. The Mayor made a
number of specific pledges to ensure that families with children in school or other reasons for needing to can stay in their neighbourhood.\textsuperscript{53} Figures obtained through Freedom of Information requests covering 23 boroughs found that 222 families with children of school age had been placed outside of London from April to December 2013, compared with 21 in the whole of 2010/11. Some boroughs have also been using Discretionary Housing Payments to help families with children move out of London\textsuperscript{54}. At present, data on movements within and outside London broken down by different household types is not published by the Government, London Councils or the GLA.

\section*{The impact of household movements}

\subsection*{2.34}
The consequences of moving within, or out of, London will vary according to individual households and circumstances. We heard repeated concerns about the impact this can have on families, particularly in terms of their ability to access schools and caring networks.\textsuperscript{55} The child poverty campaign, 4 in 10, reported instances where parents have lost their jobs since moving house; they had been unable to manage the additional travel time required to continue taking children to school in their former area and their employment commitments. Inclusion London, a London-wide organisation for disabled and deaf people, and the Salvation Army told us how moving house can reduce access to effective social care and employment support for disabled people and people with mental health problems.\textsuperscript{56}

\subsection*{2.35}
Households may also make an active decision to move, prompted by a number of factors. Habinteg, a housing association with a particular focus on providing accessible homes for disabled people, identified the ‘postcode lottery’ of local discretionary support for those affected by the social sector size criteria, acting as a barrier to mobility within the capital. Households are unable to predict the discretionary support that would be made available in their new borough.\textsuperscript{57}

\subsection*{2.36}
There has been significant media and political attention on reports of movements within and out of London. The Committee believes that London Councils and the Mayor have a joint responsibility to set out the pan-London situation in relation to household movements. As already noted, the Mayor had previously committed to exploring with the ONS and DWP whether it would be possible to publish data on the gross flow of claimants between local authority areas.\textsuperscript{58}
Recommendation 3

The Mayor and London Councils should produce an assessment of the impact on movement of claimant households within, and out of, London, and publish regular monitoring data.

Discretionary housing payments

Key findings
Given the disproportionate impact of welfare reforms in London, discretionary housing payments play a crucial role in mitigating this impact.

Boroughs welcome the ability to allocate discretionary housing payments variably but this creates uncertainty and a lack of transparency for claimants.

2.37 In recognition of the need to provide transitional support to tenants struggling to meet their housing costs, the Government has provided discretionary housing payments (DHPs). This is a pot of funding which councils can use to award extra support to tenants in addition to welfare payments. This is intended to be transition funding to support tenants into a position where they no longer need this support – it is not designed for permanent support. Councils must return any unspent DHP to the Government at the end of each financial year.

2.38 The Mayor was involved in successful efforts to increase the DHP allocation for London during implementation of the reforms. The amount of money allocated to London boroughs has increased considerably (see table). The Mayor also sought to ensure that the DHP guidance for local authorities included disabled people living in adapted homes and children and young people in education as two priority groups for awards.
### London’s Discretionary Housing Payment allocations (£ millions)\(^{60}\)

<table>
<thead>
<tr>
<th>Year</th>
<th>Amount (£ millions)</th>
</tr>
</thead>
<tbody>
<tr>
<td>2010/11</td>
<td>4.5</td>
</tr>
<tr>
<td>2011/12</td>
<td>8.2</td>
</tr>
<tr>
<td>2012/13</td>
<td>20.3</td>
</tr>
<tr>
<td>2013/14</td>
<td>56.5</td>
</tr>
<tr>
<td>2014/15</td>
<td>51.6</td>
</tr>
</tbody>
</table>

2.39 Councils allocate DHPs by reference to a national framework, which advises local authorities to award them ‘fairly, reasonably and consistently’.\(^{61}\) Because DHP funding is limited, councils have had to make choices and, in some cases, have found it hard to comply with these principles. In effect, they need to ration DHPs and make choices about priority tenants. DHPs have therefore been used to support households to maintain their current tenancies, for example disabled people living in accessible homes; those affected by the social sector size criteria; households in arrears; and households being supported into employment. DHPs have also been used to assist households move by paying for deposits and rent advances.

