

MHCLG Call for Evidence: Social Housing Allocations to help reduce Homelessness

G15 Residents' Group Response

Lead member: Charlaine Nkum

Contact email: enquiries@G15Residents.co.uk

Date: September 2026

Response informed by:

- Discussions held through the G15 Residents' Group forum including personal accounts and experiences shared by members.
- [The G15 Residents' Group responds to the London Assembly's Call for Evidence on Social Housing Allocations - G15](#)
- [G15 Residents Group responds to London Assembly's investigation into the Mayor's Affordable Housing Delivery - G15](#)
- The lived experience of G15 Residents' Group members, representing all tenure types and a diverse range of backgrounds from across London's housing association sector.
- Direct experience of homelessness, temporary accommodation, hostels, overcrowding, housing need, mutual exchange and social housing allocations.
- Engagement with housing associations, sector bodies and national policy discussions relating to housing supply, homelessness prevention and resident-led reform.

Introduction

The G15 Residents' Group (G15RG) welcomes the opportunity to contribute to the MHCLG's early exploration for evidence on social housing allocations and homelessness prevention.

The G15 Residents' Group is an independent, resident-led strategic forum comprising residents involved in the governance and resident engagement activities of their G15 landlords. Collectively, G15 members own and manage around 880,000 homes across England, including homes for one in ten Londoners.

Our members bring diverse perspectives and direct experience of the housing system as applicants, tenants, mutual exchange users, disabled residents, people who have experienced homelessness, and families living in overcrowded homes. This response draws on those experiences, alongside practical insight gained through engagement with housing associations, government and sector partners. It also builds on previous G15RG submissions relating to affordable housing delivery, homelessness prevention, housing mobility and social housing allocations.

The current allocations system is complex, inconsistent and emotionally demanding. However, allocations cannot be viewed in isolation. From a resident perspective, homelessness is rarely the result of a single policy failure. It is often the cumulative effect of a shortage of social rented homes,

affordability pressures, overcrowding, barriers within allocations systems, limited housing mobility and insufficient support at times of crisis. These issues do not exist in isolation. They interact and compound one another, creating housing insecurity for individuals and families.

A balanced approach is required, recognising both the need to build more social rented homes and the importance of investing in existing homes. Alongside this, housing associations require long-term financial stability and certainty if they are to continue playing a significant role in tackling homelessness, maintaining existing homes and delivering the new social rented homes the country urgently needs. London faces particular challenges that require additional consideration, including exceptionally high housing costs, increasing development costs and the growing financial pressures associated with maintaining and improving existing homes.

Residents are uniquely placed to help identify where the system is failing and how it can be improved. Through our lived experience, we see the connections between allocations, housing supply, affordability, housing quality, mobility and homelessness prevention. For many residents, allocations policy is not an administrative process. It determines whether children grow up in overcrowded homes, whether disabled people can live independently, whether families can maintain vital support networks, and whether people experiencing homelessness can rebuild their lives.

Behind every application is a person. One G15RG member described spending almost a decade trying to help their homeless mother secure suitable accommodation despite significant medical needs:

“We tried to get her on the council list for a number of years. The process was lengthy, with numerous appeals. We had to apply the Equality Act to get her banding lifted. That whole process took maybe 10 years before we reached the point where she was housed.”

Another member spent four years living between a hostel and temporary accommodation with a young family:

“The impact on my mental health during those four years was just incredible. It was so demoralising raising your baby, living, eating and sleeping in a single room for years. The process of being on the housing list is so impersonal. You are just a number.”

Whilst individual experiences differ, the themes are remarkably consistent. Residents describe a system that is fragmented, difficult to navigate, inconsistently applied between boroughs and often unable to respond to changing circumstances throughout a person's life.

One member reflected on the wider impact of losing social housing in London:

“There are social homes in London that are placed in the ‘too difficult’ pile because they are complex and expensive to retrofit, and they are then sold. The argument is that the

money from the sale could be used to build more social homes outside the capital, but that does not help the housing crisis in the city."

Allocations reform alone will not solve homelessness. Increasing the supply of social rented homes, protecting existing homes, supporting housing mobility, maintaining affordability and preventing homelessness before it occurs must all form part of a joined-up strategy.

