

LONDON ASSEMBLY

November 2025

Housing Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into allocations of social housing.

Calls for Evidence are open to anyone to respond to. In September 2025, the Committee published a number of questions related to its investigation, which can be found on page 2. The Call for Evidence was open from 5 September to 31 October 2025.

Contents

Questions asked by the Committee	2
Barnet Council / Ref No. 001	3
Black Equity Organisation Ref No. 002	8
Centre for London / Ref No. 003	12
Coffee Afrik CIC / Ref No. 004	20
Councillor Leo Pollak / Ref No. 005	22
Crisis / Ref No. 006	23
G15 / Ref No. 007	29
G15 Resident Group / Ref No. 008	39
Harrow Council / Ref No. 009	43
Merton Council / Ref No. 010	45
Prof Katherine Brickell, Isabel Kaner, Sam Pratt, Amanda Roestorf, Dr Rosalie Warnock / Ref No. 011	47
Prof Katherine Brickell, Dr Mel Nowicki, Fraser Curry (King's College London) / Ref No. 012	55
Royal Borough of Kensington and Chelsea / Ref No. 013	60
Tower Hamlets / Ref No. 014	67
Waltham Forest / Ref No. 015	73

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Questions asked by the Committee

1. To what extent are social housing allocation policies equitable? Are they applied equitably in London?
2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?
3. To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?
4. How could the Mayor and/or government improve the allocation of social housing in London?

Additional questions for London boroughs:

5. What are the main challenges allocating social housing in your borough?
6. How does your borough ensure that your allocation policies are equitable?
7. How does your borough hear from residents to improve the allocation process?
8. Do you have any policies that encourage inter-tenure mobility and address under-occupancy? [If so, how effective are these policies at freeing up more social housing]?
9. How do your allocation policies reflect the Mayor's Housing Strategy?
10. To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme? How could these programmes be improved?
11. How could the GLA and/or government better support local authorities with social housing allocation in London?

1. What are the main challenges allocating social housing in your borough?

There are a number of challenges in allocating social housing in our borough. The main challenges we are facing are:

- **High Demand vs. Limited Supply:** Demand is rising sharply, especially from homeless households. Applications for housing increased by 25.2% in Q4 2024/25 compared to the two years prior. Meanwhile, supply remains low, with only 579 projected lets available in 2025/26, while 3,485 households are in priority need. It is challenging to ensure appropriate supply for a sometimes customer base with wide-ranging and particular needs, including around affordability and mobility/disability suitability, with high numbers of wheelchair accessible properties required. This means waiting times are very long for lower-priority bands, including up to 33 years for a 4+ bed property in Band 4 under our Housing Allocation Scheme.
- **Temporary Accommodation (TA) Pressures:** Over 56% of TA placements are outside Barnet, including outside London, due to local shortages. TA costs are escalating, with a significant (60%) overspend on planned budgets in 2024/25, threatening financial sustainability.
- **Accessibility Needs:** There is a shortage of adapted properties for households with mobility needs. In April 2025, 17 households living in TA required wheelchair-accessible homes, and 256 had other accessibility needs.
- **Regeneration and Decants:** Decants (temporary moves) are in demand for regeneration and major works, which temporarily reduces the available stock. Projects may require the rehousing of tenants due to disrepair or damp and mould to bring them up to standard, thereby reducing supply.
- **Private Rented Sector Decline:** Private landlords are exiting the market, which reduces alternatives to social housing. This increases pressure on council services and budgets and forces reliance on poorer-quality, more expensive accommodation.
- **Damp and Mould Issues:** With the implementation of Awaab's Law, there is increased scrutiny on housing conditions. More referrals to Environmental Health Officers are expected, which may lead to more decants or urgent rehousing needs.
- **Care Leaver Accommodation Shortfall:** Only 31 care leavers were rehoused in 2024/25, far short of our target. Competing demand from other high-priority groups limits availability, and affordability of accommodation is a significant constraint for this cohort.

2. How does your borough ensure that your allocation policies are equitable?

We ensure our housing allocation policies are equitable through a combination of inclusive consultation, strong governance, and continuous monitoring. We complete Equality Impact Assessments of all our customer-facing policies to assess the potential impacts on different groups.

The Housing Allocation Scheme, which was last refreshed in 2023, was developed following extensive engagement with a wide range of stakeholders. This included focus groups with customers with lived experience of homelessness and those affected by the policy, expert consultants, third party partners that work in collaboration with us on homelessness prevention and support services, local councillors, and legal advisors. The renewal process was thorough and transparent, culminating in formal approval by the Cabinet of elected members. The Cabinet Member for Homes and Regeneration in Barnet holds ownership of the policy, ensuring political accountability and strategic oversight.

To maintain fairness and responsiveness, Barnet has embedded mechanisms for ongoing feedback and review. Our Homelessness Forum includes organisations across the borough with links to housing and serves as a key channel for raising operational issues and informing policy and practice refinement. Additionally, the Housing Options Service is subject to regular monitoring and reporting, including regular audits to assess whether both the design and operation of controls to manage risks associated with service delivery provide assurance; this covers aspects including

policy and procedures, equalities, and allocations. This allows the council to assess how effectively the policy is being implemented and whether it continues to meet the needs of diverse residents. These structures help ensure that the allocation of social housing remains transparent, needs-based, and equitable across the borough.

3. How does your borough hear from residents to improve the allocation process?

We actively engage with residents to seek feedback on and improve the housing allocation process through a combination of consultation / engagement, feedback mechanisms, and formal channels for review. The Housing Allocation Scheme was developed following extensive consultation with residents, stakeholders, and housing-linked organisations via the borough's Homelessness Forum. This collaborative approach ensures that the policy reflects the needs and experiences of those it serves and remains responsive to emerging challenges.

In practice, in line with the high levels of demand within the borough we receive a high number of enquiries from local councillors and MPs, often prompted by residents seeking clarity or raising concerns about the allocation process. The council has a strong track record of responding to these enquiries within a five-day target timeframe, demonstrating its commitment to transparency and accountability. Additionally, residents can raise concerns through a robust complaints system that is consistent with the Local Government and Social Care Ombudsman's Complaint Handling Code, and a formal appeals process, both of which provide structured opportunities for feedback and redress.

Through these mechanisms and learning from complaints we have made small but meaningful changes to ways of working. These mechanisms ensure that resident voices are not only heard but actively shape the ongoing development of housing policy and working practices in the borough.

4. Do you have any policies that encourage inter-tenure mobility and address under-occupancy? [If so, how effective are these policies at freeing up more social housing]?

We actively promote housing mobility and equitable access to suitable accommodation through a range of initiatives. We promote mutual exchanges and trade-downs / downsizing / right-sizing through our Mutual Exchange policy and Fresh Start incentives respectively. These schemes not only support individual housing needs but also help optimise the use of available stock across the borough. In addition, we promote national mobility schemes such as Housing Moves and the Seaside and Country Homes programme, broadening opportunities for residents to relocate where appropriate.

We have a dedicated Fresh Start Officer whose role is to promote housing mobility and engage directly with tenants. The borough has recently increased financial incentives for residents who are under-occupying their homes or living in adapted properties where the adaptations are no longer required to move to a property that better meets their needs, thereby freeing up a larger or adapted property that is in high demand but short supply. Dedicated support is also available for tenants wishing to pursue mutual exchanges, ensuring that residents are well-informed and assisted throughout the process.

These approaches have been successful, however the level of demand and unmet need within the borough mean there is always more to do, and we continue to make efforts to increase the take up of these schemes to improve stock efficiency in Barnet.

Mutual Exchanges in:

2022/23: 22

2023/24: 27

2024/25: 11

Trade downs achieved through the Fresh Start Scheme in:

2022/23: 36

2023/24: 61 (year we changed the incentives)

2024/25: 38

5. How do your allocation policies reflect the Mayor's Housing Strategy?

The Housing Allocation Scheme is the council's policy for prioritising and allocating social housing within the borough. The demand for social housing is much greater than the supply of social housing in Barnet. Housing has to be allocated to those with the most urgent housing needs, in line with the Housing Allocation Scheme. The allocation policy supports our Homelessness and Rough Sleeping Strategy and Housing Strategy, which also take into account the Mayor's Housing Strategy and are well aligned with its priorities.

Our Housing Allocation Scheme closely reflects the priorities set out in the Mayor of London's Housing Strategy, aligning with its overarching goal to ensure that all Londoners have access to safe, affordable, and suitable housing. The key aims of the Housing Allocation Scheme are to:

- Meet the legal requirements placed on the council to give appropriate priority to applicants who fall under the Housing Act "reasonable preference groups" to ensure that social rented housing is let to those in greatest need
- Provide a fair and transparent system by which people are prioritised for social housing;
- Promote the development of sustainable mixed communities;
- Recognise residents who make a contribution to their local community; and,
- Make efficient use of our resources and those of the private registered providers with social housing stock in the Barnet area.

A summary of how the borough's Housing Allocation Scheme reflects the various aspects of the Mayor's Strategy is as follows:

1. More Affordable Homes

- Mayor's Strategy: Pushes for increased supply of genuinely affordable housing.
- Barnet Allocations Scheme: Decides how local people access those homes once built (priority bands, waiting list).

2. Supporting Vulnerable Groups

- Mayor: Focus on homelessness prevention, rough sleeping support, and specialist housing (older people, disabled residents).
- Barnet: Gives priority in allocations to homeless households, people with severe medical needs, and vulnerable groups in line with homelessness duties.

3. Tackling Homelessness

- Mayor: Expands funding and services to prevent homelessness and support rough sleepers.
- Barnet: Operates under statutory homelessness duties, allocating social housing and private rented housing to those owed a duty.

4. Quality & Standards

- Mayor: Pushes for safe, well-designed, and sustainable homes.
- Barnet: While not directly controlling design, Barnet's Housing Allocation Scheme ensures residents are moved into housing that meets health and safety standards.

5. Fairness & Transparency

- Mayor: Calls for fair access across London, especially for low-income households.
- Barnet: Uses a clear banding/points system for allocations, aiming to be transparent and consistent.

6. Specialist Housing Needs

- Mayor: Promotes more specialist housing for older people, care leavers, disabled people.
- Barnet: Has specific priority categories for these groups in its Housing Allocation Scheme.

6. To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme? How could these programmes be improved?

We engage with the Housing Moves and Seaside and Country Homes schemes, promoting these initiatives to ensure our customer base is aware of them. Officers actively refer eligible tenants to these schemes and look to support them throughout the process.

However, we believe there are several areas where improvements could enhance the effectiveness and responsiveness of these schemes. One of the key challenges we face is the lack of regular updates following referrals, which makes it difficult to manage applicants' expectations and provide accurate information about progress. This is particularly problematic in cases involving domestic abuse survivors, where sensitivity and timely communication are critical. Officers report that while some clients are reluctant to leave the borough, those who do engage with Housing Moves often receive little to no feedback. Additionally, we find the schemes can be too rigid in their criteria and processes, limiting flexibility for applicants with complex needs or preferences. We believe the schemes would benefit from the introduction of additional flexibility to meet complex needs, and would also benefit if the Mayor contributed to additional awareness raising amongst the community.

7. How could the GLA and/or government better support local authorities with social housing allocation in London?

We would welcome a number of areas of support from the GLA and the Government, including:

- **Support increasing the supply of wheelchair-accessible and adaptable homes** to meet the growing demand from disabled residents. A coordinated protocol between councils and housing associations to help ensure housing associations contribute to the cost of disabled adaptations and that additional funding is available for councils to adapt their housing stock to the needs of disabled applicants (including children with autism) would also be welcomed.
- **Additional Government funding to retrofit existing council stock** to meet accessibility standards.
- **Investment in supported housing**, particularly for disabled people and those experiencing mental health challenges, would also help reduce reliance on temporary accommodation and improve long-term outcomes.
- **Increasing funding and expanding supply.** This could include new grant streams, legislation and grant funding to bring empty homes back into use, and incentives for developers to deliver more social housing. Streamlining planning processes, such as relaxing regulations around office-to-residential conversions, would also help unlock new housing opportunities. Importantly, the focus should be on delivering the right types of homes, including family-sized and adapted properties, to reflect the needs of those on housing needs registers.
- **Additional support for tenancy sustainment** would help vulnerable tenants maintain their homes, reducing repeat homelessness and improving stability. This could involve funding for early intervention services and personalised support at the start of tenancies.
- **The GLA could play a stronger role in promoting prevention work** across boroughs, including better coordination around domestic abuse cases and early housing interventions.
- **Encouraging joint ventures between social housing providers and large private sector entrants to the rental market** such as Lloyds and Blackrock could also unlock new models of affordable housing delivery.
- **Re-invest in the Pan London Domestic Abuse agreement** turning it into a useful tool for boroughs to work together with one another.

While we fully support the promotion of pan-London mobility and collaboration, retaining local control is essential to preserve the benefits this approach delivers. Whilst housing need is high

across London, there are specific local needs and challenges within each borough. We believe the current borough-level approach to housing allocations works well as it enables us to make more responsive, tailored decisions that serve our local communities directly based on our understanding of the local population and needs. By setting our own allocations policies, within the parameters of legal requirements, and managing lettings accordingly we can incentivise approaches and work in ways that align with local priorities. It also enables open and constructive dialogue at the community level, which is key to successful implementation.

1. To what extent are social housing allocation policies equitable? Are they applied equitably in London?

Groundbreaking analysis of 750,000 household records by Heriot-Watt University reveals Black families accepted as statutorily homeless are less than half as likely to gain social housing as their White counterparts (Heriot-Watt University, 2025). When Black families are provided with housing, it is often unsuitable, under poor conditions (i.e. damp, overcrowded) and in deprived neighbourhoods/areas.

Black Equity Organisation exist to **drive generational change and deliver better lived experiences for Black people across the country**. We have [six pillars](#), one being housing and neighbourhood. We have recently been exploring the impact the Windrush Scandal has had on survivors housing options – or lack thereof. We recognise that housing issues affect various communities, our focus is Black African, Black Caribbean and Black mixed heritage communities and our current project has given us the opportunity to look specifically at Windrush victims.

Right to Rent status checks have made accessing social housing difficult for many residents of the UK because of the lack of documentation. Many residents of the UK lack forms of ID including British citizens, and many people are in precarious situations awaiting status decisions that could grant them access to housing and social services.¹ In addition to status, councils require a “local connection” ie. you have lived in the area for some time or have (familial/job) ties to the area you are seeking housing in.² Everyone, including British citizens, must prove their habitual residency. Habitual residency is not legislatively defined but is considered evidence that 1) you have been settled in the UK for continuous time and 2) that you intend to make the UK your home.³ If a person has been away from the UK or just returned within the last two years, extra proof is required. Proving status, local connection, and habitual residency is harder for low-income, migrant, and ethnic minority communities especially who are less likely to have British passports (due to cost of travel) and less likely to have lived in the same area over time (due to cost of living).⁴ Moreover, the switch to E-visas means less people will have paper documentation of their right to live and work in the UK. This problem was notoriously highlighted by the Windrush Scandal where largely Black residents who were lawfully in the UK with legal status (citizenship or ILR) but were unable to prove their status due to the confiscation and destruction of documentation by the Home Office.

Since the Scandal broke, many are still awaiting status decisions thus cannot access social housing or other resources. Those who have received status decisions are still unable to access housing because they cannot meet certain eligibility requirements like habitual residency and local connection. Many Windrush survivors cannot meet

¹ Yeo, C. (2022). *Welcome to Britain: Fixing our broken immigration system*. Biteback Publishing.

² [Getting on the waiting list for a council home - Citizens Advice](#)

³ <https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/annex-1-the-habitual-residence-test>

⁴ Ibid

residency requirements because they have been locked out of the UK, jobless, homeless, or transient for years. Only a few groups have exceptions to the habitual residency requirement like EEA members who qualify (under [section 7\(1\) of the Immigration Act 1988](#)) and refugees from Ukraine (as noted in [Regulation 3 of the Eligibility Regulations](#)).⁵ However, there are other groups unable to meet these requirements of no fault of their own who have no written exemptions like the Windrush community.

Other eligibility criteria for social housing include not having a home domestically or abroad and not having too much money in savings. These criteria keep some Windrush survivors from accessing social housing because some have homes abroad from when they were locked out of the UK or because their savings are too high after receiving compensation for the Scandal. This money is often to cover debts and living expenses to restart their lives.² However, the amounts awarded are insufficient for long-term buying/renting a home at regular price, the median monthly rent for a one-bedroom home in London was £1,280 (2022-23)⁶.

2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

Councils require applicants to prove a ‘local connection’ to the area of which they are applying to live in – this would disadvantage migrant communities and refugees who may have recently moved to the area.

“Black Disabled people in the UK face unique barriers at the intersection of racism and ableism—yet their stories are chronically absent from disability advocacy, academic research, and policy-making. This exclusion perpetuates **harmful gaps** in healthcare, employment, and social support⁷”. Health and medical conditions contribute to council’s allocation policy, however the underdiagnosis and misdiagnosis of Black patients and disproportionate figures of for example mental health (higher rates of mental illness)⁸ mean that for Black people seeking housing, health issues may not always be reflected or taken into consideration. In regards to the Windrush survivors, many have suffered physical and mental harm due to impact of the scandal, some were also denied NHS healthcare because of a lack of documentation which was ultimately because of government failures. Although the scandal has affected subsequent generations, many of the Windrush survivors are of an older demographic and may have additional needs, this has to be recognised in the context of housing and possible adaptations that may need to be made.

⁵ <https://www.gov.uk/guidance/allocation-of-accommodation-guidance-for-local-authorities/chapter-3-eligibility-and-qualification>

⁶ <https://trustforlondon.org.uk/data/rent-affordability/>

⁷ <https://www.disabilityrightsuk.org/news/spotlighting-intersectional-changemaking-researcher-explores-black-disabled-experiences-uk?srsltid=AfmBOopK1u2qT6OyHZY-UXZWnSasZUXEzpo6Va9ma3BpPmazp63RqJc2>

⁸ <https://www.mentalhealth.org.uk/explore-mental-health/a-z-topics/black-asian-and-minority-ethnic-bame-communities>

Homelessness is disproportionately high amongst the Black population – Single Homeless Project reports *“Black people are four times more likely to face homelessness than white people, Black households make up just 4% of the population, but account for 10.2% of those applying for homelessness support.* Due to stigma, racism and ‘invisible homelessness’ – the data is not reflective of reality which again is problematic as homelessness is one of the considerations when councils allocate housing.