2.40 Councils have often been cautious in how they award DHPs, and have not always spent all of the money they have been allocated. Indeed according to the Deputy Mayor for Housing, Land and Property only four out of the 33 boroughs had spent 50 per cent of their DHP allocation at the six-month stage.

2.41 Concerns have been raised regarding the choices boroughs have made on awarding DHPs. It is not, sometimes, clear why one household is awarded DHPs and another has been refused. The way funding has been allocated varies both between boroughs and within individual boroughs, for ostensibly comparable households.

2.42 Despite these concerns about local variability, boroughs are keen to maintain a locally-led process. They argue this is fundamental to DHP being awarded according to local need and they offer a defence for DHP spending in 2013/14 being particularly varied for a number of reasons: their discretionary nature, delayed implementation of some reforms and uncertainty over future need.\(^{62}\) The Committee accepts that boroughs should lead on allocating DHPs, but calls on them to establish a greater level of predictability.
2.43 The Government recently announced the DHP allocations for 2014/15. Inner London will receive £22.8 million and Outer London £28.8 million. Overall, this is £5 million less than the overall 2013/14 award. The DWP is also aiming to better publicise the range of support available including discretionary housing payments, home swapping services or to get into employment.

2.44 The funding position for DHP from 2016/17 onwards is more uncertain. The Autumn Statement 2013 allocated an increase of £40 million to DHP funding for 2015/16. Any future reduction in the DHP budget (potentially returning to an amount comparable to the pre-reform national budget of £20 million), is likely to increase the level of conditionality and discretion applied to DHP awards. The Committee was therefore told that it was “essential” that the Mayor lobbies for significant DHP funding beyond 2015/16. Indeed, the Deputy Mayor for Housing, Land and Property highlighted how it was better for local authorities to have the funding allocated at the start of the year and return any unspent money, rather than have insufficient funds to meet genuine need.

2.45 Despite the positive role that DHPs can play, they are designed to be time-limited and to offer transitional relief. While it is welcome that boroughs are concerned to support priority groups, the transitional nature of DHPs means they are not a permanent vehicle for providing additional long-term assistance to those who may be considered to have a long-term ‘enduring need’. For example, they might be unsuitable for a disabled person living in significantly adapted accommodation, subject to the social sector size criteria, and for whom a move may be impractical and/or costly in the short- to medium-term.
Recommendation 4

The Mayor should continue to make the case for significant discretionary housing payments funding for London boroughs. There is a particular opportunity to influence this when the government decides on both the overall budget and individual allocations for discretionary housing payments for 2016/17.

London Councils should work with boroughs to ensure that there is sufficient monitoring and transparency over how boroughs are allocating their discretionary housing payments, that boroughs are allocating these payments in the most effective and sustainable way and that best practice is shared.
Homelessness and temporary accommodation

Key findings
Competition between boroughs to procure temporary accommodation has reached unsustainable levels pushing up costs.

A shortage of suitable temporary accommodation has led to an increase in the number of households placed in bed and breakfasts.

Difficulties in sourcing suitable PRS accommodation is limiting boroughs’ recently-acquired power to discharge their homelessness duties into this sector, leaving households in temporary accommodation for longer periods.

Delays in ‘move on’ for individuals from supported accommodation to independent tenancies risks further inertia within the sector.

Homelessness

Statutory homelessness appears to be increasing. In the last quarter of 2010, there were 2,542 local authority acceptances of statutory homelessness in London; in the last quarter of 2013, there 4,346 (see chart 5).

Chart 5: Local authority acceptances of statutory homelessness in London have increased in recent years

Source: DCLG; GLA Homelessness Dashboard.
Homelessness organisations voiced their concerns about people affected by the extension of the Shared Accommodation Rate (SAR). The SAR should cover the cost of a room in shared accommodation. Previously, this rate was paid to under-25s on the basis that people of that age would expect to live in shared accommodation. The rate has now been extended to under-35s – the expectation being that they too should live in shared accommodation. London Councils have analysed the decline of both under-25s and 25-34 year olds receiving the SAR rate of LHA. There is a concern that a portion of this cohort are ‘disappearing from the system’. This concern is accompanied by a reported increase in the number of homeless people under 35.