The G15RG has consistently argued, including through its Treasury submissions, that ending homelessness requires a long-term, fully funded and coordinated national housing strategy. This should include sustained investment in new social rented homes, funding to maintain and improve existing homes, support for retrofit and decarbonisation, measures to keep rents affordable, and stronger homelessness prevention services. Residents must be integral to these discussions, helping to shape practical solutions and ensure policies reflect real-world experience. Without this investment and partnership, allocations systems will continue to manage scarcity rather than meet housing need.

Our recommendations reflect both resident experience and an understanding of the wider housing system. We seek to identify solutions that improve allocations, support housing mobility, reduce barriers within the system, make better use of existing homes and help unlock new supply. By working together across government, local authorities, housing associations and residents, we believe it is possible to create a fairer, more transparent and better-resourced system that supports the long-term ambition not simply to manage homelessness, but to reduce and ultimately end it.

Key Issues Identified

1. Inconsistency Across Boroughs: A Postcode Lottery for Housing Need

Residents consistently describe a system where access to social housing depends not only on housing need, but also on where an applicant happens to live. Different boroughs apply different eligibility criteria, banding systems, local connection requirements, medical assessments and priority rules. This creates confusion and perceptions of unfairness.

For residents, housing need does not change at a borough boundary, yet the likelihood of receiving support often does. Several members reported spending years on waiting lists only to find that policy changes altered their eligibility or priority.

One member described their experience simply:

"They changed the criteria and literally threw me off the waiting list."

The result is a system that many residents perceive as arbitrary and inconsistent. Those in greatest housing need should have confidence that they will be assessed fairly regardless of where in London they live.

2. Lack of Transparency and Communication: A System People Do Not Understand

Residents repeatedly told us that one of the most frustrating aspects of the allocations process is not knowing how decisions are made.

Applicants often do not understand how points are calculated, how priority bands operate, why their application has not progressed, or how changes in policy affect them. This lack of transparency leaves many feeling powerless.

One member recalled:

"You are just a number, allocated points. I had to call every day to find out if I had moved because your position could go up or down. Other people were entering the waiting list above me, while I was just stagnant waiting for years for a home."

Another member described the challenges faced by applicants whose first language is not English:

"They bamboozle you the whole time, so you are confused and do not know what your rights are. And with English not my first language, there is no way you are going to understand that jargon. You are immediately alienated."

Residents recognise that housing need and statutory duties change over time. However, when changes are not clearly explained, trust in the system is undermined. Better communication would not increase housing supply, but it would reduce anxiety, improve understanding and help applicants make informed decisions.

3. Impersonal and Rigid Systems: People Reduced to Processes

Residents frequently described an allocations system that feels administrative rather than human.

While councils and housing associations must manage significant demand with limited resources, residents often feel that policies fail to reflect the complexity of individual circumstances. Temporary accommodation, bidding systems and housing offers can feel inflexible and detached from people's lives.

One resident who experienced homelessness described the impact:

"The impact on my mental health during those four years was just incredible. It was so demoralising. The process of being on the housing list is so impersonal."

Another member recalled the uncertainty of receiving an offer:

"You would get a letter and you had literally three days to move, and that was it. There was no chance of refusing it."

Another member highlighted how bureaucratic processes and poor coordination between organisations can leave disabled residents trapped in unsuitable homes, even when there is agreement that adaptations are needed:

"My housing association approved adaptations to make my home suitable for my disability but said I needed a council occupational therapist. The council would not provide one because they said the adaptations had already been approved by my landlord. For months they were at a standstill and I was left living in my home that I couldn't get around."

This experience demonstrates how fragmented processes can delay essential support, even where there is agreement on what is needed. Residents should not be caught between different organisations, particularly where their health, independence and quality of life are affected. Better coordination between councils, housing associations and health services is essential to ensure adaptations and housing-related support are delivered promptly and without unnecessary barriers.

For disabled residents, older residents and those with caring responsibilities, the consequences can be particularly severe. Housing is not simply a transaction. It affects health, independence, employment, family life and wellbeing. Allocations processes should therefore be designed around people, not only procedures.

4. Void Properties and Bureaucratic Delays: Homes Standing Empty While Families Wait

Residents find it difficult to understand how homes can remain empty when homelessness and housing need continue to grow.

Members shared examples of newly refurbished or newly built homes remaining vacant for extended periods due to administrative delays, disagreements over nominations, or poor communication between organisations.

These delays have a real human impact. Every week that a home remains empty is another week that a family remains in temporary accommodation, another week that an overcrowded household waits for relief, or another week that someone experiencing homelessness remains without a permanent home.