Some councils award priority points to people who are working⁹ – people from ethnic minority backgrounds face higher unemployment rates which for some of the demographic is due to structural discrimination and overrepresentation in precarious work.

Although some councils give priority to those who are fleeing domestic violence, Black women may not feel this applies to them. Sistah Space who have been campaigning for Valerie’s Law to be fully implemented report that 85% of Black women do not feel supported by non-Black domestic violence advisors and that risk assessments are not culturally sensitive. The “strong Black women trope” which we discuss extensively in [Public Harms report](#) reveals that oftentimes, Black women are seen as resilient, unshaken by hardship and not believed about the harm being perpetrated against them – this extends not just to departments under the Criminal Justice System but also housing, and health institutions as well.

3. To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?

4. How could the Mayor and/or government improve the allocation of social housing in London?

- There has been a drastic decrease in building new social housing from over 200,000 built in the mid-1950s to year to under 10,000 by 2023/24 in England¹⁰. To put it simply, more social housing needs to be built.
- Culturally competent guidance for colleagues within housing departments is needed including, guidance to identify Windrush survivors (a disadvantaged group which are being neglected and harmed)
- Even without building there is opportunity to expand the housing stock. As of October 2024, it is reported that there are nearly 720,000 empty homes¹¹. There

⁹

https://england.shelter.org.uk/housing_advice/council_housing_association/how_to_apply_for_council_housing/priority_housing_register

¹⁰ https://england.shelter.org.uk/support_us/campaigns/social_housing/loss_of_social_housing

¹¹ <https://www.bbc.co.uk/news/articles/c3r413l5n57o>

should be a concerted effort to renovate these homes to meet safety and health standards and convert them to social housing and/or working with private landlords offering improved incentives to provide affordable rent and long-term tenancies.

Allocation changes are critical but can only do so much for addressing the housing crisis overall, particularly at a time when the cost of living continues to increase and more people will be in need.

Social Housing Allocations in London: equity, effectiveness, and policy reform

Executive Summary

London's social housing allocation system is under unprecedented strain. With over 323,000 households on waiting lists, acute shortages of affordable homes, and significant disparities in outcomes across boroughs - the current system faces challenges of equity, efficiency, and a lack of public and institutional trust. This response to the London Assembly Housing and Regeneration Committee's inquiry into social housing allocations will examine the equity of allocation policies, the impact on disadvantaged groups, the effectiveness of current approaches in maximising housing stock, and offers evidence-based recommendations for reform. Our analysis draws on our research and polling at Centre for London, engagement and alignment with social housing providers, including the G15, and analysis of borough-level data to provide a convened evidence base.

1. To what extent are social housing allocation policies equitable? Are they applied equitably in London?

1.1. The policy landscape

Social housing allocation in London is governed by a combination of national legislation (notably the Housing Act 1996), statutory guidance, and local authority discretion. All local authorities must operate an allocation scheme that gives 'reasonable preference' to certain groups (e.g., those who are homeless, living in unsanitary conditions, or with medical needs), but beyond these requirements, councils have significant discretion to set local priorities and processes – as evidenced by London's disjointed landscape for allocation policy. According to polling from Centre for London's polling partnership with Savanta in April 2025, Londoners are facing escalating housing costs, with 75% stating that costs have increased in the last 12 months. This has therefore increased the pressure on registered providers to deliver equitable solutions to social housing.

1.2. Evidence of inequity

Inconsistency across boroughs:

Allocation policies are not applied equitably across London. Outcomes for applicants vary significantly depending on borough and are shaped by local needs, political priorities, and resource constraints. For example, while some boroughs process nominations swiftly and transparently, others experience long delays and opaque decision-making, and as reported by industry professionals, eroding trust in the system.

Fragmentation and local discretion:

Around 75% of re-lets and all new-build nominations are controlled by local authorities, limiting the influence of housing associations over allocations. This structure - while respecting local democratic control and recognising the clear importance of local authority management of subsidised housing - results in differing approaches and outcomes between

boroughs, sometimes leading to inefficiencies, longer void periods, and ultimately, a discharge of due diligence in supporting vulnerable residents. This is, ultimately, caused by a lack of effective coordination and partnership between boroughs and housing associations. The 2019 report from the Chartered Institute of Housing on rethinking the allocations process found disparities in service standards where local authorities and housing associations differ on allocations – especially in differing strategic approaches to nomination agreements. As found in the Centre’s 2024 report, further work is needed to ensure boroughs and housing associations work closely, both for formal and regulatory purposes, and to deliver effective referrals and pre-tenancy processes.

Data gaps and transparency:

A lack of standardised, city-wide data on waiting times and allocations undermines the ability to assess and address inequities. Centre for London’s 2024 research in partnership with the G15, and consultation response to The London Plan found a patchwork of different approaches to data collection, making comparative analysis and policy targeting challenging – while limiting the ability for a joined-up housing strategy combining supply, demand, and social need. In some cases, for the Centre’s 2024 report, boroughs were unable to supply information due to a lack of central processing resource, lack of a coordinated response through Freedom of Information requests, or allocation policies which do not translate to accurate, easy-to-access monitoring.

1.3. Quantitative disparities

- **Waiting times:** Average waiting times for a one-bedroom property range from 184 days in Sutton to over six years (2,200 days) in Lewisham. For family-sized homes (4+ bedrooms), waits can exceed 30 years (11,000 days) in Hackney, compared to under a year (345 days) in Bromley. These average times are volatile and subject to change due to emergency or urgent needs.
- **Regional variation:** Inner London boroughs generally have longer waiting times than Outer London, reflecting sharper housing need and higher population densities.

1.4. Perceptions and realities

Industry bodies claim that there is perception among some groups that the system is unfair, particularly when councillor or MP enquiries result in residents being prioritised ahead of others with equivalent need. Perceptions of unfairness have been exacerbated by social housing access and allocations becoming a feature in wider political debates on migration and the welfare system. This has undermined confidence in social housing as a tenure for long-term housing equity, while placing housing providers under significant pressure to resource transformative changes to service.

1.5. Recommendations

Centre for London is in alignment with the G15 to develop a more consistent, transparent approach to allocations, including:

- A shared framework between boroughs and housing associations to improve consistency and set clearer expectations on nomination turnaround times.
- Enhanced data-sharing and transparency on decision-making; and clear escalation points for interventions.
- Adequate resourcing for allocations teams.

2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

2.1. Systemic disadvantages

Digital exclusion:

Increasing reliance on online systems marginalises residents without reliable internet access or digital literacy. In East London, around 30% of premises lack access to resilient fibre broadband, which limits the ability of housing providers in areas of intense housing need to provide full-throated systems for supporting existing and new social housing developments.

Older and disabled residents:

Older and disabled residents face barriers in finding suitably adapted homes or ground-floor units and often lack support to manage moves. While some housing associations offer practical help, resources are limited, and processes remain challenging. The disjointed landscape for allocations policies in local authorities also lacks consistency in its supply of accessible residences, with some boroughs including separate tenure categories for wheelchair-accessible homes and others subsuming accessibility standards across multiple bandings. This is a confusing, inefficient standard of service which, according to industry professionals, has reduced resident confidence in registered providers.

Concentration of high-need residents:

Similarly, as reported by registered providers, allocations are increasingly concentrating residents with higher support needs (e.g., mental health, substance misuse) into general-needs blocks, where their needs may not be fully met. This can undermine community cohesion and place strain on management services. Residents with disabilities or accessibility needs are also underserved by fair access to amenities in blocks or sites designed for broader groups. This distinction is further mismanaged by a strategic separation of housing tenures for specialist homes, such as supported or care-assisted housing, which in the case of many boroughs are subsumed into general-needs bandings. This makes data analysis and the ability to manage social housing stock more difficult.

2.2. Ethnic and national disparities

According to G15 analysis, national CORE data for 2023/24 shows that 87% of lead tenants in new social housing lettings were UK nationals and 76% were White British. Reference data for ethnic identity in social housing refers to the 'Household Reference Person' (HRP) and does not account for wider household members or the ethnic makeup of the composition of the household, including a HRP's partner. In London, more than two thirds

(68%) of HRP's born overseas hold a British passport, meaning they are not necessarily foreign nationals.

While these figures provide context, there are perceptions among some White British residents that allocations may unfairly favour others, risking erosion of trust in the system. Transparency about allocation outcomes is essential to counter misinformation and support social cohesion, as well as overall improving the quality of management. In London, data from the Census 2021 has been repeatedly misused for political reasons, overstating the number of social housing residents born outside the UK – around 47% of the capital's social housing residents as measured in 2021.

2.3. Policy and practice

Local authorities' discretion in setting eligibility and priority criteria can result in certain groups being systematically disadvantaged. For example, some councils operate residency requirements or prioritise 'community contribution,' which can disadvantage recent migrants or those not in formal employment. Introduction of new national policies to prioritise groups in social housing lettings, such as veterans, key workers and refugees, has been integrated into an already complex system of metrics for assessing need.

2.4. Recommendations

Centre for London supports calls made by the G15 to improve policy and practice for the provision of social homes to vulnerable groups, while also ensuring that providers are resourced adequately to tailor support to where urgent need is identified.

Recommendations in this area include:

- Address digital exclusion by providing alternative application routes and digital support.
- Improve accessibility and support for older and disabled residents.
- Increase transparency and communication about allocation outcomes to build trust, counter disinformation and raise awareness of positive letting outcomes.
- Ensure that allocations policies are regularly reviewed for compliance with the Equality Act and other anti-discrimination legislation.

3. To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?

3.1. Under-occupation and downsizing

Under-occupation as inefficiency:

Under-occupation remains an inefficiency in the system, but in London this is a consequence of a lack of supply and practical assistance to facilitate downsizing or moving. Compared to owner occupation, London's social housing sector is significantly more efficient in occupancy, with 8% of social homes in the capital underoccupied compared to 48% for owner occupied homes. While most housing associations have policies and incentives to encourage downsizing, current financial incentives (typically a

few hundred pounds per spare bedroom) are insufficient to motivate moves and, due to resource, boroughs and housing associations will lack practical aid to facilitate moving. The disjointed landscape for allocations in London boroughs also limits the efficiency and cost-effectiveness of downsizing or transfers between different borough areas, particularly where allocations policies are not transparent. Furthermore, Centre for London's 'What London Thinks' polling partnership with Savanta found in April 2025 that 55% of Londoners had not considered downsizing as a consequence of increased housing costs across all tenures, compared with 41% of Londoners who had considered it. This further illustrates the broader cultural challenge for incentivising downsizing as housing option. Perceptions of under-occupation have also been affected by wider political narratives linked to immigration and the welfare system.

Successful schemes:

Some boroughs, such as Camden, have piloted more generous schemes (e.g., £5,000 plus £1,500 per bedroom released), resulting in a 16% increase in downsizing applications and a 75% increase in moves. However, such initiatives are rare and not standardised across London. This is not improved by continued inertia in the wider housing market.

3.2. Policy gaps

- **Limited inter-tenure mobility:** As reported by social housing providers, there is limited direct inter-tenure mobility. While some signpost tenants to shared ownership, few actively manage moves between social and intermediate tenures. There is little financial incentive for residents to leave lower-cost social housing for intermediate or market rent properties, while pathways to affordable rent are limited by a lack of overall supply.
- **Barriers to downsizing:** Financial incentives alone are insufficient. Successful schemes combine money with wraparound housing support (e.g., help with packing, removals, managing bills). Offering new-build homes as part of a downsizing incentive has also proven effective, but this is limited in boroughs with a lack of new social housing being delivered.
- **Cost of delivery:** The lack of new supply in the market, and reduced viability conditions for taking on Section 106 homes, has led to unprecedented shortages of housing stock. The impetus to deliver intermediate rent homes at a reduced loss rate over fully social rent has limited the ability of providers to provide a guaranteed, low-cost social home.

3.3. Data on stock utilisation

Nearly 50% of households in London are classified as under-occupying their home, including 73% of owner-occupiers aged 65 or over. This is partly due to tax and benefit structures (e.g., council tax, stamp duty) that incentivise staying put, and the lack of appropriate downsizing options. While this is relevant to the wider housing market, it is less relevant for social housing providers due to London's social housing sector being more efficient in occupancy (8% of total stock). Further policies are needed at city and national

government levels to transform the housing market in London to become more fluid and increase the rate of sales and development for social and affordable homes.

3.4. Policy considerations

Centre for London supports housing policies which maximise the efficiency of our housing stock, including for the social sector. We support the G15's calls to improve the landscape for a more fluid social housing stock but highlight that stock gains are limited due to low rates of under-occupation. Ensuring there is a healthy pipeline of social homes, with a variety of tenures and designs, is an essential strategy to pursue to solve high rates of overcrowding. The Centre is researching into under-occupancy and inefficiency in housing consumption as part of a new project and recognises there is a clear need for policy which incentivises a fluid market – social housing in London is, by design and definition, structurally fluid as a consequence of allocations policies. Therefore, we argue that the focus should be on the wider owner-occupied tenures and private rented sector to tackle inefficiency.

4. How could the Mayor and/or government improve the allocation of social housing in London?

4.1. Consistency and transparency

Pan-London mobility and data-sharing:

Centre for London supports a social housing system which delivers improvement to services, supports vulnerable residents, and boosts housing equity. The Mayor and London boroughs should collaborate to expand pan-London mobility in the system through mutual exchange and Housing Moves, improving digital infrastructure and data-sharing between boroughs and landlords, and standardising IT systems to manage nominations efficiently. The current relationship between Greater London Authority, boroughs and social housing providers is not formalised and requires much greater integration to support improved provision of social housing.

Standardised frameworks:

As recommended in our 2024 report, London boroughs should collaborate with the Mayor to develop a standardised framework for the collection and analysis of borough-level data on social housing waiting lists, waiting times by bedroom size and banding, deployed through regulations directed by the Regulator for Social Housing or Housing Ombudsman. This data would benefit the Mayor and GLA in providing a much clearer picture of the state of the capital's social housing stock and areas of greatest need for housing support by both city and national government.

Strategic Planning and Supply:

- Increase the supply of social housing to 33,000 new homes for social rent annually for 15 years, with a significant share in London. This figure has been agreed as a central goal for delivery between multiple housing providers and organisations.

- Unlock development on strategic parcels of Green Belt land for social housing-led residential areas. This includes the development of the proposed New Towns in Crews Hill/Chase Park and Thamesmead.
- End the Right to Buy scheme to minimise the loss of vital social stock.

4.2. Incentives and support

- Provide clear incentives for boroughs and housing associations to participate in mobility and downsizing schemes. This includes financial incentives such as exploring tax and rent relief schemes.
- Offer practical relocation support (e.g., guidance on demographics, costs, adapting to change) to build confidence in moves. This should be guided strategically between boroughs to ensure efficient moves across boundaries and allocation policies.

4.3. Flexibility and local control

- Retain local control as a vital principle but align local discretion with a more consistent pan-London approach.
- Use planning mechanisms (e.g., Section 106, Community Infrastructure Levy) to support a better mix of homes and encourage right-sizing.

4.4. Funding and investment

- Increase the Affordable Homes Programme to £15.1 billion a year to fund the building of 90,000 social homes annually in England, with at least 30,000 in London.
- Create a £4.45 billion Net Zero Fund for retrofits and renovations of social housing, with £766 million allocated to London. Housing providers are under unprecedented pressure to deliver significant retrofit upgrades to existing stock; further subsidy schemes or grants such as Warmer Homes London should be rolled out to ensure housing providers can deliver safe, secure homes from new and existing stock.

4.5. Governance and accountability

- Establish an Affordable Housing Commission to set levels of grant for affordable housing, based on expert projections.
- Devolve control over property taxes and powers to capture land value to the Mayor of London.

Conclusion

London's social housing allocation system is at a crossroads – it is embedded into a housing market where delivery rates are low and affordability is lower. While the principles of fairness and local accountability remain central, the evidence points to significant inequities, inefficiencies, and barriers for disadvantaged groups. The current landscape of borough-led allocations policies ensures greater control over stock but lacks the nuanced need for wraparound, London-wide standards. The system's fragmentation, lack of

standardised data, and insufficient supply of affordable homes undermine its effectiveness and public trust.

To address these challenges, a more consistent, transparent, and data-driven approach is needed – one that aligns local discretion with pan-London standards, expands supply, and provides targeted support for those most in need. The recommendations outlined above offer a blueprint for reform that can deliver a fairer, more effective social housing system for all Londoners.

References

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- Chartered Institute for Housing, [Rethinking Allocations](#), 2019.

Social Housing Allocation in London: A Call for Justice, Accountability, and Community-Led Solutions

Coffee Afrik CIC is a community-led organisation advocating for equitable housing and social justice for Black, Brown, and migrant communities across London. Through our campaigns, including ongoing work highlighting housing corruption and systemic failures, we have exposed the deeply rooted issues affecting social housing allocation.

Recent important reports and investigations include:

- **The Guardian – “They treat us like animals”**
This article reveals the brutal reality of families waiting years for safe housing and taking legal action against councils for neglect and unsafe conditions.
- **OpenDemocracy – Social Housing Racism in Tower Hamlets**
Investigations uncover systemic discrimination, particularly unlawful removals of Somali families from waiting lists and institutional bias in housing allocations.
- **The Voice – Somali Women Protest Over Housing Discrimination**
Coverage of Somali women’s protests in Hackney highlights persistent discrimination and poor leadership within local housing authorities.
- **Shelter Report – *My Colour Speaks Before Me***
This comprehensive study documents how race, ethnicity, and accent affect social housing access and treatment, emphasizing the hostile experience of racialized applicants.