Temporary accommodation

Due to shortages in available settled homes, councils are likely to place homeless households in temporary accommodation (TA) while they seek a settled home (see the box below). Living in temporary accommodation is broadly considered to be disruptive to people’s daily lives, and can affect their ability to move into employment.

What is temporary accommodation?
Temporary accommodation should be ‘suitable’ for the household and could be a bedsit, flat or house; or a place in a hostel or bed and breakfast. Families with dependent children or pregnant women should only be placed in bed and breakfast accommodation in an emergency and their stay should not exceed six weeks. TA could be run by a council, housing association, private landlord or third sector organisation. Tenants pay rent for temporary accommodation, and where eligible can receive housing benefit to assist with this.

The use of temporary accommodation had been declining in London since 2005 when it peaked at almost 65,000 households. In the last two years, there has been an increase in demand for places. Since the start of 2013, just over 40,000 households in London have been in temporary accommodation (see chart 6). London accounts for the majority of TA used across the country: it has almost three-quarters (73 per cent) of the households living in TA in England.
2.50 In order to meet their homelessness duties, London boroughs can have no choice but to offer households temporary accommodation outside of the borough. Use of this option has been rising: 11,134 households were in out-of-borough TA in the last quarter of 2013 – more than double that in the last quarter of 2010 (see chart 7). In Outer London boroughs particularly, there has been a marked rise in the proportion of out-of-borough placements: affecting around 4,000 households per quarter during 2013.
Central and local government have recognised the need to reduce TA use. Both the current and previous Mayor supported the previous government’s objective to halve TA use in the capital, but this target was narrowly missed in London. More recently, the current government has taken action to help boroughs access more affordable TA. The Localism Act 2011 allows local authorities to discharge their homelessness duty by offering a minimum 12-month PRS tenancy for suitable accommodation irrespective of the household’s agreement. The intention was to reduce local authorities’ need for more expensive nightly accommodation.

Despite these efforts, boroughs are facing increased difficulties in sourcing affordable temporary accommodation. The shortage of accommodation is exacerbated by TA being subject to the overall benefit cap. These and other factors mean that boroughs are increasingly competing over an ever-diminishing supply of PRS homes that landlords will let as TA. We heard from the London Borough of Hackney that boroughs “are effectively gazumping each other” in the search for TA.

This can result in increased use of expensive B&B accommodation, including for families with children. For example, we heard from the London Borough of Hackney that the limited TA supply is increasing reliance on expensive nightly accommodation. This additional pressure can result in a significant draw on central contingency funds. For example, Bromley has recently noted how meeting homelessness duties
has moved from ‘largely cost neutral’ sourcing of TA to the majority of TA placements now only being secured on a nightly paid basis at a net cost to the council. The borough therefore recently decided to allocate £1 million from a central contingency fund this year and allocated £1.2 million for 2014/15. It had established the fund to mitigate the unknown extent of the impact of reforms.⁷¹

2.54 Boroughs are also developing alternative approaches to addressing the specific issue of temporary accommodation supply. For example, the London Borough of Croydon is offering to become the named tenant for TA tenancies, offering a higher level of reassurance for landlords and a slightly lower rent than the open market. Hackney is also now looking to create its own TA stock.⁷² The borough acknowledges that a permanent stock of temporary accommodation is a “kind of contradiction”, but the borough hopes this increase will stabilise TA supply, thereby helping to keep costs down.

Supported housing

2.55 We heard concerning reports that the supported housing sector is facing additional difficulties in providing their services within the reformed welfare system. Supported housing is available to homeless people, combining both housing and other support services to help them to address any underlying difficulties and behaviour. Services aim to develop service users’ practical skills and capacity to maintain an independent tenancy.

2.56 At the Committee’s December seminar, a number of supported housing providers reported that they were finding it more difficult to move people through from supported accommodation to their own tenancies. Providers stated that this was due to a combination of limits and caps on benefit rates and the existing limited availability of private-rented accommodation in London’s buoyant market. The extension of Shared Accommodation Rate to people under 35 was also cited as having a significant negative impact.⁷³ For example, the Peter Bedford Housing Association reported that the organisation knew of only one person who had moved into a studio in the PRS with a rent below the new limit.⁷⁴ Supported housing clients who move out of borough are generally not able to access their current borough’s welfare assistance scheme, for example to assist them with paying a deposit. This is causing further delays in move-on.