One member recalled:

"When I was homeless, I used to walk the streets pushing my daughter in a pram, looking at all the properties empty for months and wishing I could live in one of them."

Residents recognise that homes must be safe and properly prepared before they are let. However, they believe greater coordination between housing associations and local authorities could significantly reduce avoidable delays and make better use of scarce social housing.

5. Cross-Boundary Challenges: Housing Need Does Not Stop at Borough Borders

Housing associations increasingly operate across multiple boroughs and local authority areas, yet allocations systems often remain highly localised.

Residents told us they often feel trapped by local connection rules and administrative boundaries that do not reflect how people actually live. People work across boroughs, rely on family support networks beyond borough boundaries and access healthcare, education and employment opportunities across London.

One member highlighted the consequences:

"I was offered a flat in Kent. I had no connection there and my job was in London. What was I supposed to do?"

Another explained why remaining close to family networks mattered:

"My network was key to me being able to survive. I had to remain in near my family and friends so I could maintain those connections and stay close to what I knew."

A more joined-up approach would allow housing providers and councils to make better use of available homes while ensuring residents can remain connected to the communities and support networks that sustain them.

6. Limited Resident Involvement: Policy Made Without Those Most Affected

Residents are the people who experience the allocations system first-hand, yet they are rarely involved in shaping the policies that govern it.

The experiences shared through this submission demonstrate the depth of insight residents can bring. They understand where systems work well, where barriers exist and how policies affect everyday lives.

Too often, residents are consulted only after decisions have been made rather than being involved in the design of solutions from the outset.

As this response demonstrates, residents bring expertise not only as applicants but as parents, carers, disabled residents, older people, people who have experienced homelessness and people who have successfully navigated the system.

Allocations policies are more likely to be effective, trusted and fair when they are informed by those with direct experience of using them.

7. Housing Mobility, Mutual Exchange and Homeswapping Systems: Not Fit for Purpose

Much of the national debate focuses on allocating homes to new applicants. However, insufficient attention is given to helping existing social housing residents move when their circumstances change.

Residents believe there should be a distinction between a "home for life" and the security of a "tenancy for life". People should have confidence that they will always have an affordable, secure home, whilst retaining the flexibility to move when their needs change.

Over a lifetime, households change significantly. Families grow, children leave home, residents develop health conditions, become disabled, take up employment elsewhere or require support from family carers. Yet the current system often traps people in homes that no longer meet their needs.

One disabled member described the impact of living in unsuitable accommodation:

"Living in an unsuitable property is like living in a prison. If your home becomes unsuitable because your needs have changed, the council will not deem you to be in need of a home because you are not homeless. I just sat there trapped until I was transferred to a disabled adapted home by my housing association."

Another member explained that without intervention from their housing association their overcrowding situation may never have been resolved:

"I handed an application in to housing and they said, 'There is a 12-year waiting list you know'. That was 15 years ago. If my housing association had not moved me because of our overcrowding, my three children would still be sharing a bed."

An effective mobility system is therefore not simply a quality-of-life issue. It is an essential homelessness prevention and housing management tool.

Residents consider the current mutual exchange and homeswapping system to be outdated, poorly supported and heavily reliant on luck. Successful moves frequently require complex chains involving three or more households, creating barriers for residents with limited digital skills, language barriers, disabilities or low confidence in navigating housing systems. Several concerns were consistently raised:

- Insufficient support from councils and housing associations throughout the process.
- Complex and lengthy matching arrangements.
- Inconsistent advice and guidance.
- Limited promotion of mutual exchange as a legitimate housing option.
- Stigmatising language used in property advertisements, including residents explicitly excluding applicants from particular estates or neighbourhoods.
- Reports of residents offering financial incentives to secure exchanges, undermining confidence in the process.
- Being financially penalised for raising attention to having extra bedrooms while waiting for a suitable exchange

The result is a system that leaves larger homes underoccupied, families stuck in overcrowded conditions, and residents living in unsuitable accommodation for extended periods.

A well-functioning mobility system could free up family-sized homes, help older residents downsize, support disabled residents to access adapted homes, reduce pressure on waiting lists and improve resident wellbeing. Reforming mutual exchange should therefore be viewed as a core component of allocations policy rather than a separate housing management issue.

8. Domestic Abuse and Emergency Moves: When Survivors Are Left to Arrange Their Own Escape

The call for evidence asks specifically about the experiences of victims of domestic abuse. One G15RG member's account demonstrates how the allocations and mobility systems can fail survivors even when the evidence of risk is clear and documented.

