

Slough Borough Council

Report To:	Cabinet
Date:	20 July 2026
Subject:	Review of the Housing Allocation Scheme 2026-31
Lead Member:	Cllr Iftakhar Ahmed – Lead Member for Housing, Homelessness and Communities
Chief Officer:	Will Tuckley – Chief Executive
Contact Officer:	Karen Shaw – Interim Director of Housing Needs & Support
Ward(s):	All
Purpose of report:	For decision
Key Decision:	YES
Exempt:	NO
Decision Subject To Call In:	YES
Appendices:	Appendix 1: Allocations Policy 2026 Appendix 2: EQIA Appendix 3: Consultation Report Appendix 4: Allocations Policy 2018 Appendix 5: Summary of changes

1. Summary and Recommendations

- 1.1. This report sets out the review of the Slough Borough Council's Housing Allocation Scheme 2026-31 (referred to the report as The Scheme), including the amended policy, Equality Impact Assessment and outcome of the consultation, which aims to improve fairness and transparency when allocating available social housing in Slough to those in most housing need.
- 1.2 Recommendations:

Cabinet is requested to:

 - (a) Approve the amended Housing Allocation Scheme (The Scheme) as set out in Appendix 1;
 - (b) Approve the temporary suspension of the housing register for a maximum of 2 weeks to enable the migration and re-registration of housing applicants programmed for November 2026 to be completed.
 - (c) Note the implementation Plan in section 5 and the target date of 30th November to complete full implementation subject to any contingency measure required

- (d) Delegate authority to the Director for Housing Needs & Support following consultation with the Lead Member for Housing, Homelessness and Communities to:
- i. agree any Local Lettings Plans and changes to the percentage of Direct Offers to be made.
 - ii. Make minor amendments to the policy as and when required and approve decision makes where required in accordance with the Scheme.

Reason:

- 1.3 The Scheme is a statutory requirement of Part VI of the Housing Act 1996 (as amended by the Homelessness Act 2002 and the Localism Act 2011) and is kept under regular review to ensure compliance with the law and effectiveness in meeting local housing need. The Scheme was last reviewed and approved in 2018. The demand and supply of social housing, and the context in which the Council was operating, were different to the current climate. It is recognised that our current supply of social housing is not sufficient to meet the rising levels of housing needs. There have been several drivers behind the review of the Social Housing Allocation Scheme, including changes to national policy and legislation, a high percentage of lettings being for studios, 1-bedroom flats or 2-bedroom flats, with a vast shortage of larger accommodation and a need to review the current priority bandings to meet current housing needs. The Scheme has to prioritise the needs of many different groups whilst ensuring the Council makes best use of its available housing stock and of the housing association properties to which it has nomination rights.
- 1.4 A gap analysis was undertaken of the current Housing Allocations Scheme in December 2025 which identified the areas that needed to be strengthened and revised. This formed the basis for the revised draft presented to the Corporate Leadership Team in March 2026 for approval to consult.
- 1.5 The key drivers for the revised draft are:
- To improve the natural flow into eligibility, qualification, application, assessment, allocation, lettings, decisions and reviews.
 - To make the document more accessible for customers.
 - To reflect the Council's current priorities in allocating homes through its new housing allocations scheme.
 - To ensure that it meets all regulatory and legislative requirements.
- 1.6 To ensure The Scheme is compliant with current legislative regulatory and caselaw changes, streamlines priority bands to better meet demand, updating qualification and exclusions and strengthen the refusal procedure.

Commissioner Review

The Housing Allocation Scheme is a statutory requirement and, as such, the Council must be able to demonstrate that the Scheme is lawful, up to date, transparent, and effective in directing scarce social housing to those in greatest assessed need. The current Scheme

was last reviewed and approved in 2018. Since then, the operating context for Slough has changed significantly, with sustained pressure on housing demand, constrained supply, and a marked shortage of larger family accommodation. In the view of the Commissioners, the review is therefore both necessary and timely. It provides an important opportunity to strengthen the Council's allocation framework, ensure compliance with current legislation and policy expectations, support more consistent, evidence-based decision-making and better grip the budget position.

The Commissioners would also want to comment on paragraph 2.18 of the report specifically and express concern with the notion of the Allocations Panel being an elected Member panel, rather than an Officer one. Commissioners would have serious reservations about this on the grounds of risk, transparency, confidentiality, due process and the need for subject matter experts, i.e. Officers of the Council, to decide on operational matters of a highly sensitive nature. The review which is to be undertaken needs to be mindful of these matters and Commissioners would expect to be involved in this and the outcomes and decision making discussions arising from it.