London’s social housing allocation system is broken, especially in boroughs like Tower Hamlets, Hackney, and Newham. The critical issues include:

- Chronic overcrowding and failure to deliver promised homes. Newham has over 25% of households overcrowded, Tower Hamlets committed to building 4,000 social homes over four years but has yet to deliver any.
- Governance and safety failures with Tower Hamlets downgraded by the Regulator of Social Housing; Newham censured over fire and electrical safety breaches; Hackney hit with high rates of upheld Housing Ombudsman complaints.
- Racial discrimination disproportionately affecting Black, Brown, Somali, and migrant communities, who are routinely excluded or unfairly treated in allocations.
- Thousands of empty council homes across boroughs, poor management of stock, and ineffective downsizing policies that fail to respect community ties or free up homes.
- Deeply embedded racism within allocation procedures, with reports showing Black households experience longer waits and discriminatory treatment.

These issues cause severe physical, mental, and social harm to residents. Mold, overcrowding, and disrepair exacerbate health problems and trauma, disproportionately impacting marginalized communities.

Recommendations to address these failings include:

1. Fund and support community-led housing cooperatives that center Black, Brown, and migrant leadership, providing accountability and self-determination.
2. Implement mandatory anti-racism standards with measurable accountability within social housing governance.
3. Conduct independent audits of borough housing practices, with transparent data published by race, ethnicity, disability, and household type.
4. Enforce sanctions and consequences for councils failing to meet obligations or endangering residents.
5. Invest in grassroots navigators, peer researchers, and community-led monitoring aligned with models like Shelter's *My Colour Speaks Before Me*.

Housing is fundamentally a racial justice issue requiring structural change. The evidence from these investigations shows that without radical transformation, social housing allocation will continue to perpetuate systemic racism and harm.

We urge the Mayor, government, and housing authorities to listen to affected communities, back community-led solutions, and prioritize accountability and transparency. Coffee Afrik CIC remains committed to partnering in this urgent work to dismantle barriers and build a fairer, more just housing system in London.

Councillor Leo Pollak (Labour Member for South Bermondsey Ward, Southwark Council) submission

I'm writing to respond to your consultation on housing allocations in the city which I greatly welcome. You may recall I presented findings to your committee 3 years ago from a major research exercise I carried out with the Smith Institute examining the phenomenon of declining churn, and approaches to best use of existing housing stock and maximising the rehousing impact of new social homes. This has been [widely reviewed](#) and applied in sector discussions on best practice as well as numerous LA housing allocation reviews - eg [PowerPoint Presentation](#) or [Future of Westminster Commission - Housing Review 2023.pdf](#).

I will focus my response to the consultation on question 7, even though my work touches on a number of others in the consultation.

7. What further role could the Mayor play in improving housing allocation policies in London?

While I'm glad to see references to this work in the [London Assembly Report](#), the [full report](#) details not only how allowing occupied homes to be made available as 'pre-lets' can create additional efficiency in social housing system (as in private sector moves), but also draws out how the rehousing impact of new social housing is not being given any consideration in seeking to maximise the public benefit for households suffering different forms of housing needs. The hierarchy of need established in the allocation policies of individual local authorities presents individual lets as a zero sum trade off between different households' needs, whereas deliberate chain construction can both tackle severe overcrowding (and in turn future homeless presentations) as well as terminate chains (varied by bed size) with homeless households to provide much needed security as well as relieve the financial burden on local authorities.

Given the immense pressure on the GLA and combined housing waiting lists and reduced affordable housing requirements in planning policy, it is imperative that the GLA use its grant giving power under its new SAHP settlement to maximise the rehousing impact of every new social home that comes into circulation.

The primary way to do this is to vary the grant provision not by bed size or cost (which is open to too many variables to apply consistently), but by **varying grant by the numbers of households rehoused administered through a simple chain tracking form returned to the grant manager a set number of months after the first full completion and let**. This will incentivise swifter lettings on the part of councils, a better engineered supply of chain aware housing sizes and types (including both family sized and attractive options for older residents), as well as encourage the use of chain construction (including uptake of chain making software platforms) that spreads the benefit to a larger number of households in critical housing need.

The detail of this approach is set out here in the attached briefing to Southwark council, but also features key data from across all 32 London boroughs on declining churn, and the options for maximising rehousing impact from existing and new supply.

Submission to the London Assembly's Call for Evidence on Social Housing Allocations

Crisis is the national charity for people facing homelessness. We know that homelessness is not inevitable, and we know that we can end it together. Crisis is dedicated to ending homelessness by delivering life-changing services and campaigning for change. Every year we work directly with thousands of people experiencing homelessness, to help them rebuild their lives and leave homelessness behind for good.

Crisis welcomes the London Assembly's timely investigation into allocations in social housing. Our recent research report, *Moving the Deckchairs?: social housing allocations in England*, co-authored with Heriot-Watt University and the UK Collaborative Centre for Housing Evidence explores approaches to allocations in England and how they impact on homelessness. The research was conducted using a survey of 68 general needs housing associations in England and analysis of case study evidence involving local authority and housing association representatives in four areas in England. The research shows that:

- Strongly harmonised local allocations systems, implemented through a common allocations policy and/or common housing register across local authorities and social landlords, have helped to minimise how often nominations for people to live in social homes are refused and how long homes are unoccupied.
- Nearly one third (31%) of responding housing associations said that pre-tenancy affordability checks often bring to light new information which leads to an offer of housing being deemed unsuitable for an applicant, rising to 39% amongst larger associations. Nearly a quarter said that households below a certain income threshold are sometimes excluded from the housing register from which they receive applications for social housing lettings, with these exclusions often applied in the context of local authority housing list restrictions.
- There is evidence that general needs housing associations in England are struggling to secure the additional support required by some applicants – almost two-thirds (63%) of respondents operating choice-based lettings systems reported that availability of support for vulnerable applicants was challenging.

This evidence highlights that, while local government and housing association harmonisation can mitigate against preclusions from housing registers and the broader social housing system, a number of factors contribute to social housing exclusion. Our research demonstrates that a majority of these factors relate to financial security and resilience, with those applicants who are deemed as unlikely to afford social housing often blocked from accessing it. However, it is evident that these socio-economic factors intersect with other variables such as race, ethnicity, gender and disability – creating environments wherein particular demographic groups are more likely to be excluded from social housing than others.

As we will set out in this response, there is evidence of inequalities and disparities in social housing allocations in London, particularly amongst people experiencing homelessness, BAME households, people with lived experience of domestic abuse and those with a disability. We are, therefore, calling for the Westminster Government to carry out a national review of how social housing is allocated in England to ensure that these cohorts have access to secure and genuinely affordable homes. We also ask the Mayor of London to consider our research findings and have recommended a number of steps in the conclusion of this submission which they could take support an increase of social housing allocations to homeless households as part of the Mayor's Housing Strategy.

It is also evident, however, that more data on how allocations systems impact on people, disaggregated by demographic categories and the various stages of the allocations system (e.g. waiting lists, housing registers, bidding), is needed, and we hope that this investigation will contribute towards encouraging the Mayor and/or Government to publish such a comprehensive data set. We also argue that data sets should aim to be joined up where possible, so that it is possible to understand how many people who have received a homelessness duty from their local authority are offered and move on to social housing.

The importance of having a good understanding of how allocations are working at all levels of the housing system and using that understanding to run effective, equitable allocations systems is underlined by the scarcity of social housing, which is particularly acute in London. While we recognise the unique challenges London faces with regards to housing delivery, we are concerned about a potential worsening of this shortage as a result of the recently announced lowering of affordable housing requirements. We need the GLA, working with local authorities and housing associations, to use all of the funding and levers at its disposal to build the social rent homes that are so desperately needed at pace and scale. We also believe that well-run and fair allocations systems for social housing should go hand-in-hand with this much-needed focus on genuinely affordable development.

Barriers to social housing

Social housing allocation policies are intended to prioritise those in greatest need, including people experiencing homelessness. In practice, however, evidence shows that this does not always happen. English housing associations have wide discretion in setting qualification criteria for access to their housing registers. This has resulted in the implementation of barriers to accessing social housing that may exclude people with experiences of multiple disadvantage who have been subject to civil and/or criminal proceedings e.g. as a result of anti-social behaviour (ASB), have been unable to pay their rent or who fall into homelessness. This is exemplified in Crisis's *Moving the Deckchairs?* research which highlights a range of barriers to social housing allocations:

- 71% of English housing associations taking part in the research always or sometimes excluded applicants with rent arrears from registers
- 37% excluded homeless households without a local connection from registers
- A quarter said that the housing registers through which their properties were let sometimes excluded applicants below a certain income threshold
- 76% sometimes or always exclude applicants with a history of ASB if they had no support package in place from housing registers. Authorities can misinterpret domestic abuse or mental health crises as ASB, leaving vulnerable tenants at risk of eviction and future exclusion from housing registers

Even if applicants have managed to access relevant housing registers and have attained sufficient priority to be made an offer of housing, they can still be excluded from social housing because of 'pre-tenancy checks' (PTCs).

PTCs are widely used by housing associations in England, with larger housing associations much more likely than smaller ones to report that they 'often' determined an applicant was unsuitable for a tenancy offer because of these checks.

The most frequent reasons cited for deeming an applicant unsuitable for an offer related to affordability and/or financial capability concerns, reported by four in ten (39%) large English housing associations. 30% reported that an inability to pay rent in advance or at tenancy commencement often led to an offer being deemed unsuitable. By contrast, only 4% of

Scottish housing association reported that affordability issues, and 9% that financial capability concerns or inability to pay rent in advance 'often' led to an offer being deemed unsuitable.

This evidence demonstrates that, in England, social housing allocations are often inequitable, leaving many people for whom social tenancies should be the only option without a secure and genuinely affordable home. The evidence presented in the research shows that this inequity is regularly centred on socio-economic factors, such as income – with some of the biggest barriers to allocations related to affordability and financial capability, suggesting that those who need homes the most are often seen as the most likely to fail to sustain a tenancy. When explored through an intersectional lens, however, the data may also suggest that other demographic factors could impact on how inequities in allocations policy are felt.

Disparities related to race and ethnicity

Evidence shows that certain demographic groups—particularly Black and Asian-led households—are underrepresented in social housing despite being disproportionately affected by homelessness. Shelter's report *My Colour Speaks for Me* highlights that Black and Asian-led households face systemic barriers in accessing social housing, despite high levels of housing need.¹ Furthermore, Statutory homelessness data (2023–24) shows that Black families are significantly less likely to be allocated to social housing through the statutory homelessness system (10%) compared to White families (24%).²

Research shows that this disparity in access to social housing can be attributed to links between historic rent arrears and factors such as English not being someone's first language and households comprising of non-white tenants, with evidence demonstrating that these groups often experience more significant financial precarity caused by limited financial resources and resilience.³ This evidence suggests that these households are more likely to experience financial shocks that lead to rent arrears and may, therefore, be excluded from housing registers when applying for housing in the future.

Another key area to examine in how disparities related to race and ethnicity affect people's experiences of social housing is quality and suitability of housing. While we don't have data on how this works through social housing allocation policies, data shows that there are disparities between different groups in terms of non-decency and overcrowding. 24% of Mixed White and Black African households live in non-decent homes vs. 15% of White British households. Overcrowding is highest among Arab (25%), Bangladeshi (18%), and Black African (16%) household, while 2% of White British households were overcrowded.⁴ A survey by Shelter in 2023 also showed that 71% of BME social tenants have experienced poor conditions in their homes compared to 63% of white tenants.⁵ These disparities suggest that allocation policies, while appearing neutral, are not being implemented in ways that ensure equitable outcomes

Gender

¹ [My colour speaks for me: How racism and discrimination affect Black and Black Mixed heritage people's access to social homes](#), pp.13-15.

² [Black and minoritised people feel forced to disguise their identities | Heriot-Watt University](#)

³ [tenancy-sustainment-social-housing-final.pdf](#)

⁴ [My colour speaks for me](#): p.14.

⁵ [My colour speaks for me](#): p.74.

While evidence shows that allocations systems present particular barriers for people from ethnic minority households – particularly those with limited financial resources, it is also clear that the legislation that governs allocations can limit access to genuinely affordable homes for other cohorts. The intentionality rules – criterion used to establish entitlement to homelessness and housing support, for example, may disadvantage women who abandon properties as the result of domestic violence. While intentionality should not apply to those for whom it is unreasonable to live in their accommodation, e.g. as a result of domestic abuse, qualitative evidence highlights that many survivors have been blocked from accessing social housing because they are viewed to have chosen to leave their home.⁶

In addition, research emphasises that experiences of domestic abuse amongst social housing tenants may act as a barrier to tenancy sustainment. For instance, evidence shows that women experiencing domestic abuse, while living in social housing, have been labelled as anti-social and, in effect, blamed for the noise and disruption caused by their perpetrator. This has resulted in sanctions from housing officers and, in some cases, exclusion from social housing. Despite evidence of this happening operationally in the housing system, we do acknowledge the efforts that much of the sector has taken to improve domestic abuse awareness training and to better support victims.⁷

Disability

Through our London Housing First service, we have seen that support for disabled people to access housing is variable from borough to borough. We have found that the people we support with conditions related to mental health, neurodiversity and substance misuse are often treated differently and receive a different priority than people with physical health conditions and disabilities – a problem that can be compounded when housing associations and local authorities do not adequately understand, or in some cases actively stigmatise, these conditions. This former group are often not initially found eligible to join social housing registers, which may be because they have “invisible” needs and/or physical disabilities are given more recognition, which requires our teams to subsequently advocate for their needs to be recognised.

The lack of accessible homes is also major barrier to effective allocations. Despite the M4(2) accessible housing standard, implementation has been weak. Wheelchair users face decades-long waits for suitable housing. Disabled people are often excluded not by allocation policy directly, but by the failure to provide appropriate stock.

Housing Moves and Seaside and Country Homes Schemes

We support the Housing Moves and Seaside and Country Homes schemes and are in favour of pan-London initiatives which enable people to move between social tenancies and create more opportunities for mobility. However, we understand that the lack of new social housing lets across London’s boroughs has been a significant barrier to the Housing Moves scheme which has consequently closed. We would support efforts by the GLA to review and revitalise pan-London and outside of London mobility schemes.

Variation by borough

Our London service has also emphasised that they and the people we support experience eligibility, allocation and lets as a mixed picture varying from borough to borough. Variation can take the form of different banding systems, differing policies and a range of practices,

⁶ [priority_report_2022 - final_interactive.pdf](#)

⁷ [‘I feel so trapped’: women’s experiences of antisocial behaviour intervention in social housing](#)

resulting in people in different boroughs with similar needs receiving different priority. Their experience is consequently that some boroughs feel more equitable than others, ranging from good to poor.

Recommendations

The Mayor of London has an important strategic and convening role to play in partnership with the statutorily responsible boroughs and housing associations. We suggest that the Mayor could improve allocations of social housing in the following ways:

- Hold meetings or roundtables with boroughs and housing associations to address the findings of the Assembly's inquiry and other research, especially focused on the evidence of ethnic and racial disparities in the way social housing allocations operate and what plan of action could be made on these issues.
- Make the case to boroughs for taking innovative approaches to allocations that prioritise people with experience of homelessness, for example direct offers of at least 50% of social housing lets to homeless households and households in temporary accommodation. This could be time-limited or permanent and would address the barriers that we have highlighted in this submission, while also reducing temporary accommodation costs and relieving homelessness pressures. A similar initiative has been agreed in Liverpool City Region and RB Greenwich has offered new build council homes to households in temporary accommodation.⁸⁹
- Consider establishing a pan-London framework with boroughs for social housing allocations, setting a standard and increasing consistency between local authorities. Local authorities would still be able to retain local flexibility according to their context.
- Review housing transfer schemes and consider whether it is possible to relaunch a pan-London mobility scheme with cooperation between boroughs on allocations and transfers.
- Advocate to national government about improved data on social housing allocations (please see final recommendation under government recommendations).

The Mayor of London could also support advocacy of national change needed that would support change in this space, for example raising the issue of how the welfare system means a significant minority of households entitled to mainstream social security benefits is unable to afford a social home.

The Westminster Government could improve the allocation of social housing in London in the following ways:

- Review the Code of Guidance on social housing allocations to encourage social landlords to improve access to social housing for people experiencing homeless and applicants with additional support needs by providing either supported bidding or direct lettings for this group. Multi-sectoral panels can play a role in overseeing direct lettings, ensuring careful matching to individuals' housing and support needs.
- Introduce a new duty, akin to Section 5 of the Housing (Scotland) Act 2001, which makes clear that a housing association must rehouse a statutory homeless household

⁸ [Direct Lettings - Property Pool Plus](#)

⁹ [The Fast and The Curious: Taking a hypothesis-led approach to tackling the temporary accommodation and homelessness crisis in Greenwich | by Royal Greenwich Digital | Royal Greenwich Digital Blog | Medium](#)

referred to them within a 'reasonable period' unless they have a 'good reason' not to do so.

- Review the interaction between social housing rent levels and social security arrangements to ensure that no household entitled to mainstream social security benefits is unable to afford a social home that is of an appropriate size to their needs
- Direct the Regulator of Social Housing to establish requirements in the Tenancy Standard to prevent exclusions on the grounds of low income. This should include provisions to ensure requirements such as rent in advance and financial viability checks are not used as barriers to social rented housing for people on low incomes.
- Direct the Regulator of Social Housing to identify the steps taken by housing associations so as not to exclude applicants based on PTCs and instead provide support to enable applicants on the lowest incomes to access social homes.
- Improve data on social housing allocations, for example consider improving CORE Lettings data by asking for demographic information and information on whether properties are let to a homeless household

Thank you for the invitation to respond to the Assembly's investigation. Should you wish to contact us further on this matter, please contact Ben Ridley-Johnson, Senior Policy Officer.