The member had experienced domestic abuse and applied to her local authority for an emergency management move. She submitted substantial supporting evidence, including a police CAD reference number confirming that incidents had been reported. Despite this, the application was refused by an area manager.

"I had the evidence. I had a police CAD reference number. The area manager still turned my management move down."

With no route to a safe home through her landlord, she was left to arrange her own escape. Mutual exchange, a system designed for lifestyle and housing-need moves, not for safety, became the only option available to her.

The exchange was ultimately successful, but only through a three-way chain, and it took approximately eight weeks to complete. During that period, she experienced two further incidents of harassment from the perpetrator while still living at the address she was trying to leave.

"The paperwork side of it was smooth. But nothing about it was treated as urgent, and there was no recognition anywhere in the process that I was at risk while I waited."

This is the central failure. The administrative process functioned exactly as designed. What was entirely absent was any risk assessment, safety planning, prioritisation or confidentiality consideration attached to an exchange that was, in substance, an emergency move. A survivor who is refused a management transfer is not removed from danger. They are simply moved into a slower system with no safeguarding attached to it.

The member also lost a significant financial entitlement as a direct result of moving to safety. During the exchange she was advised that she would retain her accrued Right to Buy years because she was moving into a housing association property. That advice was incorrect, and the years she had built up were lost.

"I was told I would keep my Right to Buy years because I was moving to a housing association. I lost them. I lost something I had built up over years, because I had to move to be safe."

Survivors of domestic abuse should not be financially penalised for fleeing. Where a tenant moves landlord because their home is no longer safe, accrued entitlements should follow the tenant. At the very least, accurate written advice on the tenancy and entitlement consequences of an exchange must be given before the exchange completes, not after.

Her experience after the move was markedly more positive, and the contrast is instructive:

"When I moved into my housing association property, there was far more care and attention towards me than there had been when I lived under the local authority."

This is not an argument that one landlord type is inherently better than another. It demonstrates that the quality of support a survivor receives currently depends on who happens to be managing their tenancy, rather than on any consistent standard. Guidance should close that gap.

This account raises four issues for the review:

- Emergency management transfer decisions can rest on the discretion of a single officer, with no clear route of challenge, even where police evidence is provided.
- Where a management move is refused, mutual exchange becomes an unmanaged emergency route with no risk assessment, no urgency and no safety planning.
- Survivors can lose accrued housing entitlements, including Right to Buy years, as a direct consequence of moving to safety, and can be given incorrect advice about this.
- The eight-week duration of the exchange was itself a period of continued exposure to risk, during which further harassment occurred.

9. Equality, Diversity and Inclusion: Who Gets What, and Where

Most of the national conversation about allocations concerns who gets housed. Residents are equally concerned with a question that is rarely asked: **what people are housed in, and where.**

Allocation schemes are rarely discriminatory by intention. The barriers residents describe are structural. Criteria that appear neutral fall much more heavily on particular groups. Processes assume literacy, confidence, English and digital access. Suitability is assessed on paper rather than against what a landlord already knows about a household. And there is an almost complete absence of published data showing who the system serves well and who it does not.

Residents also observe that the nine protected characteristics rarely arrive one at a time. A household may include a disabled adult, an elderly parent, a carer, and a child with additional needs, in a family whose first language is not English. Assessment processes that consider one characteristic at a time will systematically underestimate the needs of the households facing the greatest disadvantage.

9.1 Qualification criteria: where most exclusion happens

The call for evidence asks specifically about local connection, affordability, debt and anti-social behaviour criteria. Residents' experience is that each carries a disproportionate impact:

- **Local connection and residency requirements** exclude the people most likely to have had to move. Survivors of domestic abuse who flee to another borough, refugees and people with recent leave to remain, care leavers, Gypsy and Traveller households, people leaving prison or institutional care, and members of the armed forces community all risk failing residency tests precisely because of the circumstances that created their housing need. The member whose account appears at section 8 lost her local connection in the act of escaping.
- **Debt and rent arrears criteria** penalise households in poverty, and disproportionately affect disabled people subject to benefit deductions and lone parents, who are overwhelmingly women. They also catch survivors of economic abuse who carry coerced debt taken out in their name. Disqualifying an applicant for a debt they did not choose to incur is not a neutral rule.