2. Report

- 2.1 The Scheme is a statutory function of the Council. It should be reviewed every 5 years, sooner if there is a change in legislation or regulation. The current document was last reviewed in full in 2018 and is now due for review.
- 2.2 The Scheme sets out how the council will allocate the rented social housing which it owns and housing association properties to which it has nomination rights.
- 2.3 The Scheme does not apply to:
- 2.3.1 Homelessness Accommodation such as Emergency Accommodation and Temporary Accommodation (TA) which is dealt with in the Homelessness & Rough Sleeping Strategy and Placement Policy.
- 2.3.2 Extra Care Housing for Older People which is allocated in conjunction with an Adult Social Care panel.
- 2.4 The aim of Scheme is to meet local priority housing needs, make the best use of very limited social housing stock and be fairer to all by ensuring that those qualifying residents, who are in the most need of housing, wait as short a time as possible for an allocation of social housing.

Summary of main changes:

- 2.5 A detailed description of the changes to the Scheme is attached at appendix 5
- 2.6 Banding and Priority: it is recommended that Band A will be for emergency priority and will contain the fewest applicants in line with industry practice, Band B will be for urgent priority and Band C for moderate priority. The table below shows the revised housing need categories in each band.

Band	Housing Need
Band A (Emergency Priority)	Emergency Health Priority, fleeing violence (domestic abuse, risk of serious harm or death), management transfers, public or witness protection, insanitary conditions, emergency decants, under occupation and release of a significantly adapted property.
Band B (Urgent Priority)	Homeless – prevention, relief and main duty, urgent health award, care leavers, fostering or adoption, move on, urgent decants, Overcrowding (2B +)
Band C (Moderate Priority)	Homeless - non – priority and intentionally homeless, overcrowding (1B), key workers and right to move

2.7 Household Income Threshold

It is proposed to reduce the household income threshold from £55,000 per annum to £39,059, this being linked to the office of national statistics average annual income for the borough. Future applicants with an income over the threshold will not be able to join the register as they will be deemed able to find a home in the private sector. This will be reviewed figure annually. During the consultation there was 34% disagreement, and 52% agreeing that social housing should be prioritised for those most in housing need.

2.8 Savings, Assets and Capital Threshold

In line with the principles above, it is proposed to reduce the savings threshold from £20,000 to £16,000. This is to make it align with the threshold set for Universal Credit and adopted by many local authorities, but exceptions may be made for those who are vulnerable or have a specific medical need.

2.9 Adequately Housed

It is recommended that anyone who is adequately housed will no longer be permitted to join the Housing Register. Allowing residents with no housing need recognised by the Scheme creates an expectation of the potential for rehousing which is unrealistic as this group would have the lowest available priority and likely never get an offer. Allowing them to register would mislead them into believing they may be successful. It also ignores the high levels of need which will more than account for available housing supply.

2.10 Refusal of a single offer

There is currently no penalty for unreasonably refusing an offer and it is recommended that any unreasonable refusal of an offer of suitable accommodation will result in the removal from the Housing Register for 12 months subject to the right of review and statutory rights to challenge the decision.

2.11 Former members of the Armed Forces

We are governed by legislation when dealing with former members of the armed forces and their family members. Currently there is a five-year qualifying period and to comply with statutory requirements, this condition will be removed.

2.12 Young Carers

Many full-time carers are young and living as part of the household of the person needing care. Often, they have siblings and have to share a bedroom. Adult carers who live in, are awarded their own bedroom. In the interest of fairness, we are proposing to award a young carer their own bedroom for the duration of the time that they are providing the care.

2.13 Sharing a bedroom with a child of the same sex

Currently children of the same sex share up to the age of 16. We are proposing to raise this to 18. By raising the age, it will allow the Council to manage the demand for these larger units to those who are severely overcrowded.

2.14 Community Contribution:

Currently applicants with a community contribution are awarded Band B. During the consultation it was proposed to change this to a lettings target of 2% for 2026/27 which was supported by 54% of respondents. However, having considered the responses during the consultation who disagreed, legal advice, the results of the Equality Impact Assessment, it was concluded that retaining this clause would potentially be discriminatory, i.e. awarding greater priority to someone who is working over someone who is not. It is therefore recommended removing of this section entirely while granting fostering and adoption to be prioritised in Band B.

2.15 Adult child of tenant

We are proposing to introduce the option to rehouse young adults aged 18 or over, into a studio or 1 bedroom property, to remove or significantly reduce the overcrowding of the main household. The applicant or the young adult can make the request. Large family properties are in short supply, and this will allow us to either reduce the overcrowding in the main household or remove it completely.

2.16 Allocation of a property until Choice Based Lettings

We will continue the same allocation process until Choice Based Lettings is introduced in 2027. Direct offers will be restricted to specific types of applicants such as homeless households in temporary accommodation or a vulnerable adult subject to any other local lettings plan being agreed in the future.

2.17 Homeless Households

In addition to the banding changes covered above, we will use direct offers to move on some households in temporary accommodation where this is deemed necessary and raise the annual homelessness lettings target from 65% to 70% for 2026/27 and it will be reviewed every 3 months.