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G15 Response to the London Assembly's Call for Evidence on Allocations in Social Housing

October 2025



About the G15

The G15 is made up of London's leading housing associations. The G15's members provide more than 850,000 homes across the country, including around one in ten homes for Londoners. Delivering good quality safe homes for our residents is our number one priority. Last year our members invested almost £1.5bn in improvement works and repairs to people's homes, ensuring people can live well. Together, we are the largest providers of new affordable homes in London and a significant proportion of all affordable homes across England. It's what we were set up to do and what we're committed to achieving. We are independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Find out more and see our latest updates on our website: www.g15.london

The G15 members are:

- A2Dominion
- Clarion Housing Group
- The Guinness Partnership
- Hyde
- L&Q
- MTVH
- Sovereign Network Group
- Notting Hill Genesis
- Peabody
- Riverside
- Southern Housing

For more information, please contact: G15@lqgroup.org.uk

Executive summary

The G15 welcomes the London Assembly's review of how social housing is allocated in London – the epicentre of England's housing crisis. The limited supply of social homes, spiralling private rental costs, and a shortage of family-sized properties have contributed to widespread and long allocation waiting times. [Research](#) by the Centre for London highlights more than 323,000 households in the capital on waiting lists for social housing, an increase of over 33% since 2017. A shortage of larger properties has also led to particularly high waiting times for family-sized homes, with the wait for 4+ bed properties at 6 years and 3 months – four years longer than the wait for a one-bed property city-wide.

Overcrowding is a particularly acute issue in the capital, with 14.8% of social renting households affected – significantly higher than the private rented sector (9%) and owner-occupiers (1.7%)[1]. These pressures are driving a homelessness crisis, with London Councils now spending £5.5 million a day on temporary accommodation and homelessness support.

Moreover, 2021 analysis by the [National Housing Federation](#) suggests that more than a quarter of a million people in London had housing needs that would be best met by social housing. This figure has almost certainly increased since and highlights the scale of unmet demand across the capital. Therefore, a more consistent and transparent approach to allocations is urgently needed to ensure that limited housing resources are used fairly and effectively.

As major delivery partners, our members collectively house one in ten Londoners, providing homes for people on the lowest incomes and supporting residents to thrive. We have direct experience of how the allocation system operates across boroughs and the challenges this creates for residents and providers alike. Around three-quarters of relets and all new-build nominations are controlled by local authorities, which means that housing associations often have limited input in allocation decisions, despite being responsible for their long-term management and supporting community stability.

We understand that this is a difficult situation for local authorities, who are working to use the allocations process to improve outcomes for residents. However, our members see daily that the current system is not functioning as effectively as it could. Fragmented local approaches, constrained housing supply, and mounting resource pressures have created inconsistent allocation practices between boroughs. As a result, residents with similar needs can experience vastly different outcomes depending on where they live or apply. In some areas, homes are relet swiftly and transparently; in others, long delays and opaque decision-making erode trust in the system and undermine confidence in its fairness.

Local control is a vital principle within the allocations system, but there is scope to better align local discretion with a more consistent pan-London approach. Greater alignment on nominations, turnaround times and data-sharing would help improve efficiency, transparency and fairness for residents. Shared expectations between boroughs and housing associations on nominations, adequate resourcing for allocations teams, and better data-sharing and transparency on decision-making would all strengthen outcomes. A renewed focus on [inter-

tenure] mobility and right-sizing would also make best use of the limited social housing available.

The allocations system should reflect the full diversity of Londoners and support strong, sustainable communities. That means addressing under-occupancy within London's social housing stock. While difficult to solve, the allocations system may offer the most effective route to freeing up larger, family-sized homes and ensuring that social housing is used as efficiently as possible. Robust evaluation is essential to tackling this issue and we support gathering improved data on outcomes, including the number and type of homes freed up, to guide future policy.

We also recognise that the success of the allocations system depends on a well-functioning supported housing sector. Without sufficient supported homes, residents with complex needs are often placed in general needs housing, where their needs are not fully met and community cohesion can suffer. This is particularly an issue in blocks and flatted estates where households live closely together, which is a common feature of social homes in London.

The Mayor's ambition to end rough sleeping by 2030 will only be achievable if services, resources and skilled support staff are in place to provide support for these residents. The G15 encourages the Mayor and the London Assembly to continue pressing central government for long-term, ringfenced funding for supported housing and support services, building on the success of the former Supporting People programme. Development plans should also make provision for supported housing, as current numbers are falling – with one in three providers nationwide closing schemes due to funding pressures and 60% saying they may be forced to close in future. Addressing digital exclusion and improving the accessibility of transfer systems for older and disabled residents must also form part of this approach.

Embedding downsizing incentives into planning is also vital. We believe that exploring a London-wide model whereby housing associations retain a limited number of new-build homes secured through Section 106 agreements – ring-fenced for internal moves to help facilitate downsizing – would support older households to move and free up larger homes more quickly. While some residents may not want to move into new-build properties due to personal preferences, these homes could still enable internal chains, allowing another resident to move and in-turn create a suitable option for a downsizer.

Together, these changes would strengthen fairness, choice and outcomes within the allocations process. While London's housing crisis cannot be solved through allocations reform alone, improving how homes are allocated is central to making the system work better for those in need. G15 members are ready to work with the Mayor, boroughs and government to create a simpler, fairer and more consistent framework that gives residents clarity, makes best use of homes, and supports long-term social and economic outcomes across the capital.

Questions:

To what extent are social housing allocation policies equitable? Are they applied equitably in London?

Members do not find that allocation policies are applied consistently or equitably across London. Outcomes vary significantly between boroughs, shaped by local priorities, political pressures, available resources, and variations in local criteria such as residency requirements or employment-related priority, which can mean that households with similar needs are treated differently). This fragmented approach can limit the system's ability to respond effectively to London-wide housing need, particularly for larger families, adapted homes, and supported housing.

Around 75% of our relets and 100% of new-build nominations are controlled by local authorities, which means housing associations have limited influence over how nominations are applied in practice. While this structure reflects local democratic decision-making and accountability, it can also result in differing approaches and outcomes between boroughs, sometimes leading to inefficiencies or longer void periods. Many nomination agreements are also old; while they might have been fit for purpose at the time, they do not necessarily meet the challenges of the housing environment we operate in today.

We recognise that local authorities are operating under immense pressure. Years of funding reductions, high demand and staff shortages make it difficult for many boroughs to process nominations quickly or maintain up-to-date allocations systems. These pressures inevitably affect consistency and transparency across London, even where intent is fair. Some boroughs can process nominations swiftly, while others face unavoidable delays, which can mean longer waits for residents in urgent need and homes left empty for longer than necessary.

Members would welcome a pan-London shared framework between boroughs and housing associations that improves consistency, promotes transparency and sets clearer expectations on nomination turnaround times, while balancing local priorities with broader regional demand. Establishing minimum standards across London would help ensure policies are better aligned with both local and regional needs.

We also note how councillor and MP enquiries can sometimes result in residents being prioritised for housing ahead of others with equivalent need. This creates a perception - and at times a reality - where those who are more vocal or better connected are housed more quickly, undermining the principle of fairness in allocation.

How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

As local authorities hold the statutory duty for allocations, housing associations have limited influence over who is nominated. However, members report systemic disadvantages.

Digital exclusion is a growing concern, and inconsistent application processes across boroughs can further disadvantage certain groups. Increasing reliance on online systems risks marginalising residents without reliable internet access or digital literacy, creating barriers that reduce fairness and accessibility. In one G15 member area, research found that around one in five households lack internet access, making it difficult to apply or bid for homes and stay engaged with housing moves. More transparent and standardised approaches would improve equity and ensure all residents can access allocations fairly.

Older and disabled residents also face barriers when seeking to move. For example, some cannot find suitably adapted homes or ground-floor units (often due to the lack of availability) and others struggle because the support to manage the move. Members offer practical help where possible, including completing application forms with residents, registering accounts in Housing Jigsaw for those seeking sheltered housing or with medical priority, notifying older persons' services for sheltered housing requests, and adding residents to the medical watch list when a medical move is needed. Despite this support, resources are limited, and these processes can still be challenging for residents

At the same time, allocations are increasingly concentrating residents with higher support needs - including those with mental health and substance misuse issues - into general-needs blocks, whereby they may be better served being allocated a supported housing property, so their needs can be catered for. Better information sharing between boroughs, housing associations and support services is integral to ensuring homes are allocated appropriately and to sustaining tenancies. Without this coordination, placements can undermine community cohesion and place significant strain on management services. This highlights the crisis facing supporting housing, and the need for the Government to provide:

- Emergency funding to prevent further scheme closures
- A sustainable funding solution for support services in supported homes at the Autumn Budget and the forthcoming housing and homelessness strategies
- Enough allocation to the new Social and Affordable Homes Programme (SAHP) so there is funding to build new supported and older person's housing.

Members also note rising perceptions of unfairness within the system among some groups. National (CORE) data for 2023/24 show that 87 % of lead tenants in new social housing lettings were UK nationals and 76 % were White British; these figures provide context to perceptions among some white British residents that allocations may unfairly favour others. This perception risks eroding trust in the system. Transparency about allocation outcomes and why decisions are made would help counter misinformation and support social cohesion.

To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?

Under-occupation remains a major inefficiency in the system. Most members have under-occupancy policies and incentive structures in place to encourage downsizing moves. However, we understand that the current incentive payments (typically in hundreds of pounds per spare bedroom) is too low to motivate moves, and this is typical across London. Some boroughs offer more generous schemes; for example, Camden's pilot Tenant's Option Fund (TOF) offered tenants aged 60 and over £5,000 plus £1,500 per bedroom released to move to a one-bedroom home, leading to a 16% increase in applications to downsize and a 75% increase in the number of downsizing moves via the allocations scheme, according to their [January 2018 report](#). The scheme continues to offer tenants aged 60 and over £3,000 for each bedroom reduction and £1,500 per bedroom for those aged 59 and under. Unfortunately, such initiatives are rare.

The barriers to downsizing are well known; emotional attachment to family homes, lack of suitable alternative properties (especially adapted or ground-floor homes), and limited practical help with the logistics of moving. Even where residents want to downsize, they often cannot find a home that meets their health or location needs.

Members agree that financial incentives alone are insufficient. Successful downsizing schemes combine money with wraparound support, tailored assistance for older residents and those with disabilities, as well as practical and administrative support, including help with packing, removals, and managing bills. They also rely on trusted intermediaries, such as housing officers and community organisations, to build confidence, raise awareness and encourage participation. This integrated approach strengthens boroughs' under-occupation strategies and better encourages residents to move where appropriate. Additionally, offering new-build homes as part of a downsizing incentive has also proven effective, as residents are more willing to move for a higher-quality property. Alongside this, a coordinated campaign to promote the incentives or other housing options – such as mutual exchanges or local authority transfer schemes – could further support mobility. Encouraging residents to register for multiple routes and introducing a single application process that enables them to apply for several options at once would streamline the system and make it easier for people to move.

A coordinated, pan-London approach to mobility – rather than a patchwork of borough-led initiatives – would deliver greater impact. Perhaps the Mayor could explore a London-wide initiative whereby housing associations are able to keep a limited number of new-builds acquired through section 106 agreements to be allocated at the provider's discretion. These properties could be ringfenced as options for residents who want to downsize – increasing the pool of desirable property options into which they could move. Policies that enable transfers into shared ownership or intermediate rent could also help free up social rent homes. Moreover, MHCLG should allocate enough of the new Affordable Homes Programme funding to the building of new supported and older persons' housing.

We also note that policy changes to encourage downsizing must balance the need to free up larger homes with the financial impact of creating additional voids.

How could the Mayor and/or government improve the allocation of social housing in London?

The G15 supports a more consistent, transparent approach to allocations across London. This includes expanding pan-London mobility through mutual exchange (which remains the most effective route for mobility), and Housing Moves, improving digital infrastructure and data-sharing between boroughs and landlords, and standardising IT systems to manage nominations efficiently. Better data-sharing would help reduce void times and support smoother resident moves.

Platforms such as House Exchange HomeSwapper, the latter of which one member processes around 20 exchanges a week through, allow residents to move across landlords and regions without creating voids. While these platforms offer valuable opportunities for mobility, there are also specific issues and limitations that can affect certain residents. For example, while House Exchange offers nationwide swapping opportunities, its public listing can create a safeguarding risk for residents fleeing domestic violence, making it less suitable for these tenants.

We recommend that these improvements are accompanied by clear incentives for boroughs and housing associations to participate, so they can see tangible benefits for their residents. Transparent information and practical relocation support (such as guidance on demographics, costs, and adapting to change) will help build confidence in these moves.

Finally, flexibility in planning mechanisms, including Section 106 and the Community Infrastructure Levy, should be used to support a better mix of homes and encourage right-sizing, ensuring that new-build tenure and bedroom mixes reflect the needs of local waiting lists, making the best use of limited social housing stock.

The G15's *Building Together, Building Better* [guidance](#) for developers highlights that early engagement between developers and housing associations on Section 106 terms is crucial to achieving this. Aligning affordability levels, market restrictions, and nominations agreements with housing associations' lettings policies would help to ensure that homes can be funded, built, and allocated efficiently. Delivery programmes should also be agreed from the outset, with mechanisms to manage changes and ensure accountability. These steps would create a smoother pipeline from planning to allocation and help ensure that new social homes meet both local and pan-London housing priorities.

Do you have any policies that encourage inter-tenure mobility and address under-occupancy? [If so, how effective are these policies at freeing up more social housing]?

G15 members offer limited direct inter-tenure mobility. Members can, for example, signpost social tenants to shared ownership where appropriate, but does not actively manage moves between social and intermediate tenures. Some providers operate their own transfer lists and incentive schemes, but these do not always align with borough priorities or systems, limiting their overall impact. We understand that very few residents who would have qualified for social housing in the first place may find themselves in a situation whereby they could afford to move

to intermediate market rent (IMR) or market rent (MR) properties. Even where residents could afford to move, there is limited incentive to leave lower-cost social housing.

Furthermore, under-occupancy remains under-addressed. While some residents are willing to move, the lack of cross-borough alignment, limited supply of suitable/desirable smaller homes, and low incentives make downsizing difficult, particularly as rent-setting structures can mean that residents moving from a larger home may face higher rents in a smaller property, creating a further barrier to moving. Older residents in particular face practical barriers to mutual exchange, which is often the most effective route. Wraparound support, including help with removals and administrative tasks, would be more effective than financial incentives alone.

Members agree that strengthening inter-tenure mobility would improve overall housing efficiency, but this requires coordination with local authorities and registered providers, standardised processes, better data sharing between partners, and London-wide incentives for moving into smaller homes.

We fully support the Mayor's ambitions to address under-occupancy in the social rented sector, but it is important to recognise that under-occupation is also prevalent in the private rented sector, where affordability constraints and limited suitable alternatives make it difficult for residents to downsize. Tackling this issue across tenures would help make better use of London's overall housing stock.

To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme? How could these programmes be improved?

London's housing shortage amplifies allocation challenges. High demand for a limited supply of family-sized homes and flats skews allocations, often concentrating residents with high support needs (e.g., substance and mental health issues, domestic abuse cases) in blocks and estates in one- or two-bed flats. Consequently, the system creates additional management pressures and risks undermining social cohesion.

Resource constraints and IT infrastructure within boroughs lead to delays in nominations, compounding void loss and slowing residents' moves. Borough-specific practices vary widely, with some controlling all internal transfers and others operating shared arrangements. While local discretion is important, these variations make pan-London consistency difficult and can disadvantage residents depending on where they live.

Members note that out-of-London mobility is underutilised. Residents who might downsize or relocate are often deterred by limited stock, mismatched demand, lack of awareness, and inconsistent borough participation. Out-of-area moves can also result in a loss of social networks or difficulties in accessing jobs and schools. Policies and schemes that actively support such moves, with practical assistance and data-driven guidance, would help address the supply-demand imbalance and build confidence in relocating.

A case study from one of our members shows that around 600 residents are registered for Seaside and Country Homes, yet very few are actually rehoused, highlighting the limited impact of the scheme. Members would like to see Seaside and Country Homes refreshed or better integrated with local borough allocations platforms, with expanded stock options, clearer communication, and improved coordination across boroughs.

Housing Moves plays a valuable role but remains limited in scale, reach, and visibility compared to national platforms like House Exchange. Members also face competing priorities when allocating homes to Housing Moves, including fulfilling local authority nomination obligations, managing internal transfer lists, and minimising void loss to ensure those in need are rehoused quickly. Eligibility rules can also be restrictive, excluding households who could benefit from a move that better matches their housing need. Allowing tenants to use both Housing Moves and House Exchange simultaneously would increase opportunities and support greater cross-tenure and cross-landlord mobility.

G15 supports the Mayor's goal of pan-London consistency and recommends practical steps to achieve this, including standardised IT systems, enhanced data-sharing, and incentives for boroughs and housing associations to participate, ensuring residents benefit from improved mobility options.

[1] [Greater London Authority. \(2024\). Housing in London 2024](#), page 56.

G15 Residents' Group

A forum to unify and promote the resident voice to influence, reform and celebrate social housing

London Assembly Call for Evidence: Social Housing Allocations

G15 Residents' Group Response

October 2025

About the G15 Residents' Group

The G15 Residents' Group (G15 RG) represents residents living in the 880,000 homes owned and managed by London's largest housing associations, which together provide homes for around one in ten London households. Our members bring direct experience of the social housing allocations process – both as applicants and as current tenants. This response draws on our lived experience, practical insight, and ongoing dialogue with our landlords.

We welcome this call for evidence and support the G15's formal response. Our focus is to ensure that **resident voices are embedded in future policy development**, so that lived experience informs and shapes meaningful reform. The current allocations system is complex, inconsistent and emotionally demanding. Reform is urgently needed.

Introduction

The housing system in London is in crisis. While recent government legislation has rightly prioritised and strengthened safety and accountability, it has also created new administrative pressures that can slow progress and divert focus from the Mayor's core housing strategy objective: **to build more homes**.

Our recommendations reflect both the resident experience and an understanding of the wider housing delivery system. We seek to identify solutions that improve the allocations system, ease broader housing pressures to free-up more existing homes and enable new development. We believe that by working together across government, local authorities and other housing providers, we can create a fairer, more transparent and better-resourced allocations system that will make the best use of London's limited social housing and support residents into the right homes for their needs.