- **Anti-social behaviour criteria** can capture households where the applicant was the victim rather than the perpetrator, including survivors of domestic abuse where incidents at the property were recorded against the tenancy.
- **Affordability tests** can screen out disabled applicants and larger families before they reach the register at all.

9.2 Suitability: risk information held, but not acted on

The sharpest example residents raised concerns not whether a household was housed, but what they were offered.

A G15RG member described her adult daughter's experience. Her daughter has a diagnosed mental health condition. The landlord held that information. She also has a young child. The property she was offered was a two-bedroom flat in a high-rise block with access to the roof.

"They knew she had a diagnosed mental health condition. They had all of that information. They still offered her a property with access to the roof, with a two-year-old."

When her daughter attempted to challenge the offer herself, she was told that she was entitled to one offer only and that this property met her needs. It was only when her mother intervened as an advocate that the offer was reconsidered.

"Had I not stepped in, that is what she would have had to accept. She was told she was only allowed one property and that this one met her needs."

The second offer was a flat in a block with access to an unprotected balcony. The same risk, in a different form, had still not been considered. Only at the third attempt was she offered a two-bedroom house, which was suitable and which she accepted.

Three failures are visible in that sequence. The landlord held clear information about a known risk and did not apply it when assessing suitability. The single-offer rule was used to press a vulnerable applicant into accepting an unsuitable home. And the outcome ultimately depended on whether the applicant happened to have a capable advocate. Applicants without one are not protected by the system; they are simply not challenged.

The same member also observed what happened to the property afterwards:

"Every time I drove past, that property was empty. Two months it stood there. But you are telling people there are no properties."

This connects directly to the concerns raised at Key Issue 4. Homes are described as scarce while standing empty, and the pressure created by that scarcity is then used to justify offers that do not meet applicants' needs.

9.3 Reasonable adjustments: deadlines that only some applicants can meet

Residents described a further case, shared in confidence, in which a woman who is deaf and has a learning disability was moving because of anti-social behaviour and threats, having also experienced domestic abuse. She received an offer with a deadline to sign by a fixed date, driven by the landlord's need to fill the void.

She required an advocate present in order to view the property, and the property was not safe for her to visit unaccompanied at that time. Those arrangements could not be made within the deadline. Because she had not viewed and signed in time, the offer was withdrawn.

A deadline applied identically to every applicant is not equal treatment. Where an applicant requires a reasonable adjustment in order to take up an offer, and the adjustment cannot be delivered within the standard timescale, withdrawing the offer penalises the applicant for the landlord's failure to adjust. Residents believe this engages the duty to make reasonable adjustments under the Equality Act 2010, and that void performance targets should never be permitted to override it.

9.4 Advocacy determines outcomes

Both accounts above turn on the same point. In the first, an advocate was available and the outcome changed. In the second, an advocate was required and could not be arranged in time, and the offer was lost.

The introduction to this response records a member spending close to a decade securing suitable accommodation for a mother with significant medical needs, and having to invoke the Equality Act to get her banding lifted. That is the same pattern again. Challenging a decision requires literacy, confidence, persistence and some knowledge of equality law. The applicants least equipped to challenge are systematically those in the greatest need. At present, the fairness of an allocation depends less on the scheme than on the applicant's capacity to fight it, or their luck in having someone to fight on their behalf.

9.5 Process barriers

Choice-based lettings operate almost entirely online, on bidding cycles, in housing jargon. As one member said elsewhere in this response, applicants whose first language is not English are immediately alienated. Disabled applicants face the same problem in a different form: information not provided in accessible formats, and adapted homes that are not systematically matched to the people who need them. Older applicants and those without reliable devices or data are excluded by design rather than by decision.

Residents also note a wider cultural issue. Social landlords frequently describe themselves as delivering social welfare by virtue of being not-for-profit organisations, but that self-description is not always matched by practice at the point where decisions are made about individual households.

9.6 Where social housing is placed

Members also raised the question of where social housing sits. One member described a lifetime of social tenancies, each one beside a major road:

"I have lived in social housing all my life. First right next to Shepherd's Bush roundabout. Then I was moved next to Hammersmith roundabout. Then next to Fulham Broadway. All major polluted road arteries of London where there is much social housing"

Social housing is disproportionately located beside motorways, major junctions, railway lines with the associated air pollution, noise and poor outlook. Households with the least choice in the system are consistently placed in the parts of the city with the poorest environmental conditions, and they remain there across generations. This is a planning and development legacy rather than a decision made by any individual allocations officer, but its effects are experienced through allocations, and they fall along lines of income, disability and ethnicity.