2.57 This is the subject of a separate Housing Committee investigation which will report in spring 2014.
Recommendation 5

The Mayor should seek additional mitigation for households placed in temporary accommodation that are subject to the overall benefit cap.

The Mayor should also seek an exemption from direct payments for those in temporary accommodation, to minimise the risks to social and private landlords.
Appendix 1 Recommendations

Recommendation 1
The Mayor should publish regular monitoring data on the impact of welfare reforms against his housing priorities, including the risk for investment partners and potential opportunities.

The Mayor should publish regular monitoring data on the impact of welfare reforms on London’s households, including a disaggregation by tenure and equality group.

Recommendation 2
The Government should ensure LHA rates are regularly reviewed and properly take account of the higher costs in London.

The Mayor should ask the Government to regularly review the Local Housing Allowance Targeted Affordability Fund to ensure that sufficient numbers of areas of London are receiving assistance.

The Mayor should lobby the Government to ensure that the category of ‘vulnerable’ claimants, whereby rents will continue to be paid directly to landlords, is defined broadly and includes tenants with complex credit and debt problems.

Recommendation 3
The Mayor and London Councils should produce an assessment of the impact on movement of claimant households within, and out of, London, and publish regular monitoring data.

Recommendation 4
The Mayor should continue to make the case for significant discretionary housing payments funding for London boroughs. There is a particular opportunity to influence this when the government decides on both the overall budget and individual allocations for discretionary housing payments for 2016/17.

London Councils should work with boroughs to ensure that there is sufficient monitoring and transparency over how boroughs are allocating their discretionary housing payments, that boroughs are allocating these payments in the most effective and sustainable way and that best practice is shared.
Recommendation 5

The Mayor should seek additional mitigation for households placed in temporary accommodation that are subject to the overall benefit cap.

The Mayor should also seek an exemption from direct payments for those in temporary accommodation, to minimise the risks to social and private landlords.
## Appendix 2: Summary of recent housing benefit reforms

<table>
<thead>
<tr>
<th>Date</th>
<th>Reforms</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>April 2011</strong></td>
<td>New rate and upper limits for Local Housing Allowance (LHA) for private sector tenants</td>
</tr>
<tr>
<td></td>
<td>• Limiting LHA awards to the 30th percentile of local rent levels, rather than the median;</td>
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<td></td>
<td>• Introducing new maximum rates for different household sizes (applied where the 30th percentile is higher)(^1)</td>
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<tr>
<td></td>
<td>• The four bed rate became the maximum LHA payment, even where household share more than four bedrooms</td>
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<tr>
<td></td>
<td>• The extension of the Shared Accommodation Rate (SAR) up to 35 year olds (previously 25) for single people without dependents</td>
</tr>
<tr>
<td><strong>April – Sept 2013</strong></td>
<td>The overall benefit cap</td>
</tr>
<tr>
<td></td>
<td>• Limiting overall entitlement to welfare support to £500 per week for couple and single parent households and £350 for single adult households. Where individuals exceed the cap, their housing benefit will be reduced accordingly</td>
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<tr>
<td><strong>April 2013</strong></td>
<td>New size criteria in the social rented sector</td>
</tr>
<tr>
<td></td>
<td>• Limiting the number of bedrooms covered by housing benefit payments</td>
</tr>
<tr>
<td></td>
<td>• Introducing a 14 per cent reduction in housing benefit payments for residents deemed to be over-occupying by one bedroom and a 25 per cent reduction for those over-occupying by two bedrooms or more</td>
</tr>
<tr>
<td></td>
<td>• Including an exemption to allow the size criteria to take account of the need for overnight carers who do not live in a property full-time</td>
</tr>
</tbody>
</table>

\(^1\) From April 2014 LHA weekly payable rate are capped at:
- £258.06 for one room in shared accommodation
- £258.06 for one bedroom exclusive use
- £299.34 for 2 bedroom accommodation
- £350.95 for 3 bedroom accommodation
- £412.89 for 4 bedroom accommodation
| From April 2011 | • Alongside these reforms and reductions, the Government has increased the funding available for local authorities to offer discretionary housing payments. An increased allocation was initially made in response to LHA reforms and then increased again on introduction of the benefit cap and social sector size criteria |
| April 2014 | • Uprating most LHA rates annually by one per cent for two years  
• Uprating LHA rates for selected areas by four per cent (subject to the upper limits) |
Appendix 3: How we conducted the investigation