Key Issues Identified

1. Inconsistency Across Boroughs

Allocations policies vary significantly between London boroughs, creating a postcode lottery. Residents have shared examples of being removed from waiting lists due to sudden changes in the

criteria, or facing years-long delays simply because they live in a borough with fewer available homes or more fragmented application criteria and process.

2. Lack of Transparency and Communication

Applicants are often not informed about how points are allocated or why they are not progressing on the waiting list. There is little to no communication when priorities shift due to new statutory duties (e.g. the recent London Councils Pan-London Grants programme prioritising the housing of care leavers and abuse survivors), leaving long-term applicants stagnant on the list. This causes confusion, frustration, and demoralisation.

3. Impersonal and Rigid Systems

The allocations process treats people as numbers, not individuals. Residents describe being placed in unsuitable temporary accommodation, denied flexibility around possessions, an impersonal bidding system and forced to move with little notice. It is felt (by those who engage in it) that the system lacks empathy and adaptability. Particularly the need in providing better support and accessible options for older and disabled residents who want or need to move, and focusing on providing adapted homes and help with the moving process.

4. Void Properties and Bureaucratic Delays

Housing associations and councils are not always aligned, leading to delays in filling available homes. Residents cited examples of newly built or refurbished homes sitting empty for months due to slow council responses or poor inter-agency communication.

5. Cross-Boundary Challenges

Housing associations operate across multiple boroughs, but council allocations agreements are often rigid and siloed. This limits the ability to match residents with suitable homes and creates inefficiencies and inequality.

6. Limited Resident Involvement

Despite being directly affected, residents are rarely involved in shaping allocation policies. Their expertise and lived experience are underutilised.

Recommendations

Based on our collective experience, G15RG proposes the following:

1. Standardise Allocations Criteria Across London

Introduce a London-wide framework to reduce postcode disparities, essentially review medical and welfare priority assessments to ensure they are applied consistently and communicated clearly to applicants. This would also help to ensure fairness and transparency in access to social housing.

2. Improve Transparency and Communication

Require councils to introduce shared data systems and transparent reporting between councils and housing associations to improve coordination, reduce void times, and give applicants clearer

information and the ability to give regular updates to applicants, including changes in prioritisation and how these affect their position.

Provide clear, accessible guidance for all applicants on how the system works, what evidence is needed, and how decisions are made. This should include tailored support for people with disabilities, language barriers or limited digital access.

3. Embed Resident Insight in Policy Development and Introduce Resident-Led Reviews

Residents are experts by experience. Their insight must be central to any long-term housing strategy. This includes understanding the lived realities of downsizing schemes, the need to expand mutual exchange and other mobility options so residents that enable residents to move into homes that better suit their needs. Their involvement is essential in co-designing solutions and shaping future housing policy.

A formal mechanism should be established to enable residents to participate in periodic timely reviews of allocations policies. These should be realistic, manageable and monitored by the London Assembly.

4. Streamline Void Management

Develop joint protocols and expectations between councils and housing associations to ensure voids are filled quickly and efficiently—reducing waiting lists and financial loss.

5. Support Cross-Borough Collaboration

Develop formal agreements that allow housing associations and councils to share or exchange nominations across boroughs, so homes can be let more quickly and residents have a wider range of options, including local connection requirements so they do not unfairly prevent residents from accessing homes that meet their need.

6. Expand and Promote Downsizing Incentives

Standardise financial and practical support for residents willing to downsize or move out of London. This would free up larger social homes for families in need.

Ensure funding mechanisms support the delivery of larger, family-sized social homes.

Current grant structures make it harder for housing associations to deliver larger homes, even though these are in highest demand. We support the G15's recommendation to review grant rates so that funding better reflects the cost of delivering family homes.

7. Improve Strategic Partnerships with Housing Associations

Housing associations are not-for-profit organisations with the capacity to build new social homes and foster inclusive communities. The London Assembly should continue to encourage councils and housing associations to plan and build together, rather than compete for land or funding. Joint development and partnership planning would make better use of resources and help deliver more affordable, high-quality homes.

Conclusion

The current allocations system is fragmented, unclear, and often fails to meet the needs of those it aims to serve. Those who engage in it find it to be unbalanced and inconsistently applied. As residents we are the active contributors to London's communities, and we are seeing the quality of life for Londoners diminishing.

A lack of transparency and consistency in the allocations process is having a profound impact on people's lives and reshaping the cultural fabric of London. The decline in social housing, rising living costs, and the falling number of children living in the capital are symptoms of a system that is failing to adapt. These trends threaten the inclusivity and diversity that define London.

Without urgent reform, the consequences will deepen: communities will fragment, opportunities will narrow, and London risks becoming a less healthy, less inclusive place to live. Pan-London grants to support Londoners in crisis are vital, but to succeed, they require robust cross-agency support.

We urge the London Assembly to treat this call for evidence as the beginning of a deeper partnership with residents—those who live the realities of social housing every day. Together we can co-create a fairer, more effective allocations system that **delivers safe, secure, and suitable homes for all Londoners.**

The G15 Residents' Group

5. What are the main challenges allocating social housing in your borough?

The main challenges allocating social housing in our borough are the lack of available and suitable social and affordable housing within the borough, particularly family sized homes and homes suitable for disabled applicants. Balancing the housing needs of applicants on the housing register (home seekers and transfer applicants) and of homeless households is also a key challenge, as is rehousing survivors of domestic abuse.

6. How does your borough ensure that your allocation policies are equitable?

We are completing an EQIA for the review and we will put in place a new framework to better capture the outcomes of our new Social Housing Allocation Scheme, to identify any areas of disproportionality. We also gain insight through applicants requesting reviews, customer feedback (including complaints), councillor enquiries, MP enquiries, and feedback from RPs and other stakeholders. We of course take into account any changes to guidance and legislation.

7. How does your borough hear from residents to improve the allocation process?

We are currently consulting on our Social Housing Allocation Scheme. We gain insight through applicants requesting reviews, customer feedback (including complaints), councillor enquiries, MP enquiries, and feedback from other stakeholders (such as VCS organisations who represent specific groups).

8. Do you have any policies that encourage inter-tenure mobility and address under-occupancy?

We have a Mutual Exchange policy and we have an Under-Occupation Incentive (which a dedicated officer). We are just relaunching our Grants to Move scheme, to support secure council tenants into home ownership (shared ownership or open market) if they give up their council tenancy.

If so, how effective are these policies at freeing up more social housing?

For under-occupation, the anecdotal feedback is that support with handholding tenants through the stress of moving is important, perhaps more so than cash incentives. We currently give under-occupiers priority on the register without penalties for refusals or lack of bidding, so in practice they often remain on the register for quite a long time.

9. How do your allocation policies reflect the Mayor's Housing Strategy?

We take into account new guidance and legislation when developing or reviewing our policies and strategies, including the Mayor's strategies.

10. To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme?

We do publicise both schemes to our residents, for example on our website and in housing options leaflets.

We will need to check with colleagues about usage and come back to you about this.

How could these programmes be improved?

We will need to check with colleagues and come back to you about this.

11. How could the GLA and/or government better support local authorities with social housing allocation in London?

- Support to increase the supply of genuinely affordable housing
- Increase in the supply of housing for disabled applicants- perhaps a sub-regional or pan-London scheme to assist with matching supply and demand
- Guidance on good practice with Social Housing Allocations Schemes and Housing Registers in response to common issues and concerns across London
- Support with rehousing victims of domestic abuse, in order to ensure they retain the same security of tenure (this is challenging in the context of lack of supply and lack of turnover/mobility)
- Innovation and digital solutions to housing options advice

Merton Council Call for Evidence Submission

1. To what extent are social housing allocation policies equitable? Are they applied equitably in London?

The nature of housing allocation is that they are governed by legislation and that certain groups (those with reasonable preference) receive a 'helping hand' over those without such preference. This is a legitimate means of helping those most in need, which is all the more important given the lack of supply. As a result we would say that schemes are equitable. However, perceptions from the wider public are likely different who may view certain groups as getting preferential treatment.

2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

As noted above, in many cases those without reasonable preference are increasingly unlikely to ever be housed given that supply is insufficient to meet those who do have preference. Some groups will be less likely to have larger families and will therefore suffer lower levels of overcrowding and therefore priority, and will be less likely to receive an offer. This is more likely to affect those living with friends and family but are not threatened with homelessness, or those living in potentially expensive private sector accommodation, but are otherwise adequately housed.

3. To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?

We frame our allocations policy around prevention with a view to prioritising those groups that are likely to go into temporary accommodation. If this was wider spread we consider that homelessness (in terms of the numbers in temporary accommodation) would likely be lower, particularly if they are given an equivalent or higher priority than those in temporary accommodation.

Under-occupation schemes remain an important tool for freeing up additional properties.

4. How could the Mayor and/or government improve the allocation of social housing in London?

The overriding issue is supply as opposed to an issue with allocation itself.

5. What are the main challenges allocating social housing in your borough?

Again supply is by far the biggest issue

6. How does your borough ensure that your allocation policies are equitable?

We monitor allocations in a year report. This will note a breakdown by band, ethnicity and area.

7. How does your borough hear from residents to improve the allocation process?

We do not have a specific mechanism for this, except where we make a major policy change in which case there is a consultation

8. Do you have any policies that encourage inter-tenure mobility and address under-occupancy?

We do operate an under occupation scheme as party of our housing association transfer register

9. If so, how effective are these policies at freeing up more social housing

The scheme is useful but there is a high level of offer refusal as you need to make attractive offers to applicants who have lived in family homes for many years

10. How do your allocation policies reflect the Mayor's Housing Strategy?

As noted above Merton's scheme is prioritises prevention of homeless and therefore contributes to the Mayors aim to tackle homelessness and help rough sleepers

11. To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme? How could these programmes be improved?

We are part of the scheme despite being a non-stock owning authority

12. How could the GLA and/or government better support local authorities with social housing allocation in London?

Government and the GLA needs to provide more information to applicants about how realistic it is to receive an offer of social housing given the extreme scarcity of accommodation and promote alternative housing options widely. We all support the building of new Council and housing association homes, but this will take time to deliver. Many people believe when they join a register they will get an offer when they actually have little prospect of doing so and strategically we all need to be clear about what message we are sending out so we can all effectively manage expectations across the capital. This is particularly crucial around Part VII homeless applicants as many will be in temporary accommodation for years and will likely be offered private sector accommodation as an outcome.

31 October 2025

Written evidence submitted to the London Assembly investigation on 'Allocations in Social Housing' by Dr Rosalie Warnock (King's College London), Professor Katherine Brickell (King's College London), Sam Pratt (Shared Health Foundation), Isabel Kaner (Shared Health Foundation) and Amanda Roestorf (Autistica)

Introduction

'When you're neurodivergent or supporting neurodivergent children, it's not just about having a roof – it's about routine, regulation, and feeling safe. None of that exists in [temporary accommodation], and we're doing everything we can just to hold things together'

(Neurodivergent married/partnered mother of two neurodivergent children and one neurotypical child, currently living in TA)

This submission focuses on the experiences of homeless families with neurodivergent children living in temporary accommodation (TA). The findings of our first-of-its-kind national call for evidence reveal the particular ways that housing allocation policies are disproportionately affecting and disadvantaging families with neurodivergent children.

In London, 92,140 children are currently homeless and living in TA.ⁱ 1 in 7 children in the UK are estimated to be neurodivergentⁱⁱ, which means at a minimum there are around 13,162 neurodivergent children currently living in TA in London. However, as neurodivergence is often thought to be genetic, it is likely that this figure is considerably higher because there are multiple neurodivergent children (and adults) in some families. In our call for evidence (discussed below), 79% of children and young people aged under 18 were neurodivergent.ⁱⁱⁱ This means we can reasonably estimate **that there are between 13,162 and 72,791 neurodivergent children living in TA in London.**

Currently, no local authority housing allocation policies in England explicitly mention or account for neurodiversity. This means there is no legal guidance for how to support and house neurodivergent children and their families. While the statutory guidance states that 'reasonable preference' should be given to a) people who are homeless and d) people who need to move on medical or welfare grounds, including grounds relating to a disability^{iv}, the lack of attention to neurodiversity highlights unequal weighting of non-visible disabilities.

Stays in TA need to be as short and safe as possible given the detrimental physical and mental health impacts of homelessness and insecure and inappropriate accommodation. Yet our data shows that key barriers to short(er) stays for families with neurodivergent children are delayed and inadequate housing needs assessments, and difficulties proving priority need for children/young people with non-visible disabilities.

This submission recommends to the London Assembly to:

- (1) Fund and allocate family support workers either before or as soon as a family becomes homeless. Family support workers should be trained in neurodiversity and trauma-informed approaches. They should recognise that a neurodivergent child is likely to have at least one neurodivergent parent and so should work flexibly and in a neuroinclusive manner with parents to ensure that families with neurodivergent children are housed as soon as possible.
- (2) Issue London-wide guidance on best-practice use of TA for families with neurodivergent children (including priority allocation of in-borough, ground-floor, self-contained TA properties).

- (3) Ensure that a thorough needs assessment is conducted either before or as soon as is practically possible once a family becomes homeless. This should consider neurodivergent children's practical, space, safety and sensory needs, and the needs of their siblings and parents/carers, in allocation considerations. This assessment should be conducted by an impartial and professionally qualified occupational therapist with a thorough understanding of neurodivergence and frequently co-occurring conditions.
- (4) Recognise the difficulties families face in obtaining medical/professional evidence of their child's neurodivergent needs, especially when they are hyper-mobile due to homelessness. Help families who are struggling to collect this evidence by fast-tracking needs assessments for families already living in TA where children are known to be or suspected to be neurodivergent, so that quicker changes can be made to their accommodation/banding levels where necessary.
- (5) Prioritise families with neurodivergent children for social housing. Avoid the use of probationary tenancies to ensure families are protected from eviction on the grounds of noise complaints directly relating to their children's neurodivergent needs and behaviours.
- (6) Prioritise or reserve ground floor and adapted properties for families with neurodivergent children, and especially those with secure gardens.
- (7) Prioritise families with neurodivergent children for in-borough placements that keep them within easy distance of schools, GPs, and social/support networks. This could also offer a cost saving to London Boroughs given the escalating costs of home-to-school travel for children with SEND.
- (8) Improve London Borough data collection so that councils can know and monitor who is impacted by allocation policies they have put in place. Require boroughs to code "neurodivergent child in a household" in housing IT systems within 12 months. This is a key starting point to ensuring equity.

Evidence description

Sensory Lives is a 24-month academic project (January 2025 – December 2026) which examines how neurodivergent children and their families experience life in temporary accommodation (TA).¹ Between March and October 2025, we interviewed 13 parents (all mothers) who currently or have recently lived in TA with a neurodivergent child in London and Greater Manchester. We also conducted experimental, creative research with four of their children.²

From May to August 2025, KCL, in partnership with the All-Party Parliamentary Group for Households in Temporary Accommodation (APPG HTA), the Shared Health Foundation, and Autistica, ran the first ever national call for evidence into the experiences of families living in TA with neurodivergent children. We received 61 submissions from across the UK (England: 56 (32 from Greater London); Scotland: 3; Northern Ireland: 1; Wales: 1) and engaged a further 26 participants in preliminary focus groups to shape the call. The evidence presented here draws mainly from the findings of the national call. The official report will be published in January 2026.³

¹ The Sensory Lives project is run by Professor Katherine Brickell and Dr Rosalie Warnock at King's College London, in partnership with the Shared Health Foundation. It is funded by the Leverhulme Trust with additional support from Research England. All primary research has been approved by the KCL High Risk Ethics Committee.

² See <https://www.sensorylivesproject.org/>

³ See <https://www.sensorylivesproject.org/national-call-for-evidence>

To what extent are social housing allocation policies equitable? Are they applied equitably in London?

We cannot properly assess how equitable social housing allocation policies are for neurodivergent children and their families because there is no data or guidance on this. Currently, no local authority housing allocation policies in England explicitly mention or account for neurodiversity. This means that there is no legal guidance for how to equitably support and house neurodivergent children and their families.

The statutory guidance on social housing allocations states that ‘reasonable preference’ should be given to a) people who are homeless and d) people who need to move on medical or welfare grounds, including grounds relating to a disability^v, with medical and welfare grounds defined as ‘includ[ing] people with a learning disability as well as those with a physical disability’^{vi}. The lack of attention to neurodiversity highlights a lack of attention to and unequal weighting of non-visible disabilities. This is an equality and children’s rights issue.^{vii} Our data supports this, with one submission commenting that:

There is a noticeable difference in the treatment of families with children who have recognisable physical disabilities, compared to families where children are neurodivergent but do not need adapted properties. As an organisation we see Local Authorities will often be slightly more proactive in obtaining in-borough allocations for families with children who require wheelchair access or can evidence a ground floor need, compared to families (even where children have severe autistic spectrum disorder) with neurodivergent children. It appears there is more understanding of, and therefore more support offered to, families with children with physical disabilities, compared to neurodiverse families, possibly due to a lack of statutory understanding and guidance.

(Charity/third sector respondent)

If there is scope for housing officers to interpret the allocations guidance differently for children with physical, visible disabilities, and for children with non-visible disabilities (including but not limited to neurodiversity), then neither housing needs assessments nor housing allocations policies will be equitable in their current forms.

Are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

Our data indicates that families with neurodivergent children are disadvantaged by allocation policies both when they are homeless and living in TA, and when they have been placed in social housing but it does not meet their needs. There are four specific ways that disadvantage happens:

1) Housing needs assessments

Our data evidence multiple ways that neurodivergent children and their families are affected by living in TA. Yet **80% of parent/carers respondents (16/20) reported that their housing officer had never asked about/accommodated their neurodivergent child’s needs when allocating TA/housing.** Just two parents/carers (10%) said they had been asked. One did not know, and one did not say. But neurodivergent children living in TA struggle with the mental and physical health impacts of:

- uncertainty
- frequent moves
- changes to/a lack of routine
- moving away from familiar places
- moving schools or travelling long distances back to school
- a lack of cooking/refrigeration options restricting access to sensory-safe diets,
- environmental sensory overload (e.g. from lights, smells, noises, lack of space to self-regulate)

Submissions also make regular mention of increased rates of self-harm amongst neurodivergent children in TA, especially amongst children/young people who are non-verbal or have other communication difficulties.