9.7 The allocations question the Grenfell Inquiry left unanswered

Residents in the Grenfell community raised from the outset whether race and social status had played a part in how they were housed and how they were treated. It is important to be precise about what the Phase 2 report concluded, because the position on allocations is often misremembered.

The Inquiry found no evidence that racial or social prejudice influenced the decisions that left the tower in an unsafe condition. It did find some evidence of racial discrimination in how survivors were treated in the immediate aftermath, including a failure to have regard to the cultural and religious needs of Muslim residents observing Ramadan, and inadequate support for those who did not speak English as a first language.

On allocations, however, the Inquiry made no finding either way. The report stated explicitly that the question of how Grenfell Tower came to house a disproportionately large number of socially disadvantaged people, many from ethnic minority backgrounds, "lies outside our terms of reference". Wider questions about social housing and the treatment of social tenants had been excluded from the Inquiry's scope from the beginning, a decision criticised at the time by the Mayor of London, by local representatives, and by bereaved families and survivors, who regarded the review as an opportunity to address the question that was not taken.

The allocations question was not resolved. It was ruled out of scope, and it has never been answered since.

That is directly relevant to this review. More than nine years after the fire, there is still no published national evidence showing whether allocation schemes place households with particular protected characteristics disproportionately into the oldest, least desirable, poorest-condition, most polluted or highest-risk parts of the social housing stock. The accounts at 9.2, 9.3 and 9.6 all describe the same underlying concern from the resident's side: that the least desirable homes are offered to the households least able to refuse them.

The G15RG does not ask MHCLG to reach a conclusion on Grenfell. We ask it to close the evidence gap that the Inquiry identified but was not permitted to fill. This can be done as an act of good faith within this review, and there is unlikely to be a better opportunity.

The question is not whether individual allocations officers discriminate. Residents accept that in most cases they do not. It is whether the allocations system, taken as a whole, produces outcomes that differ by protected characteristic. At present nobody can answer that, because the data has never been collected or published in a form that would show it. Until it is, the perception of discrimination will persist, and neither government nor landlords will be able to say with confidence whether it is well founded.

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. Medical and welfare priority assessments should be applied consistently and communicated clearly to applicants to ensure fairness and widen accessibility.

2. Improve data and knowledge about your residents

Housing associations and local authorities should ensure resident data is accurate and regularly updated so they can identify when housing needs change. By proactively engaging with residents whose homes may no longer be the best fit, providers can offer tailored support, mobility advice and incentives to move voluntarily. This could help free up family-sized homes, reduce overcrowding, make better use of adapted properties and ensure residents can access homes that better meet their needs while retaining the security of their tenancy.

3. Improve Transparency and Communication

Require councils to introduce shared data systems and transparent reporting between councils and housing associations. This would improve coordination, reduce empty homes, and provide applicants clear and regular updates, 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.

4. 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. They should be invited to co-design solutions and contribute to future policy discussions. Establish a mechanism for residents to participate in periodic reviews of allocations policies. These should be realistic, manageable and monitored by the London Assembly.

5. 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.

6. Support Cross-Borough Collaboration

Develop formal agreements that allow housing associations and councils to share or exchange nominations across boroughs. This would enable quicker lettings and give residents a wider range of options. Local connection requirements should be reviewed to ensure they do not unfairly prevent residents from accessing homes that meet their needs.

7. 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 these homes. We support the G15's recommendation to review grant rates so that funding better reflects the cost of delivering family homes. Government should also review how rent structures, affordability assessments and housing benefit thresholds interact with housing mobility to ensure residents are not financially discouraged from moving to homes that better meet their needs.

8. Improve Strategic Partnerships with Housing Associations

Housing associations are not-for-profit organisations with the experience, scale and community presence to play a central role in reducing homelessness and increasing the supply of affordable homes.

Government, local authorities and housing associations should work together through long-term strategic partnerships that align allocations policy, homelessness prevention, housing delivery and investment decisions. Greater collaboration would help ensure homes are delivered where need is greatest, reduce competition for resources and improve outcomes for residents.

