



Report To:	Overview and Scrutiny Committee
Date:	9 th December 2025
Subject:	Revised Housing Allocations Policy BBC/ELDC
Purpose:	To follow recent changes in national guidance and legislation around Social Housing Allocations
Key Decision:	N/A
Portfolio Holder:	Councillor John Baxter, Portfolio Holder for Housing
Report Of:	Emily Spicer, Assistant Director – Communities and Housing Services
Report Author:	Tom Marsters, Housing and Homelessness Manager
Ward(s) Affected:	All
Exempt Report:	No

Summary

Recent amendments to national guidance and legislation on Social Housing Allocations have prompted a timely review of the shared policy currently adopted by Boston Borough Council (BBC) and East Lindsey District Council (ELDC).

These changes directly impact the assessment of housing need and the allocation of properties, making it imperative that our local policy is updated to ensure continued compliance and operational effectiveness.

Rather than implementing the revisions needed, this review has been approached as an opportunity to undertake an evaluation of the existing policy. The objective is to ensure alignment with current statutory requirements while enhancing the policy's capacity to serve residents effectively and support the strategic housing priorities of both Councils.

In progressing this work, we have engaged with Neil Moorland, Housing Consultants, to ensure the revised policy is legally robust and consistent with our intended outcomes. Additionally, we have collaborated closely with Portfolio Holder Councillor Baxter to ensure the policy reflects the values and aspirations.

Recommendations

That the Overview and Scrutiny Committee considers the draft Housing Allocations Policy at Appendix 2 and recommends it to Cabinet for adoption.

Reasons for Recommendations

- Incorporate new legal and regulatory changes
- Clarify and streamline processes for applicants and staff
- Improve fairness, transparency, and responsiveness in housing allocations
- Ensure the policy is fit for purpose in today's housing landscape
- We are committed to making the policy as clear, up to date, and useful as possible, both for those seeking housing and for the authorities administering it.

Other Options Considered

Do nothing - Failure to incorporate recent amendments to national guidance and legislation into the Social Housing Allocations Policy would result in the policy becoming non-compliant with statutory requirements. This non-compliance could render the policy unlawful, as local authorities are legally obligated to ensure that their housing allocation frameworks reflects current legislation.

1. Background

- 1.1 Recent changes in national guidance and legislation relating to social housing allocations have necessitated a review of the BBC/ELDC Shared Housing Allocation Policy currently adopted by both District Councils. These changes affect the way housing need is assessed and how properties are allocated. It is therefore essential that our local policy is updated to ensure compliance with statutory requirements and continued effectiveness.
- 1.2 Rather than implementing minor amendments, this review has taken a comprehensive approach. The aim is to ensure the policy not only reflects the latest legislative requirements but also delivers improved outcomes for residents and supports the Council's strategic housing objectives.
- 1.3 To support this process, the Council has engaged Neil Moorland, Housing Consultant, to provide expert advice and confirm the legality and robustness of the proposed policy. In addition, consultation has taken place with the Portfolio Holder, Councillor Baxter, to ensure the revised policy aligns with corporate priorities and desired outcomes.

2. Report

- 2.1 The Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025, effective from 10 July 2025, require all

local housing authorities in England to remove local connection and residency requirements when determining eligibility for social housing allocations for:

- Victims of domestic abuse who need to relocate because of that abuse.
- Care leavers (eligible, relevant, or former relevant children) up to the age of 25.

This statutory change ensures that these vulnerable groups cannot be excluded from housing registers based on local connection. Policy reviewed to comply with this requirement.

2.2 Local Connection Requirement - More explicit exemptions for domestic abuse victims and care leavers — they are automatically qualifying regardless of local connection.

Clarifies that reasonable preference alone does not guarantee high priority

Local connection and other factors still influence banding. Applicants without a local connection may still qualify if they meet a reasonable preference category but will be placed in lower bands (usually Band 3 or 4).

Adds Annexe A detailing how each category is assessed.

Introduces additional preference for:

- Armed Forces members (with backdating of banding).
- Care leavers
- Terminally ill applicants.
- Exceptional risk cases.

2.3 Financial Capacity - Introduces a £60,000 financial resource limit and more detailed exceptions (e.g., disability, older persons housing).

2.4 Housing related debt – Sets a £500 debt threshold and requires 8 consecutive weeks of repayment. More nuanced consideration of domestic abuse-related debt.

2.5 Banding and priority - Band 1 Criteria. Adds time-based criteria (e.g., Band 1 after 120 days of homelessness duty). More detailed corporate parenting and hospital discharge conditions.

2.6 Additional Preference- Same backdating rules, but criteria are more clearly defined and include exceptional circumstances.

2.7 Deliberate Worsening of Circumstances - Adds legal interpretation: only considered “deliberate” if there was a real choice between viable options.