The above evidences significant mental and physical health reasons why neurodivergent children and young people should spend as little time in TA as is possible. However, our data suggest that families can wait months or years for their needs assessment; it may then take place over the phone without the housing officer viewing their living situation or meeting their neurodivergent child; and that subsequently, needs assessments regularly fail to take account of the full impacts of neurodiversity on a family. If needs assessments are inadequate, delayed, or not acted upon, the consequences can be severe and include involuntary family separation:

"My other two children are staying with their father as we have been placed in a one-bedroom even though they [the Council] have had a written letter from her paediatric doctor stating because of her needs she needs her own room and outside space she doesn't have any of this.

(Single mother with three children, currently living with her one neurodivergent child in TA)

When needs assessments *do* capture neurodivergent children/young people's specific longer-term housing needs, they may still struggle to recognise the additional immediate mental and physical health risks that living in TA poses for neurodivergent children/young people. If those needs are not recognised, it is hard for families with neurodivergent children to prove need for priority banding:

We find that medical needs assessments do look at the future housing needs of neurodivergent children, for example a need for their own bedroom or a property on the ground floor where safety is a concern, but do not reflect the urgency of the need to move from temporary accommodation. We have found in Hackney in particular that no priority is given for an urgent need to move on medical grounds, which limits the options for families who are housed unsuitably to move from temporary accommodation into stable homes.

(Charity/third sector respondent)

2) Priority banding for social housing

Our data indicates that families with neurodivergent children often struggle to prove their need for priority banding for social housing. As one social prescriber commented:

I think there are difficulties with getting across non-physical needs in terms of eligibility as the ""priority need"" is still very skewed to things you can easily ""evidence"" - it is very difficult to ""evidence"" that your child can behave well at school but might melt down nightly at home. If neurodiversity were recognised more fully in this framework, that would help.

(Social prescriber submission)

For example, even when a neurodivergent child has been assessed as needing their own bedroom, and a lack of space is having significant mental, physical and safety risks for the child and their family members, submissions reported that they were still not being prioritised for social housing that met their needs. One family, who had previously lived in both Home Office TA, were not prioritised because they did not live in social housing, but it did not meet their needs. They had been stuck in this situation for over eight years:

We are a family of five with a child with special needs, living in a two-bedroom flat for more than 8 years.

(Married/partnered father with three sons aged 13 - 7. 10-year-old is neurodivergent and he suspects the other two children might also be neurodivergent, currently living in social housing)

3) Accessible properties

In our call for evidence, 99 submissions referred to inadequate/inappropriate space, design and standards of TA accommodation, which was unsafe for neurodivergent children. For children who are very active/need to move around a lot to self-regulate, restricted spaces can cause injury:

'My child spins around a lot and has no awareness of space, he will bang into the table or door as he doesn't look where he is going. In the TA, the spaces are too small. The kitchen has no door and there are knives in the drawers that he can open, and I worry for his safety. I have to watch him 24/7 and as a result, it is difficult for me to sleep'

(Mother with one neurodivergent child, currently living in TA)

Other submissions reported the dangers of being placed in TA in high-rise buildings, and/or with insecure windows and balconies:

"Now the council have allocated me a temporary flat but it's not that safe for my daughter. It's not even permanent. It's temporary and private rent. Moving too much has big impact on kids with special needs. The flat is high up which is very, very unsafe for my daughter. We were hoping it would be a bit safer for her. As soon as we got here, she said "mummy, one day I'll jump over the window." She has tried to open it. Sometimes you're in the kitchen, she opens the door and goes outside. If anything happens to my daughter now, I will be held responsible.

(Mother with three children, one of whom is neurodivergent, currently living in TA)

In other cases, families may have accepted permanent social housing – fearing a longer wait, or being declared intentionally homeless if they did not accept it – but it was not safe or accessible for their children. One parent reported that:

"There were steep steps that I had to carry a wheelchair up and down every day as my eldest got a travel assist taxi to school. I have my own health issues which made this more dangerous. The council said that I accepted the flat so it must be okay, but I hadn't seen the stairs and how steep and narrow they all were, as I wasn't allowed to view the property before"

(Mother with two neurodivergent children, current housing situation unknown)

Another parent reported that:

It's like living in a prison for the child and his siblings and us as his parents. He is ten years old and very active. He needs access to an outdoor space which he doesn't have. He needs adaptation and council refused to fund initially but finally 80% completed three years after completion of assessment! Some of requested adaptation were rejected when we placed the request. We live in a flat on the 4th floor.

(Married/partnered father with three sons aged 13-7. 10-year-old is neurodivergent and he suspects the other two children might also be neurodivergent, currently living in social housing)

It is essential that families with neurodivergent children are prioritised for spacious ground-floor flats with separate kitchens, and ideally with secure gardens. The consequences of failing to house neurodivergent children who are known to be living in high-risk environments could be fatal.

4) Priority for in-borough placements

In our call for evidence, 53 submissions mentioned the ways that living in TA can impact on neurodivergent children and their families' support networks. **Families with neurodivergent children are reliant on local support networks (of friends, families, schools and organisations) for survival.** Families with neurodivergent children are at significant disadvantage if they are placed out-of-borough in TA or more permanent social housing. This is particularly the case for single-parent families.

For some families, moving into TA and out-of-area meant moving away from family/friends who they relied on for support and who form/formed an important part of that child's network and routine. This often meant they had no easily accessible adult caring support at a time when their children were becoming increasingly dysregulated and distressed:

'Since she had been very small, she was used to a routine of having extended family supporting us... All of that stopped and behaviours that had become manageable were no longer, ritualistic behaviour became more entrenched, the support wasn't there, routines couldn't happen, the only friend she had she couldn't see any more. It put a huge strain on my family to continue to provide even very basic support and made me very unwell as no one slept'

(Married/partnered parent with one neurodivergent child, currently living in social rented housing)

Many neurodivergent children struggle with travel, specifically with the logistics, smells, sounds, feel and unpredictability of public transport. 53 submissions mentioned the impacts that living in TA has on neurodivergent children's access to education. Most commonly, this was because neurodivergent children/young people could not cope with travelling long distances back to school. For most, moving to a closer school was not an option; either because they had an EHCP in place, or because their current setting was mid-way through applying for an EHCP needs assessment for them, or because the school was trusted and safe, and provided a point of stability for that child at a time of acute displacement and change:

'My daughter completely refused to go to school. We had to travel an hour and a half to get to school every morning. Her attendance dropped from 70% to below 40%'

(Single mother with one neurodivergent child, currently living in TA)

One of the biggest issues for families moving across local authorities/boroughs is accessing SEND support (assessment/diagnosis, therapeutic services or EHCPs) because children/young people lose access to existing support services and/or drop off waiting lists for assessment/support:

'In addition to SEN education and transport, moves between boroughs also often presents the challenge of children having to access and be assessed by new healthcare providers/NHS trusts. This often means losing places on waiting lists, having to be placed at the bottom of new waiting lists, leading to further time without support or diagnoses (often crucial for accessing further support)'

(Charity/third sector submission)

4 of the 13 parents we interviewed had become homeless when they fled domestic abuse. This situation is even more complicated when it involves a neurodivergent child.

One of the 13 parents we have interviewed fled domestic abuse with her two children, one of whom is neurodivergent. LB Lewisham placed her in TA another London borough (unnamed for anonymity of parent). The children still have contact with their father. Her neurodivergent child has an EHCP and it is essential that they remain in their school, which is in a third borough. However, it takes them over an hour each way to travel from their TA to the school. Social services have recently decided the distance to school is too far for the children and awarded their father custody of the children during the school week. Their mother now only has custody of the children at the weekends. **LB Lewisham is responsible for a social services decision to restrict maternal custody because they have knowingly placed the family in TA away from the children's school and support networks.**

Even though the family fled domestic abuse, the mother cannot regain primary custody of her children until she is allocated TA or social housing closer to the children's school. Her current TA is a two-bedroom flat and she has been advised by her solicitor to exercise caution, because now she has lost custody of her children from Monday – Friday, she could be considered to have a bigger TA flat than she needs. If she were reassessed as being a single person, she could be moved into a hostel, and then she would definitely lose custody of her children because it would be determined that she did not have space for them to live with her. **The allocations system, coupled with social services, disadvantages mothers whose neurodivergent children who must stay in the same school, and gives preference to perpetrators of domestic abuse who remain in the family home.**

How could the Mayor and/or government improve the allocation of social housing in London?

In the call for evidence, we asked parents/carers **“What are the biggest things that you think would make a difference to you and your family?”** One parent responded:

‘An adapted, or easily adaptable, social home, which is the security my family needs, that meets the needs of my children so they can thrive instead of only survive. [It should have] a garden so they can enjoy outside without becoming overwhelmed by public spaces. Also, if TA must exist, place families in the right TA first time. Find a way to stop councils from moving people every 28 days. Make sure that when changes arise plenty of time is given for the children to prepare not a few hours, more like days. Make sure there’s no shared facilities. Be treated with compassion by council staff’

(Mother with two neurodivergent children, currently living in TA)

This submission recommends to the London Assembly to:

- (1) Fund and allocate family support workers either before or as soon as a family becomes homeless. Family support workers should be trained in neurodiversity and trauma-informed approaches. They should recognise that a neurodivergent child is likely to have at least one neurodivergent parent and so should work flexibly and in a neuroinclusive manner with parents to ensure that families with neurodivergent children can navigate the allocations system and are housed as soon as possible.
- (2) Issue London-wide guidance on best-practice use of TA for families with neurodivergent children (including priority allocation of in-borough, ground-floor, self-contained TA properties).
- (3) Ensure that a thorough needs assessment is conducted either before or as soon as is practically possible once a family becomes homeless. This should consider neurodivergent children’s practical, space, safety and sensory needs, and the needs of their siblings and parents/carers, in allocation recommendations. This assessment should be conducted by an impartial and professionally qualified occupational therapist with a thorough understanding of neurodivergence and frequently co-occurring conditions.
- (4) Recognise the difficulties families face in obtaining medical/professional evidence of their child’s neurodivergent needs, especially when they are hyper-mobile due to homelessness. Help families who are struggling to collect this evidence by fast-tracking needs assessments for families already living in TA where children are known to be or suspected to be neurodivergent, so that quicker changes can be made to their accommodation/wait list banding levels where necessary.
- (5) Update housing allocations guidelines to prioritise families with neurodivergent children for social housing. Avoid the use of probationary tenancies to ensure families are protected from eviction on the grounds of noise complaints directly relating to their children’s neurodivergent needs and behaviours.
- (6) Update housing allocations guidelines to prioritise or reserve ground floor and adapted properties for families with neurodivergent children, and especially those with secure gardens.
- (7) Update housing allocations guidelines to prioritise families with neurodivergent children for in-borough placements that keep them within easy distance of schools, GPs, and social/support networks. This could also offer a cost saving to London Boroughs given the escalating costs of home-to-school travel for children with SEND.^{viii}

- (8) Improve London Borough data collection so that councils can know and monitor who is impacted by allocation policies they have put in place. Require boroughs to code “neurodivergent child in a household” in housing IT systems within 12 months. This is a key starting point to ensuring equity.

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31 October 2025

Endnotes

ⁱ <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-april-to-june-2025>

ⁱⁱ <https://www.gov.uk/government/news/more-support-for-neurodivergent-children-in-mainstream-schools>

ⁱⁱⁱ This is consistent with pilot research conducted by Bridges Outcomes in LB Hackney in November 2024, where over 70% of children across the 35 households in TA were neurodivergent.

^{iv} Section 4.4, Allocation of accommodation: guidance for local authorities. MHCLG. Last updated 18.09.25.
<https://www.gov.uk/guidance/allocation-of-accommodation-guidance-for-local-authorities>

^v Section 4.4, Allocation of accommodation: guidance for local authorities. MHCLG.

^{vi} Section 4.9, Allocation of accommodation: guidance for local authorities. MHCLG.

^{vii} Equality Act 2010; Children's Act 2004, Section 11

^{viii} <https://committees.parliament.uk/work/9281/hometoschool-transport/>

30 October 2025

Written evidence submitted to the London Assembly investigation on 'Allocations in Social Housing' by Professor Katherine Brickell (King's College London), Dr Mel Nowicki (Oxford Brookes University/King's College London), and Fraser Curry (King's College London)

Introduction

'You can't bid because you're in the red'

Single mother and domestic abuse victim living in Temporary Accommodation

This evidence submission focuses on debt-related disqualifications found in London Borough policies on the allocation of social housing. Our systematic analysis of all local authority allocation policies in England, nation-wide Freedom of Information requests, and in-depth qualitative research with families, reveals how debt-related disqualifications are negatively impacting access to social housing for low-income single mothers and domestic abuse victims living with children in Temporary Accommodation (TA).

Stays in TA need to be as short and safe as possible given the detrimental physical and mental health impacts of homelessness and insecure and inappropriate accommodation. Yet our research evidence shows that a key barrier to short(er) stays are the rent arrears inhibiting a household's transition out of TA and into a secured social housing tenancy. Women and children, including domestic violence victims, can remain in limbo in TA until they can reduce or clear their rent arrears, or in some cases, prove their 'intent to pay'.

Latest MHCLG data for London (April–June 2025) reports that:

- 26,200 single women with dependent children are living TA – representing 35% (1 in 3) of all 74,720 households in London.
- 1,290 households were owed a relief duty because of being a victim of domestic abuse – representing 1 in 5 of all households in England.
- 380 households were owed a relief duty because of rent arrears – representing 1 in 4 of all households in England.
- 97,140 children are living in TA – representing over half (56%) of all 172,420 children in England.
- 94% of all households in England who have been living in TA (all types) for 5+ years live in London.

London councils are spending a £5.5 million every single day on TA for homeless households.ⁱⁱ Delayed move-on is not only damaging to health and well-being; it is also an inefficient and ineffective expenditure of public money given the large and accelerating costs of TA to London Boroughs. What our research shows is that London is the epicentre of a broken housing system, designed to manage scarcity by exclusion rather than need. In 2019 the Chartered Institute of Housing raised concerns in this regard, 'about rationing processes, particularly in relation to decisions about who gets access to waiting lists, how those who do get access are prioritized and the potential for pre-tenancy activity to exclude those most in need of social housing'.ⁱⁱⁱ Their *Rethinking Allocations* report is clear that, 'ensuring tenancies are sustainable is important, but activity to help achieve this is undermining efforts to house those who need homes the most'. The relationship between allocation policies and housing-related debt require a rethink in the context of an ongoing cost-of-living crisis and rises in homelessness, and particularly in relation to victims of domestic abuse. Allocation policies that include blanket disqualification policies for those in housing-related debt therefore risk vastly limiting access to social housing for some of society's most vulnerable: children, low-income single mothers, and domestic abuse victims.

This submission recommends to the London Assembly to:

- (1) Ensure that all London Borough housing allocation policies include the following clause to avoid acting unlawfully.

‘[NAME OF LONDON BOROUGH] is committed to ensuring that victims of domestic abuse are not unfairly prejudiced under this allocations scheme. When applying [REFER TO RULES CONCERNING QUALIFICATION AND PRIORITY THAT RELATE TO DEBT], [NAME OF LONDON BOROUGH] will not have regard to any debts that have arisen in consequence of domestic abuse’^{iv}

- (2) Recommend to Government regulation change titled ‘The Allocation of Housing (Qualification and Priority Criteria for Debts Related to Domestic Abuse) (England) Regulations’. Already drafted by a barrister for this purpose, these regulations require local authorities to disregard domestic abuse-related debts when deciding what classes of persons do and do not qualify for an allocation of housing, and when deciding what priority to award in respect of an allocation of housing. They provide that a local authority may not disqualify applicants for an allocation of housing on the basis of past or current debts, where such debts were accrued in connection with domestic abuse.
- (3) Improve London Borough data collection so that councils can know and monitor who is impacted by allocation policies they have put in place. This is a key starting point to ensuring equity.
- (4) Ensure that allocations are considered as part of actioning the London Domestic Abuse Safe Accommodation Strategy 2025-2028 and the ‘whole housing approach’ it aims to take. While access to services and accommodation are core concerns of the strategy, it does not mention housing allocations at all.

Evidence description

On 17 October 2023, the All-Party Parliamentary Group for Households in Temporary Accommodation (APPG HTA) hosted the launch of the research report ‘The Debt Trap: Women’s Stories of Navigating Family Homelessness and Temporary Accommodation in Greater Manchester’ (Brickell and Nowicki 2023).^v Building from 18-months of repeat interview research with the same 13 women who have dependent children (once) living in temporary accommodation, the findings in this report show (1) how debt is a major factor why families become homeless, (2) how economic abuse contributes to homelessness (3) that debt worsens during stays in temporary accommodation, and (4) it then continues to impact on families’ futures even when homelessness ends.

Between January and March 2024, King’s College London/Oxford Brookes University (Brickell, Nowicki and Curry 2024) analysed the housing allocation policies of all 294 local authorities in England – this figure excludes 21 county councils. It also submitted FOI requests to the 294 local authorities to establish how many households in temporary accommodation nationally have been impacted by housing-related debt disqualification rules in their respective housing allocation schemes. This was specific data for 1 month (December 2023). A data pack of key statistics from both the policy analysis and the FOI replies was published from this research.^{vi}

In October 2025, on World Homeless Day, the book [Debt Trap Nation: Family Homelessness in a Failing State](#) was published based on three years of research.^{vii}

To what extent are social housing allocation policies equitable? Are they applied equitably in London?

The policy analysis evidences how widespread debt-related disqualification and deprioritisation rules are in London Borough housing allocation policies.

- 91% of London's 32 Boroughs have a debt-related disqualification clause in their housing allocation policies (this is in comparison to 88% in England).
- 13% of London's 32 Boroughs have a debt-related deprioritisation clause in their housing allocation policies (this is in comparison to 54% in England).