This should include a renewed commitment to delivering social rented homes, protecting existing homes from disposal wherever possible, and ensuring funding adequately reflects the cost of developing larger family homes and maintaining existing homes to modern standards

9. Reform Mutual Exchange and Housing Mobility

Government should recognise housing mobility as a core part of homelessness prevention and efficient housing allocation. A national review of mutual exchange and homeswapping services should be undertaken to create a more accessible, transparent and supported system. This should include:

- Dedicated mobility advice and support from landlords and councils.
- Improved matching systems across housing providers and local authority boundaries.
- Better support for disabled residents, older residents and those with limited digital access.
- Clear standards to address stigma and discriminatory language in property advertisements.
- Stronger oversight to prevent inappropriate financial incentives being used to secure exchanges.

- Greater promotion of mutual exchange, downsizing schemes and mobility options as part of routine tenancy management.

An improved housing mobility system would help residents access homes that meet their changing needs, free up underoccupied family homes, reduce overcrowding, make better use of adapted homes and ease pressure on waiting lists. It should be viewed as a strategic component of allocations policy rather than a separate housing management function.

Housing mobility should be recognised as a national housing priority. A secure tenancy should not mean remaining in a home that no longer meets a household's needs. Supporting residents to move throughout their lives would improve wellbeing, make better use of existing homes, reduce overcrowding and create a more responsive housing system.

10. Strengthen expectations on emergency management moves for survivors of domestic abuse

Statutory guidance should set a clear expectation that where a tenant provides evidence of domestic abuse, including a police reference, MARAC referral, IDVA support or equivalent, an emergency management move is presumed appropriate unless there is a documented reason otherwise. Refusals should not rest on the discretion of a single officer. Guidance should expect decisions to be made or countersigned at senior level, with written reasons and a clear, rapid route to review. Survivors should not have to escalate, appeal or self-advocate while still living at risk.

11. Treat safety-driven mutual exchanges as urgent and risk-assessed

Where a survivor proceeds to mutual exchange because a management move has been refused or is unavailable, the exchange should be flagged, risk-assessed and actively supported, with a named contact, a target timescale, safety planning for the period before the move completes, and protection of the applicant's address details throughout. Multi-way chains should be prioritised for processing. Government should also review how many survivors are using mutual exchange as a substitute for an emergency move, as this is a hidden indicator of management transfer systems failing.

12. Protect accrued entitlements where a move is driven by safety

Government should review the loss of accrued Right to Buy years and equivalent entitlements where a tenant changes landlord to escape domestic abuse, and ensure tenants receive accurate written advice on the consequences of a move before an exchange is agreed. Survivors should not lose long-held entitlements as the price of their own safety.

13. Require published equality impact assessments of allocation schemes

Every local authority should publish an equality impact assessment of its allocation scheme, refreshed whenever the scheme changes, stating explicitly how it has tested its qualification criteria for indirect discrimination. Equality duties should be evidenced in the design of the scheme, not left to individual applicants to invoke.

14. Collect and publish allocations data disaggregated by protected characteristic

Government should expect local authorities and registered providers to record and publish outcomes broken down by protected characteristic at each stage: applications received, reasonable preference awarded, disqualifications and the grounds for them, average waiting times, offers made, offers refused and withdrawn, lettings, and outcomes at review. This is the single most effective way to make disparities visible and aligns directly with the review's stated aim of improving data use and transparency.

15. Build exemptions into qualification criteria for those the criteria are most likely to exclude

Guidance should set a clear expectation that local connection and residency requirements are disapplied for survivors of domestic abuse, care leavers, refugees and those with recent leave to remain, the armed forces community, and people leaving institutional care. It should make clear that coerced or economically abusive debt must not be treated as disqualifying arrears, and that anti-social behaviour criteria must not disqualify applicants who were the victims of incidents recorded against their tenancy.

16. Make offers risk-informed, and end the single-offer trap

Where a landlord or local authority holds information about a household's known vulnerabilities or risks, that information must be applied when assessing whether a property is suitable, and the assessment should be recorded. Guidance should be explicit that building features presenting a foreseeable risk to a household, including roof access, unprotected balconies and unrestricted windows, must be considered before an offer is made. Refusal of an offer that is demonstrably unsuitable must not exhaust an applicant's entitlement, and applicants should receive written reasons and a right to review when a refusal is not accepted as reasonable.

17. Require reasonable adjustments throughout the offer, viewing and sign-up process

Offer deadlines must be capable of extension where an applicant requires a reasonable adjustment, including advocate-supported or accompanied viewings, interpretation, British Sign Language provision, accessible formats and non-digital routes at every stage. An offer must not be withdrawn where the delay is caused by the landlord's failure to deliver an adjustment. Void performance targets must not override duties under the Equality Act 2010.