Written submissions

1. Peter Bedford Housing Association
2. Affinity Sutton
3. Camden Citizens Advice Bureau
4. Centrepoint
5. Crisis
6. Habinteg
7. Inclusion
8. London Borough of Camden
9. London Borough of Hackney
10. London Borough of Lambeth
11. London Borough of Newham
12. National Housing Federation
13. Residential Landlords Association
14. Salvation Army

Informal evidence-gathering seminar

12 December 2013 with the following speakers:

- Andrew Parfitt, Head of Housing Policy, Department for Work and Pensions

- Toby Nutley, Head of Housing Research, Department for Work and Pensions

- Simon Latham, Executive Director of Community Living, London Borough of Sutton, representing the London Councils Housing Directors Forum

- Mairead Carroll, Head of Policy and External Affairs, East Thames (to discuss Real London Lives, a g15-commissioned research project)

- Susan Fallis, Assistant Director of Services, Broadway
Other participants included representatives from London boroughs, housing providers from the social and private sector, advice and advocacy charities, and third sector providers.

For a summary note see item 6: https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=302&Mid=5087&Ver=4

**Formal Committee meeting**

12 February 2014 with the following guests:

- Councillor Karen Alcock, Cabinet Member for Property & Housing Services, London Borough of Hackney
- Councillor Jayne McCoy, Chair of the Housing, Economy and Business Committee, London Borough of Sutton
- Councillor Dudley Mead, Deputy Leader (Statutory) (Capital Budget and Asset Management) and Cabinet Member for Housing, London Borough of Croydon
- Richard Blakeway, Deputy Mayor for Housing, Land and Property, Greater London Authority
- Jamie Ratcliff, Assistant Director – Programme, Policy and Services, Housing and Land, Greater London Authority

For the transcript see: https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=302&Mid=5087&Ver=4
Endnotes

1 DWP, November 2013
2 DWP, Benefit expenditure by region 1996/97 – 2012/13
3 The chart excludes 2,201 households in Westminster where the tenure is unknown.
4 Housing Associations and the Delivery of Affordable Housing, Housing & Regeneration Committee, June 2013.
9 DWP, November 2013
10 DWP, data up to December 2013
11 DWP, data up to November 2013
12 Mayor’s Question Time, November 2010
13 See Mayor’s Question Time, 21 November 2012
14 Mayor’s Question Time, 13 July 2011
15 Mayor’s Question Time, 15 June 2011
16 These commitments were made in response to Mayor’s questions at Mayor’s Question Time meetings or in written responses.
17 Housing Committee, 12 Feb 2014
18 Housing Committee, 12 Feb 2014
19 Housing Committee, Informal seminar, 12 December 2013; Housing Committee, 12 Feb 2014
20 http://www.londoncouncils.gov.uk/policylobbying/welfarereforms/
21 Response to Mayor’s Question 2014/1242, 26 February 2014
22 London Councils, Presentation at Housing Committee, Informal seminar, 12 December 2013
23 London Councils, Presentation at Housing Committee, Informal seminar, 12 December 2013
24 Residential Landlords Association (RLA), Written submission
25 Crisis, No room available: study of the availability of shared accommodation, 2012
26 Centre for London, Stressed: A review of London’s private rental sector, August 2013; Housing Committee, 12 February 2014
27 VOA; London Councils; Housing Committee, Informal seminar, 12 December 2013; Housing Committee, 12 Feb 2014
28 Housing Committee, 12 Feb 2014
29 ONS experimental private rental index; LSL
70 Housing Committee, Informal seminar, 12 December 2013; LB Newham, Written submission, Housing Committee, 12 Feb 2014
71 LB Bromley, Homelessness and temporary accommodation budget pressures: Homelessness (Impact of recession/welfare reform) contingency provision drawdown, 20 November 2013
72 Housing Committee, 12 Feb 2014
73 Housing Committee, Informal seminar, 12 December 2013; Camden CAB; Peter Bedford HA; Centrepoint; Crisis; RLA
74 Peter Bedford Housing Association, Written submission
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