The subsequent Freedom of Information requests to London Boroughs for 1-month of data (December 2023) reveals how London is the numerical epicentre of debt disqualifications in social housing allocations in England. In London, indications are that the application of debt-related disqualification rules vary significantly in frequency; however, data provided by London Boroughs is lacking on this. Half of London's 32 councils failed to provide data, often replying that they "do not hold this information" or that a time-consuming "manual search" or "trawl" would be required to get it. Disaggregated data on the number of children impacted by debt-related disqualifications was almost impossible to access through the FOI process. Ealing is a rare example of a London Borough who could and did provide disaggregated data. It reports a very high number (628) of children in TA impacted by debt-related disqualification rules. Ealing stands out as the known tip of what might be a London iceberg.

If London Boroughs cannot or will not track the impact of their own allocation policies on different cohorts (e.g. domestic abuse victims, children) how can they know or monitor their (inequitable) impact?

FOI data on the disqualification of households

- 79% (3,015) of disqualified households in temporary accommodation in England (3,797) lived in a London Borough.
- 49% of households in England impacted by disqualification rules come from just 3 London Boroughs.
- Ealing, Westminster and Lambeth reported the highest numbers of households impacted by debt-related disqualification: 994, 567, and 318 respectively.

Disqualification of households with children

- 44% (1,318) of disqualified households in London included at least one child under the age of 18.
- 4% (106) of disqualified households included a child who is 2 years old or under.
- Of the boroughs who reported the highest numbers of households affected, Westminster and Lambeth were unable to provide responses to how many children under the age of 18, and under the age of 2, were impacted by disqualification rules.
- Ealing reported 628 disqualified households with children in temporary accommodation under the age of 18; and 32 children under the age of 2.
- In Ealing 63% (two-thirds) of all disqualified households included a child under 18.
- Westminster and Lambeth were unable to provide responses to how many children under the age of 18, and under the age of 2, were impacted by disqualification rules.

*All these totals are a significant underestimate given that 18 out of the 32 London Boroughs failed to provide figures in their responses to our FOI.

Are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

The data indicates that children, low-income single mothers, and domestic abuse victims living in TA are disadvantaged by housing-related debt disqualifications in allocations policies. What this looks like in practice are these vulnerable cohorts trapped in TA for a long(er) time.

If local authorities are excluding domestic abuse victims from allocations lists based on housing-related debt, and that debt is a direct consequence of domestic abuse, then that is discriminatory and therefore unlawful under the Equality Act 2010. Rent arrears and other housing-related debts are commonly accrued as a consequence of economic abuse. This can be directly through perpetrators not paying rent, or lying about paying rent, or indirectly through controlling the victim's access to money, meaning that they are unable to afford the rent and other household costs. Household finances and debt have long been a pervasive tool for perpetrators of domestic abuse to control and coerce their victims. In a legal first, the Domestic Abuse Act (2021) for England and Wales, recognises and defines economic abuse. Surviving Economic Abuse research has found that one in six women in the UK has experienced economic abuse from a current or former partner. Their research also shows that 95% of domestic abuse victims have experienced economic abuse, with 60% experiencing coerced debt as a result.^{viii}

London Boroughs should be explicitly exempting all victims from these rules to avoid acting discriminatorily. **Although 30/32 Boroughs mention domestic abuse in their housing allocation schemes, only 9 (28%) state they exempt domestic abuse victims from debt-related disqualification or deprioritisation.**

How could the Mayor and/or government improve the allocation of social housing in London?

This submission recommends to the London Assembly to:

- (1) Ensure that all London Borough housing allocation policies include the following clause to avoid acting unlawfully.

'[NAME OF LONDON BOROUGH] is committed to ensuring that victims of domestic abuse are not unfairly prejudiced under this allocations scheme. When applying [REFER TO RULES CONCERNING QUALIFICATION AND PRIORITY THAT RELATE TO DEBT], [NAME OF LONDON BOROUGH] will not have regard to any debts that have arisen in consequence of domestic abuse'.

- (2) Recommend to Government regulation change titled 'The Allocation of Housing (Qualification and Priority Criteria for Debts Related to Domestic Abuse) (England) Regulations'. Already drafted by a barrister for this purpose, these regulations require local authorities to disregard domestic abuse-related debts when deciding what classes of persons do and do not qualify for an allocation of housing, and when deciding what priority to award in respect of an allocation of housing. They provide that a local authority may not disqualify applicants for an allocation of housing on the basis of past or current debts, where such debts were accrued in connection with domestic abuse.
- (3) Improve London Borough data collection so that councils can know and monitor who is impacted by allocation policies they have put in place. This is a key starting point to ensuring equity.
- (4) Ensure that allocations are considered as part of actioning the London Domestic Abuse Safe Accommodation Strategy 2025-2028 and the 'whole housing approach' it aims to take. While access to services and accommodation are core concerns of the strategy, it does not mention housing allocations at all.

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30 October 2025

Endnotes

ⁱ <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-april-to-june-2025>

ⁱⁱ <https://www.londoncouncils.gov.uk/news-and-press-releases/2025/borough-homelessness-costs-soar-ps55-million-day#:~:text=New%20data%20published%20this%20week,a%20day%20in%202023%2D24.>

ⁱⁱⁱ <https://www.cih.org/media/ezugl10q/rethinking-allocations.pdf>

^{iv} This text has been written by Barrister Nick Bano at Garden Court Chambers and intended for use by local authorities to improve their allocation policies.

^v <https://sharedhealthfoundation.org.uk/publications/the-debt-trap-report/>

^{vi}

<https://static1.squarespace.com/static/6814e2be8e1cab13458e0fa9/t/686d71483b17335cc8fb3b75/1752002889155/Debt+trap+data+pack.pdf>

^{vii} <https://www.debt-trap-nation.org/book>

^{viii} <https://survivingeconomicabuse.org/news/coerced-debt-the-invisible-market-of-domestic-abuse/>

Call for evidence – allocations in social housing

Submission by the Royal Borough of Kensington and Chelsea on 30 October 2025

1. To what extent are social housing allocation policies equitable? Are they applied equitably in London?

Housing allocation policies are equitable in so far as they must comply with section 166A of the Housing Act 1996, Part 6. They must give reasonable preference to certain categories of people. They must also provide a right of review in relation to a decision made on a resident's eligibility to join the housing register; and a decision about the facts of their case which is likely to be, or has been, taken into account in considering whether to allocate housing to them. Further, housing allocation policies can be subject to judicial review, for example on the grounds of discrimination.

Therefore, where a resident does not believe that a decision made in relation to a housing allocation policy is fair, they can seek a review of this under section 166A(9)(c) of the Act; or they can challenge the lawfulness of a housing allocation policy by way of judicial review. The requirements of section 166A, including the rights of review, and judicial review challenges, should ensure that policies are equitable and applied fairly in practice.

The Council's Housing Allocation Scheme complies with these requirements – it provides reasonable preference to certain categories of people and a right of review to residents. We have provided further detail about our Housing Allocation Scheme and how we ensure it is equitable in our answers below.

Local authorities can decide on the priority given to the reasonable preference categories, award additional preference and local priorities to certain people, and set qualification criteria such as local connection requirements. Housing allocation policies may therefore vary to some extent. It is important, however, that local authorities have this flexibility and discretion when framing their housing allocation policies so they can respond to the housing challenges they face, manage their housing stock effectively and best meet local housing need.

2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

We do not believe that certain demographic groups are disadvantaged by our housing allocation policies.

We have detailed in the answer to question six how we ensure our Housing Allocation Scheme is equitable. This includes through equality impact assessments and assessing potential impacts on certain demographic groups, such as protected characteristic groups; and through meaningful resident and stakeholder engagement. This helps to ensure that certain demographic groups are not unduly disadvantaged by our Housing Allocation Scheme.

As we have detailed in the answer to question five, the demand for social housing in the borough far exceeds supply, which is the case across London. This means that it is not reasonably practicable to provide social housing to everyone who wants this – we cannot

place everyone in housing need on our Housing Register, or award the highest priority for rehousing to all qualifying residents. As such, some residents in housing need will be disadvantaged by housing allocation policies to a degree.

However, equality impact assessments and meaningful consultation with residents and stakeholders should ensure that certain demographic groups, such as residents with protected characteristics, are not unduly disadvantaged by housing allocation policies.

3. To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?

We have explained in the answer to question eight how our Housing Allocation Scheme helps us to make the best use of our housing stock, including by encouraging under-occupiers to downsize.

There is generally a significant lack of larger sized homes and accessible homes across London, and there is a need to free-up these types of homes within existing housing stock. Local authorities can frame their housing allocation policies to award local priorities and allocate a proportion of homes to under-occupiers and residents moving from accessible homes they do not need, so these homes become available for other households.

Best practice examples could be shared with local authorities. For example, where local authorities have framed their policies to award priority and allocate a proportion of available homes to residents moving from larger and accessible homes; how policies have helped other residents to move into these types of homes, such as overcrowded households, temporary accommodation households, and residents with complex medical needs; and how a chain letting (or vacancy chain) approach has helped to make the best use of housing stock.

In addition, best practice examples could be shared of how local authorities have worked operationally to make the best use of their housing stock and free up in-demand homes. For example, where dedicated officers and teams have been established to achieve this, how they have worked with residents in practice to make this successful, and how they have incentivised residents to move.

In our experience, this work can be intensive, involve working with residents over prolonged periods of time to achieve positive outcomes, and requires a financial commitment to pay for incentives and fund targeted campaigns to promote these schemes and housing options. Local authorities will therefore need sufficient resources if they are to dedicate officers and teams to improve mobility within housing stock.

4. How could the Mayor and/or government improve the allocation of social housing in London?

Delivering genuinely affordable homes – including homes based on social rent levels for people on low incomes – and providing sufficient funding to local authorities to deliver new homes where they reasonably can, would help to improve the supply of social housing in London. This includes accessible homes that meet the needs of older residents and those with disabilities. An increase in the supply of these homes will positively impact on the allocation of social housing in London.

In addition, delivering more intermediate rent homes for those on average incomes, and affordable home ownership for those who cannot buy on the open market, would help to reduce the demand for social housing to an extent.

The Mayor of London could ensure that the rehousing schemes it oversees, including pan-London schemes – such as the Housing Moves scheme and Seaside and Country Homes scheme – operate as effectively as possible.

Support could be provided to local authorities in terms of how technology and data can best be used to digitalise housing processes, and deliver improved housing assessment and allocation processes. This could also include how technology and data can be used to improve the accessibility of housing allocation information for residents and the public.

Research could be shared with local authorities about the systemic barriers that certain demographics face in relation to the allocation of social housing. This could include best practice in terms of how local authorities can assess the potential impact of their housing allocation policies on different demographics. Local authorities could consider this when reviewing their housing allocation policies and designing housing services.

5. What are the main challenges allocating social housing in your borough?

There is a significant lack of social housing in the borough comparative to the demand for this. We have circa 2,900 households on our Housing Register and we let about 400 social homes each year, meaning that only approximately 14% of the Housing Register is rehoused each year.

Residents therefore face long wait times to be rehoused to social housing. It takes on average five years and five months to be rehoused to social housing in the borough. However, approximately two-thirds of our Housing Register is households in temporary accommodation, who wait seven and a half years on average to be rehoused. These wait times increase significantly for larger and accessible homes.

This means that households spend significant periods in temporary accommodation, which is not beneficial for them and has cost implications for the Council – particularly as the amount that local authorities can claim back in temporary accommodation subsidy is currently capped at 90% of the Local Housing Allowance rates from 2011, and many landlords have exited the rental market in recent years which has affected temporary accommodation supply.

There is a significant lack of family sized homes that become available each year. For example, in 2024/25 42% of households on the Housing Register needed a two-bedroom home, but only 29% of all allocations were two-bedroom homes. Further, 28% of the Housing Register needed a three or four-bedroom home, but only 15% of all allocations were three or four-bedroom homes. In addition, no five-bedroom homes became available.

It is possible that local authorities will see a reduction in the number of homes made available by housing associations to let through their housing registers. Social housing providers may keep more of their homes to rehouse their own tenants living with poor housing conditions to ensure that they comply with Awaab's Law. This may place even greater pressure on the allocation of social housing for local authorities.

Given the demand on the Housing Register from households in temporary accommodation and the lack of social housing that becomes available each year, we have looked to promote the private rented sector as an alternative to temporary accommodation. We work proactively to help residents find suitable private rented homes, and we can provide financial assistance and support to households. We have also introduced a relatively high priority on the Housing Register for qualifying households who choose the private rented sector instead of temporary accommodation.

It can be challenging, however, to help households move to the private rented sector instead of temporary accommodation. Many residents cannot afford private rented housing or do not wish to live in the private rented sector. This places greater pressure on the allocation of social housing. It is therefore important that local authorities are adequately funded to properly implement and enforce the Renters' Rights Act, and ensure that the private rented sector is an attractive option for residents.

6. How does your borough ensure that your allocation policies are equitable?

We complete an equality impact assessment when developing a new Housing Allocation Scheme and undertaking a review of this. This considers the potential impact of the policy on certain demographic groups, including the different protected characteristic groups. It also identifies any action that is needed to mitigate against potential adverse impacts and ensure the policy is equitable.

In addition, when developing our current Housing Allocation Scheme, we undertook substantial consultation with residents, stakeholders and staff. We commissioned NewmanFrancis, a community engagement organisation, to conduct early resident engagement in the borough. Residents and community groups were asked about key themes within the policy, and provided their views on a wide range of issues. A resident group was established to work with NewmanFrancis on this.

We subsequently carried out our own consultation on the Housing Allocation Scheme over a 12-week period. This included a survey open to the public, and a series of focus groups and interviews with residents and key stakeholders. Following the development of the draft Housing Allocation Scheme, we conducted a second public consultation on the draft policy, which included a survey, focus groups with residents and stakeholders, and other resident and stakeholder meetings.

This resident and stakeholder engagement helped to shape the final Housing Allocation Scheme, ensuring it is equitable and enables us to best meet the challenges we face and respond to local housing need.

7. How does your borough hear from residents to improve the allocation process?

We have outlined under question six how we heard from residents and stakeholders when developing our Housing Allocation Scheme, which helped to improve the allocation process.

In addition to this, we regularly meet with resident groups and stakeholders to discuss key housing issues, including the allocation of social housing. This ensures that we continue to

hear the views of residents and stakeholders about how well this policy is working in practice and to identify whether any changes to it are needed.

Where we are proposing a significant change to the Housing Allocation Scheme, we would look to undertake formal consultation with residents on this.

8. Do you have any policies that encourage inter-tenure mobility and address under-occupancy? [If so, how effective are these policies at freeing up more social housing]?

Residents wishing to move from under-occupied social housing or an accessible home they do not need are awarded the highest priority within band two under our Housing Allocation Scheme. The points awarded to under-occupiers increase with the number of bedrooms they will hand back when they move.

In addition, we award a high priority within band two to adult family members who wish to split from the main household when they downsize to a new home, providing the total number of bedrooms in the new homes is less than the number of bedrooms in the home they move out from. We can also agree to rehouse split members of a household moving from an accessible home, providing the total number of bedrooms in the new homes is equal to or less than the number of bedrooms in the home they move out from.

Further, we award additional priority (on top of the band two priority) to residents who have succeeded to a tenancy for a home that is too big for their needs, or an accessible home they do not need, to help free-up these homes for others.

We offer financial incentives and support to encourage under-occupiers and households in accessible homes to move to alternative social housing. We currently have a small housing mobility team comprising officers who work with these households to help them move. This approach has proved successful in increasing the supply of family sized homes and accessible homes. The team has helped 82 households to move from under-occupied or accessible homes since December 2023, resulting in a net bedroom gain of 103 and projected temporary accommodation savings of £409,544.13.

We look to use a chain letting (or vacancy chains) approach where possible to make the best use of our housing stock. This provision is included within our Housing Allocation Scheme. Where social housing becomes available, we may look to target the available home to households who will free-up another home for someone else waiting to be rehoused, rather than advertising it to everyone on the Housing Register.

Our annual lettings quotas are a percentage of available homes that we aim to let to different types of housing need each year. In 2025/26 we are aiming to let 10% of homes to under-occupiers and households moving from accessible homes to promote mobility within our housing stock. We met this target last year.

Our Housing Allocation Scheme promotes inter-tenure mobility in other ways, aside from freeing-up larger and accessible homes. For example, priority is awarded to households who need to move from social housing because of a risk to their safety, due to their medical needs, to enable them to adopt or foster, and because they are overcrowded.

9. How do your allocation policies reflect the Mayor's Housing Strategy?

Our Housing Allocation Scheme reflects the Mayor's commitment to protect London's existing social housing by supporting a more efficient use of this and helping tenants who want to move to more appropriate homes. Our policy helps us to make the best use of our social housing stock, including by supporting residents to move from larger and accessible homes; and helping residents to move to more suitable homes generally, including on the grounds of overcrowding, medical needs and risk to safety.

The Housing Strategy prioritises high quality homes and inclusive neighbourhoods, and has a commitment to meet London's diverse housing needs, including through the accessibility of homes. Our Housing Allocation Scheme awards high rehousing priority to residents who need to move to alternative housing on medical grounds, such as households who need an accessible home. We also award high rehousing priority to households moving from accessible homes they do not need so these homes can be made available to others.

In 2025/26 we are aiming to let 8% of available homes to people who need to move on health grounds and 10% of homes to under-occupiers and those moving from accessible homes – and we met these targets in 2024/25. In addition, households who need to move due to the most serious medical reasons (who fall within band one) are allocated a proportion of available homes each year.

The Mayor has a priority to tackle homelessness and help rough sleepers, including by preventing homelessness and helping homeless Londoners into housing. Our policy reflects this by awarding a relatively high rehousing priority to qualifying residents who choose the private rented sector instead of moving to or staying in temporary accommodation, so they can continue to bid for social housing on moving to a private rented home. This includes residents who are at risk of becoming homeless.