18. Guarantee access to independent advocacy

Access to advocacy should be an entitlement rather than a matter of luck. Applicants with known vulnerabilities should be offered independent advocacy or a named support contact at the point of application, and again at the point of offer and review. No applicant's housing outcome should depend on whether they happen to have a capable family member willing to intervene.

19. Assess households intersectionally

Guidance should expect assessments to consider the household as a whole and the combination of characteristics and needs within it, rather than assessing a single characteristic in isolation. Households experiencing multiple, overlapping disadvantages are precisely those most likely to be underserved by single-issue assessment.

20. Answer the allocations question that fell outside the Grenfell Inquiry's terms of reference

Government should commission and publish national analysis of whether allocation outcomes differ by protected characteristic, examining not only whether households are housed but what they are housed in and where. This should cover the age, type, condition, known safety profile and environmental quality of the stock into which different groups are placed, including proximity to major roads and other sources of pollution and noise. Guidance should expect local authorities to monitor whether particular groups are consistently allocated into particular parts of their stock, and to act where a pattern emerges. The Inquiry was not permitted to examine this. This review can.

21. Ensure resident involvement is genuinely representative

The resident-led reviews proposed at recommendation 4 should be designed to include disabled residents, residents whose first language is not English, older residents, care leavers and residents from communities most affected by overcrowding. Involving only residents already confident in navigating the system will reproduce the blind spots the system already has.

Conclusion

Residents understand better than most that allocations policy operates within a housing system under immense pressure. However, scarcity alone cannot justify a system that is often inconsistent, difficult to navigate and insufficiently responsive to people's lives.

The experiences shared through this response reveal the reality behind waiting list statistics. They tell the story of families spending years in temporary accommodation, disabled residents trapped in unsuitable

homes, parents struggling with overcrowding, applicants removed from waiting lists after policy changes, and people feeling powerless within a system they do not understand.

As one former homeless resident recalled:

"When I was homeless, I used to walk the streets pushing my daughter in a pram, looking at all the empty properties and wishing I could live in one of them."

Another reflected on finally receiving a permanent home:

"When I moved into my 2 bed home after living in a single room with my family, it felt like a palace."

These experiences demonstrate that housing is about far more than allocation policies and waiting lists. A secure home provides stability, health, opportunity, independence and connection to community.

These experiences demonstrate that housing is about far more than allocations policies and waiting lists. A secure home provides stability, health, opportunity, independence and connection to community. The absence of a suitable home can have equally profound consequences, affecting mental health, employment, education, family life and long-term wellbeing.

For this reason, government must pursue a twin-track approach: building significantly more social rented homes while making better use of existing homes through a fairer, more transparent and more flexible allocations system. This includes supporting mobility, improving mutual exchange, reducing void periods, strengthening cross-borough cooperation and ensuring residents remain at the centre of policy development.

Allocations reform alone will not end homelessness. It must form part of a wider, long-term strategy that addresses the root causes of housing insecurity through sustained investment in social housing, homelessness prevention, decent existing homes and affordable rents. The cost of inaction will be borne not only by those without a home, but by communities, public services and future generations.

The G15 Residents' Group urges MHCLG to view allocations reform not simply as a housing management exercise, but as a key component of a national strategy to end homelessness, sustain communities and ensure London remains a city where people from all backgrounds can continue to live, work and thrive. Residents must be recognised not only as beneficiaries of policy, but as partners in designing the solutions.

Conclusion

The human impact behind waiting list statistics tell the story of families spending years in homeless or in unsuitable homes, suffering trauma.

As one former homeless resident recalled:

"When I was homeless, I used to walk the streets pushing my daughter in a pram, looking at all the empty properties and wishing I could live in one of them."

Another reflected on finally receiving a permanent home:

"When I moved into my 2 bed home after living in a single room with my family, it felt like a palace."

These experiences demonstrate that housing is about far more than allocations policies and waiting lists. A secure home offers more than a key in the door. It provides stability, opportunity, independence and the foundation for people to thrive.

The G15 Residents' Group recognises that there are no simple solutions to this complex challenge. A balanced approach is required, and residents must be recognised not just as those affected by policy, but as partners in shaping the solutions.

The G15 Residents' Group