2.8 Medical banding - Adds GP patient summary as free evidence. Clarifies review process and potential charges for independent assessments.

2.9 Banding for Homeless – Band 1 only after 120 days of accepted duty. Band 2 for those with priority need.

2.10 Applicants- Band 3 for others. More structured and time sensitive.

- 2.11 Non-Cooperation – Explicitly places non-cooperative applicants into Band 4.
- 2.12 Right to move eligibility – Adds apprenticeships as eligible. Clarifies evidence requirements and intent to take up employment.
- 2.13 Sensitive and direct letting - adds criteria for adapted properties, extra care schemes, and management transfers.
- 2.14 Refusals and non-bidding - Banding reduction after 1 refusal (Band 1 & 2), 2 refusals (Band 3). Band 4 not penalised.
- 2.15 Equality and inclusion - Adds commitment to Armed Forces Covenant, monitoring of demographic impact, and training for officers

3. Conclusion

- 3.1. The review of the Housing Allocation Policy incorporates significant legislative changes and operational improvements. Key amendments include compliance with the Allocation of Housing (Qualification Criteria for Victims of Domestic Abuse and Care Leavers) (England) Regulations 2025, ensuring these vulnerable groups qualify for housing without local connection requirements. Additional revisions clarify local connection exemptions, introduce financial and debt thresholds, refine banding criteria, and strengthen provisions for exceptional cases such as Armed Forces members, terminally ill applicants, and those at exceptional risk. The policy also enhances equality commitments, embeds clearer guidance on sensitive lettings, and introduces structured measures for non-cooperation and refusals. Collectively, these changes aim to ensure legal compliance, improve transparency, and deliver fairer outcomes for applicants while supporting the Council's strategic housing objectives.

Implications

South and East Lincolnshire Councils Partnership

None

Corporate Priorities

This Policy supports the Council's Corporate Plan (as referenced in the Capital Strategy), the key priorities are to:

Develop safer, stronger, healthier, and more independent communities, with a focus on protecting the most vulnerable.

Deliver the right services at the right time and in the right way, enhancing efficiency and responsiveness.

Staffing

The revised Housing Allocation Policy will streamline assessment processes, resulting in faster application handling. This will:

- Reduce assessment times, improving operational efficiency.
- Deliver a better customer experience through clearer criteria and quicker decisions.
- Shorten waiting periods for applicants.
- Provide a fairer and more equitable service for all individuals on the housing register.

These improvements align with the Council's commitment to delivering high-quality, accessible services for residents.

Workforce Capacity Implications

None

Constitutional and Legal Implications

None

Data Protection

None

Financial

None

Risk Management

None

Stakeholder / Consultation / Timescales

The revised Housing Allocation Policy has been developed following extensive consultation since May 2025 to ensure legal compliance, operational robustness, and alignment with national best practice. Engagement included:

External Stakeholders:

- Registered Housing Providers
- Lincolnshire County Council Occupational Therapy Team
- NowMedical, national experts in complex medical case banding
- Neil Moorland Housing Consultancy, to validate legality and policy ethos
- National benchmarking against comparable authorities

Internal Stakeholders:

- Housing, Homelessness, and Rough Sleeping Teams
- Disability Grant Funding and Adaptations Team
- Planning Department
- Ageing Well Team
- Temporary Accommodation Team

This collaborative approach ensures the policy reflects expert input, addresses local needs, and meets statutory requirements while delivering fair and transparent outcomes for applicants.

Strategic Alignment:

The consultation process and resulting policy changes directly support BBC/ELDC Council's corporate priorities by promoting safer, stronger communities, delivering services efficiently, and ensuring fairness and equality in housing provision.

Reputation

None

Contracts

None

Crime and Disorder

None

Equality and Diversity / Human Rights / Safeguarding

This policy has been ratified through an Equality Impact Assessment

Health and Wellbeing

None

Climate Change and Environment Impact Assessment

None

Acronyms

None

Appendices

Please note that due to the size of the documents the following appendices are available on the Council's website:

<https://democracy.boston.gov.uk/ieListDocuments.aspx?CId=339&MId=2368&Ver=4>

Appendix 1 - Housing Allocation Policy 2021

Appendix 2 - Housing Allocation Policy 2025

Background Papers

Sub Regional Housing Allocations Scheme and shared IT System (Housing Register & Homelessness) – Boston Borough Council and East Lindsey District Council

BBC Cabinet: 12th May 2021

ELDC Executive Board: 2nd June 2021

Document title

[Communities & Housing services - Allocations - All Documents](#)

Chronological History of this Report

Title	Version
BBC/ELDC Housing Allocations Policy	July 2025 V1
BBC/ELDC Housing Allocations Policy	September 2025 V2
BBC/ELDC Housing Allocations Policy	October 2025 V3
BBC/ELDC Housing Allocations Policy	November 2025 – Final edit

Report Approval

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