We award a relatively high rehousing priority to households in temporary accommodation and we currently aim to let 60% of available social housing to these households. Further, the local connection criteria within the Housing Allocation Scheme (three-years' continuous residence in the borough) is waived for households in temporary accommodation under the section 193(2) main housing duty. This ensures that a significant number of households in temporary accommodation are offered permanent social housing each year.

Our policy awards a very high band one rehousing priority to qualifying victims of domestic abuse who need to move to alternative housing for their safety. This is an effective homelessness prevention measure, especially as domestic abuse is one of the main causes of homelessness in the borough.

We also help former homeless residents and rough sleepers to access social housing. Where people are ready to move on from support or care, and they have certain vulnerabilities and support needs, they can qualify for a relatively high rehousing priority through the policy. This also applies to other vulnerable residents, including care leavers. We are aiming to let 13% of available homes to this type of housing need in 2025/26 and we met this target last year.

10. To what extent have you engaged with the Mayor's Housing Moves scheme and Seaside and Country Homes Scheme? How could these programmes be improved?

With regards to the Seaside and Country Homes scheme, we have helped six households to move through this in recent years. There are currently 15 live applications for our residents and 20 applications have either been suspended or cancelled. We are periodically in contact with Seaside and County Homes, and they accepted an invitation to present to us in August 2024 which was helpful.

In terms of how the scheme could be improved, there could be more detail about the processes, more specific information about waiting times, and a summary of the type of households the scheme best benefits. In addition, residents who are accepted onto the scheme may not receive any subsequent contact from the scheme about their rehousing. It would be beneficial if the scheme updated such residents periodically (such as every six months) on their potential rehousing, and to confirm whether they want to remain on the scheme.

Further, there is minimal information on the admin site about residents who have moved through the scheme. It would be useful to see where residents have moved to, especially as they may have been entitled to incentives.

With regards to the Housing Moves scheme, we intend to make better use of this scheme in the future to assist residents in housing need.

11. How could the GLA and/or government better support local authorities with social housing allocation in London?

Please see the answer to question four.

Housing Needs, Housing and Social Investment
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London Assembly: Call for Evidence: Allocations in social housing
October 2025

Questions	Response
1. To what extent are social housing allocation policies equitable? Are they applied equitably in London?	We can only comment on our own Allocations Scheme. Every local authority's Allocation Scheme will differ slightly depending on their borough's priorities and how they want to meet housing need. In Tower Hamlets, we hold a Common Housing Register with our Registered Provider (RP) partners. Our Allocations Scheme is (in London) a unique partnership with RPs who operate in our borough which ensures that we and our RP partners are maximising the availability of social housing in the borough - to ensure social housing stock is distributed equitably.
2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?	Our policy does not target or favour a particular demographic. Our Allocations Scheme ensures our limited supply of social housing in Tower Hamlets is allocated on a housing needs basis. It is relative to the needs of our communities. Our social housing lettings reflect the demographics of the general population of the borough.
3. To what extent do current allocation policies in London maximise the best use of housing stock [e.g. through encouraging downsizing]? How could this be improved to free up more homes?	Current housing allocation policies in London aim to make better use of existing social housing stock, including encouraging downsizing, but there are significant limitations in their effectiveness. Most local authorities in London have downsizing incentives in place, but local authorities have limited budgets and competing housing priorities which reduces their capacity to fund generous downsizing schemes. In Tower Hamlets, our Allocations Scheme specifically includes "Under occupiers or downsizing" as a priority group within Band 1 Group A, which is the highest priority band, and we do offer financial incentives for those looking to downsize or who are under-occupying an existing council tenancy. There is also a shortage of suitable, affordable and accessible smaller homes and in the provision of purpose-built housing for older people limiting attractive alternatives for those who are interested in downsizing. Newer built properties often incur higher rental and service charge costs than the larger property an older person may be currently occupying, which can dissuade social housing tenants from moving out. In addition, for residents there are also both social and personal barriers which impact on downsizing such as a persons' emotional attachment to their home and community. Moving can also be stressful and complicated for older or vulnerable people.

London Assembly: Call for Evidence: Allocations in social housing
October 2025

	Local authorities with dedicated staff and support services see better outcomes. Local authorities' budgets and resources are stretched; there is more to it than just having financial resources to incentivise under-occupiers to move on. It is about having the staff to invest in time and support to enable vulnerable or older persons to move on and downsize which is needed. This could be improved by ensuring that local authorities are sufficiently funded to provide the dedicated resources to facilitate downsizing. In addition, more funding is needed to enable local authorities to deliver more purpose-built, accessible homes for older or vulnerable people in London. More funding would allow local authorities and RPs greater investment to retrofit their existing supply of smaller homes to improve accessibility and energy efficiency – considerations for those looking to downsize. The GLA could lead on the development of a London-wide downsizing strategy, to ensure consistency across all the London boroughs and to align incentives, eligibility criteria, and support services.
4. How could the Mayor and/or government improve the allocation of social housing in London?	To improve the allocation of social housing, the Mayor of London and the government could: • Increase government funding to support local authorities to tackling both overcrowding and under-occupation, enabling more effective housing management. • Mandate higher housing developer contributions, requiring more affordable homes, especially wheelchair-accessible and autism-friendly properties with enhanced safety features, to be allocated to local authorities. • Provide funding to enable local authorities and RPs the opportunity to standardise and enhance downsizing support, ensuring all social landlords offer the same financial incentives. Additional funding will enable local authorities to provide practical assistance with moving, including packing, removals, decoration, and utility reconnections.

London Assembly: Call for Evidence: Allocations in social housing
October 2025

5. What are the main challenges allocating social housing in your borough?	The main challenges in allocating social housing in Tower Hamlets are: • High Demand vs. Limited Supply: With circa 30,000 households on the Common Housing Register, 90 new applications received per week and only a small number of homes available each year despite a healthy build programme, demand far exceeds supply - especially for larger family-sized properties. • Population growth: Tower Hamlets has the fastest population growth and the highest population density across England and Wales between 2011 and 2021. The borough also has one of the youngest populations in the UK and the most transient populations in London. • Overcrowding: Many families live in overcrowded conditions, 44% of applicants on our Common Housing Register. That is 12,797 households who are overcrowded, out of which 2,595 households lack two bedrooms or more. • Unhoused residents: 3,120 households do not have a home and live in temporary accommodation • Shortage of Suitable Homes: There is a lack of accessible, larger and family sized homes. • Affordability Pressures: Rising rents and property prices combined with the cost-of-living crisis make even “affordable” housing inaccessible for many, increasing pressure on social housing. • Development Constraints: Limited land and high construction costs restrict the delivery of new homes. We are a borough with a growing population and a lack of space to build.
6. How does your borough ensure that your allocation policies are equitable?	We ensure equity in our allocation policies through regular consultation with stakeholders and residents before making any changes, and by conducting Equality Impact Assessments (EIAs) to understand the potential impact of any changes on different groups. All properties from our Common Housing Register (CHR) partnership are advertised through a single, transparent channel, our Homeseekers Website: https://www.thhs.org.uk/, where allocations and offer outcomes are publicly visible. Initiatives like Project 120¹ and our work with autistic families further demonstrate our commitment to inclusive and transparent practices.

¹ Project 120 ensures new housing in Tower Hamlets includes affordable, wheelchair-accessible homes for disabled residents, especially those in overcrowded or unsuitable housing. The project works closely with housing teams, occupational therapists and developers to design homes with features like lifts and hoists, to improve residents' independence and quality of life.

London Assembly: Call for Evidence: Allocations in social housing
October 2025

	We also give additional priority or allocate a quota of available social housing lets to groups such as Care Leavers, Foster Carers, Key Workers and Ex-Service Personnel, the Sons and Daughters of Tenants of Common Housing Register (CHR) partner RPs, Residents in Decant Blocks, HOST Team Referrals (Supported Housing Move-On), and Applicants fearing violence or with urgent social needs. These groups may be considered for discretionary additional priority or direct offers, depending on their circumstances. Our Housing Management Panel oversees exceptional cases not covered by the Allocation Scheme, such as appeals and succession, ensuring decisions are fair and consistent.
7. How does your borough hear from residents to improve the allocation process?	We gather resident feedback through multiple channels, including complaints, Member Enquiries (MEs), Common Housing Register (CHR) Partner Meetings, Tower Hamlets Housing Forum (THHF) sessions with our RP partners, formal consultations, and direct feedback to Housing Officers. This helps us identify issues and continuously improve our allocation processes.
8. Do you have any policies that encourage inter-tenure mobility and address under-occupancy? [If so, how effective are these policies at freeing up more social housing]?	Yes, our borough has several policies in place. The ‘Sons and Daughters’ Scheme gives the highest priority to adult children in severely overcrowded households, which, although limited in numbers, this has helped release much-needed family-sized homes. We also support under-occupiers by placing them in the highest priority band within our allocation policy and assigning dedicated officers to assist with the downsizing process. To further support inter-tenure mobility, we use auto-bidding to help residents find suitable homes more efficiently. However, the effectiveness of these policies is difficult to measure. Monitoring long-term outcomes, such as how many larger homes are freed up and re-let, or the sustainability of moves, can be administratively complex and resource intensive.
9. How do your allocation policies reflect the Mayor’s Housing Strategy?	Tower Hamlets’ Allocations Scheme closely aligns with the Mayor of London’s Housing Strategy through its focus on fairness, prioritising those in greatest need, and supporting vulnerable groups. The borough gives the highest priority to under-occupiers and severely overcrowded households and operates schemes like the Sons and Daughters Scheme and Housing First, which helps to free up larger homes and support those at risk of homelessness - key priorities in the Mayor of London’s strategy.
10. To what extent have you engaged with the Mayor’s Housing Moves scheme and Seaside	We have engaged with both schemes, but uptake from residents has been limited. The Housing Moves scheme has become more restrictive, now limited to domestic abuse survivors and former rough sleepers, which

London Assembly: Call for Evidence: Allocations in social housing
October 2025

and Country Homes Scheme? How could these programmes be improved?	reduces its usefulness for the wider resident population. We believe it should return to its original, more inclusive model, allowing broader access. Additionally, the scheme would benefit from greater publicity and a higher profile to increase awareness and participation. We also see a need for stronger buy-in from other local authorities to support reciprocal moves, which could be better coordinated by the GLA. In addition, the GLA should lobby the government to remove the bedroom tax for tenants moving into two-bedroom homes under these schemes, especially younger residents seeking to relocate. The Seaside and Country Homes scheme, while desirable to some, is often not financially sustainable due to affordability issues. Many tenants are reluctant to move far from family, and the lack of one-bedroom properties under this scheme further limits options and choice. While our Housing Mobility Team encourages residents to consider of two-bedroom homes, this can lead to rent affordability issues and potential arrears particularly where residents in receipt of benefits are liable for the bedroom tax.
11. How could the GLA and/or government better support local authorities with social housing allocation in London?	To better support local authorities with social housing allocation in London, the GLA and the government could: 1. Expand Housing Supply and Access a. Increase funding to build more genuinely affordable and accessible homes, including larger family units and to allow local authorities and RPs to increase their provision of supported housing (including sheltered and extra care). b. Empower local authorities to purchase unsold or vacant homes on new developments for social housing use. c. Facilitate collaborative working between boroughs, allowing local authorities to take on hard-to-let properties from other local authorities. d. Clamp down on short-term lets (e.g. Airbnb) and explore funding local authorities to acquire developers (who have folded) unfinished properties to increase available stock. 2. Enhance Housing Mobility and Downsizing a. The GLA should restore broader eligibility for Housing Moves and increase public awareness of these schemes.

London Assembly: Call for Evidence: Allocations in social housing
October 2025

	b. Both government and the GLA should encourage reciprocal arrangements between boroughs. This could be coordinated by the GLA. c. The government should provide additional funding for downsizing, which would enable local authorities to provide support with rent arrears where tenants agree to move, and practical help with removals, decorations, and utility reconnections. d. The government should consider waiving the bedroom tax for tenants moving into slightly larger homes (e.g. two-bedroom) to support mobility or to enable the tenant to down-size from larger family homes. 3. Improve Data and Fraud Prevention a. The government need to fund local authorities to develop better data-sharing systems between local authorities to detect duplicate social housing applications and prevent fraud. b. Provide targeted funding to tackle illegal subletting and false declarations on housing applications. 4. National and Regional Policy a. The GLA should recognise that the London region is overcrowded, b. The government and the GLA should explore if moving to sub-regional Allocation policies would be more beneficial in strategically addressing overcrowding, under occupancy, Equality and Diversity Impacts and poverty. c. The GLA should convene focus groups and behavioural insight studies across London with residents on housing registers (split between inner and outer London and sub-regionally) to fully explore these issues and gain insight and understanding. d. Address gaps in current schemes, such as the Seaside and Country Homes programme, by improving affordability and offering more suitable one-bedroom options closer to family networks.
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London Assembly Housing Committee Call for Evidence – LB Waltham Forest response

Introduction: The London Assembly Housing Committee is investigating how social housing is allocated in the capital.

Objectives:

- To understand the variation of social housing allocation policies across local authorities in London, including the extent to which policies are applied equitably and make the best use of available housing.
- To assess how effective the Mayor's London Housing Strategy has been in shaping social housing allocation policies across councils.
- To scrutinise the effectiveness of the Mayor's Housing Moves scheme and the Seaside and Country Homes programme.
- To identify what role the Mayor could play going forward to improve the allocation of social housing in London

Key issues: The London Assembly Housing Committee is investigating how social housing is allocated in the capital.

1. To what extent are social housing allocations policies equitable? Are they applied equitably in London?

Waltham Forest's Housing Allocation Scheme is designed to be equitable by prioritising applicants based on need, using a fair and transparent banding system (Bands 1–5). The scheme complies with statutory requirements and national guidance, including the Housing Act 1996, the Localism Act 2011, and the Equality Act 2010. It also aligns with the Mayor's Housing Strategy and the borough's own housing and homelessness strategies.

The policy includes safeguards to ensure fairness, such as:

- A clear eligibility framework, including local connection criteria with exceptions for vulnerable groups.
- Discretionary powers for exceptional cases.
- Regular reviews and re-registration requirements to ensure up-to-date assessments.

However, equity is challenged by the chronic undersupply of social housing across London, which limits the ability to meet all needs.

2. How are certain demographic groups disadvantaged by allocation policies and what does this look like in practice?

We do not consider any demographic groups to be particularly disadvantaged by allocation policies, but the shortage of social housing means we must prioritise and

this impacts different groups in different ways:

- Larger families wait longer due to a shortage of suitably sized homes.
- Those with lower levels of need have little to no access to social housing.
- The cost of providing temporary accommodation means that a high proportion of social housing is allocated to homeless households.
- People with disabilities may face delays due to limited accessible housing stock.
- Migrants and those with no recourse to public funds are excluded due to statutory ineligibility rules.
- Local connection criteria limits access to housing to those who do not currently live in the area.

3. To what extent do current allocation policies in London maximise the best use of housing stock? How could this be improved to free up more homes?

The London Borough of Waltham Forest actively promotes better use of housing stock through:

- Incentive schemes for under-occupiers, encouraging downsizing.
- Direct offers and restricted bidding to target lettings to high priority groups, such as homeless households living in temporary accommodation.
- Participation in mobility schemes to facilitate moves across boroughs.

Improvements could include:

- Development of pan-London mobility schemes to enable existing social tenants to move between boroughs.
- Greater investment in downsizing support.
- Enhanced data sharing across boroughs.
- Increased delivery of family-sized and accessible homes.

4. How could the Mayor and/or government improve the allocation of social housing in London?

The main issue affecting the allocation of social housing is the extremely low level of housing available relative to demand. The number of people who want or need social housing far exceeds the amount of housing available.

Key recommendations include:

- Increased funding for new social housing, especially larger and accessible homes.
- Expansion of pan-London mobility schemes with better incentives and support.
- Digital infrastructure investment to streamline applications and improve transparency.

Continued emphasis on homelessness prevention and development of alternative housing options such as private rented to better manage demand for social housing.

The London Borough of Waltham Forest supports local flexibility and improvements in delivery and governance at a Mayoral level in response to housing needs for the allocation of housing to our residents.

Ultimately, the key driver to improving the allocation of social housing in London is to continue with the government's mission to deliver 1.5 million homes across the next Parliament. The Council's duty to refer homeless residents with children or vulnerabilities into accommodation has placed acute stress on the housing register and impairs the ability to support a broad range of residents. Focusing on housing delivery and working to lobby central government to secure more funding given the financial pressures will be the key focus in improving the allocations process and being able to equitably help Waltham Forest residents into social housing.

5. What are the main challenges allocating social housing in your borough?

The main challenges allocating social housing in the London Borough of Waltham Forest are as follows:

- Severe supply-demand imbalance.
- Managing expectations regarding the lack of availability of social housing
- Complex needs among applicants.
- Affordability pressures due to homelessness duties.

6. How does your Borough ensure that your allocation policies are equitable?

The London Borough of Waltham Forest ensures that our allocation policies are equitable by undertaking regular policy reviews and updates as part of our Housing Services Policy Review Programme. Equality Impact Assessments are also an important part of making sure that resident needs are fully considered during the development and consultation phase of our policies.

The current Waltham Forest Allocations policy has a transparent banding system and appeals process. We also use discretionary panels for exceptional cases.

7. How does your borough hear from residents to improve the allocation process?

The London Borough of Waltham Forest always prioritises resident engagement during a policy review and development process. There are resident engagement forums and surveys for feedback mechanisms and opportunities, as well as through the housing register and complaints process.

8. Do you have any policies that encourage inter-tenure mobility and address under-occupancy?

The London Borough of Waltham Forest have policies that encourage inter-tenure mobility and address under-occupancy to:

- Offers incentives for under-occupiers to downsize.
- Participates in mutual exchange schemes.
- Supports inter-tenure mobility through schemes like Housing Moves and Homefinder UK.

These have had moderate success, but uptake is limited by the availability of suitable alternative homes and the need for tailored support.

9. How do your allocation policies reflect the Mayor's Housing Strategy?

The Waltham Forest Housing Allocations policy aligns with the Mayor's priorities by prioritising those in greatest need and supporting mobility across boroughs.