2.18 Housing Allocations Panel

The scheme introduces a new Housing Allocations Panel, consisting of subject matter experts from within the housing staff team, who will make a number of exceptional decisions, including agreeing cases to receive a direct let; approving sensitive lets; dealing with appeals after a review of a decision under the scheme; considering exceptional circumstances and monitoring RP nominations. Following post consultation feedback from elected members they have suggested making this panel a member rather than officer one as they are of the view it may increase accountability and transparency. A review of other local authority policies will be conducted to consider whether such a proposal would lead to increased accountability and transparency as well as to see if such member panels even exist elsewhere. If the Council then wanted to change the panel in this way, there would be a need for further consultation, as it would be an amendment to the current scheme.

2.19 Consultation:

Local authorities are legally required to undertake formal consultation when proposing to introduce a new or revised Housing Allocations Scheme. Following approval to consult in March 2026, the consultation ran for 9 weeks from the 10 March 2026 and the 11 May 2026 with the following key stakeholders:

- Applicants on the Housing register some of whom may be impacted by the revisions if approved.
- Homeless households in temporary accommodation.
- Residents of the borough.
- Resident Board
- Hard to reach groups such as care leavers, gypsies, and travellers.
- Councillors.
- Registered providers with stock in the borough
- External agencies who work with the council or on behalf of residents of the borough.
- Internal stakeholders within the Council.

2.20 We undertook the consultation via an online survey hosted by Campbell Tickell Ltd. We had a 38% response rate which exceeded the acceptable range for an indicative sample size. Overall, the agreement was 40% and over for each of the proposed changes apart from the Community Contribution Section where It is recommended that it is removed in its entirety because of the risk of discrimination and replaced with fostering and adoption in Band B.

2.21 A full consultation report is attached (appendix 3).

3 Options considered

3.1 The following options were considered:

- Option 1: To not review and amend the Housing Allocation Scheme. **This option is not recommended.** Not reviewing the Housing Allocation Scheme would hinder the council's ability to comply with its statutory duty and would not reduce the risk of legal challenge.
- Option 2: To review and amend the Housing Allocation Scheme. **This option is recommended.** Reviewing the Housing Allocation Scheme is necessary for the Council to comply with its statutory duty and to reduce the risk of legal challenge.

4 Implications of the Recommendation

Implementation Plan

4.1 A full implementation plan has been developed to prepare for the Scheme being put in place.

4.2 Subject to Cabinet approval of the new policy, a full re-registration exercise will be undertaken. If the Scheme is approved, the revised Scheme is programmed to be implemented from 30th November 2026 and will apply to all existing applicants, as well as new applicants seeking to join the council's Housing Register. However, it is important to include a contingency period which may extend the implementation period to allow for the full re-registration to be completed accurately. Applications currently being processed as part of the backlog clearance (originating over a 2-year period as a result of staff shortages and systems failures), will be recorded with basic details only, and applicants will be issued with the new application form after 20 July as part of the re-registration process.

- 4.3 A dedicated Project Team has been established to implement the required changes. It is anticipated that an implementation period will be completed by 30 November but may require longer to ensure the Housing Register is accurate, up to date, operating without backlog. It is estimated that approximately 3,000-3,500 existing and backlog applications will require assessment. The primary method for issuing and receiving applications will be via a digital application form.
- 4.4 The Project Team is exploring options to streamline the re-registration process and reduce reliance on individual manual entry. However, the proposed six-month implementation period assumes that applications will need to be processed manually. The exercise will involve a full reassessment of applicant's eligibility and housing need under the revised Scheme, rather than a review of existing applications, as this approach is considered to be more accurate and efficient. In light of the scale of the exercise and the need to ensure a smooth and transparent re-registration process, an implementation period from 21 July to end of November will be required.
- 4.5 The council will take reasonable steps to notify those effected by the proposed changes and will provide additional support to vulnerable residents through the Hubs by appointment. A comprehensive communications plan will be implemented to ensure all Housing Register applicants and residents are informed of the changes. This will include direct notifications, website updates, and social media posts.
- 4.6 A press release, supported by social media engagement, will be issued in advance of the revised Allocations Policy coming into effect. The council's website will also be updated to include the revised Policy alongside a summary of the key changes. In addition, all staff involved in Housing Register functions, as well as staff across the wider Housing Service, will receive training on the revised Policy. Information sessions will also be delivered to relevant internal departments and external partners, including Customer Services, Adults and Public Health, Children's Services, and Registered Providers to ensure a consistent understanding of the changes and to support the provision of accurate advice to residents.
- 4.7 Should full implementation not be achieved by the end of November 2026, the council may need to temporarily suspend the housing register for a period of up to 2 weeks. This contingency is intended to enable the completion of any outstanding system migration and the re-registration process to be completed without disruption.

Communication with Stakeholders and Residents:

- 4.8 A comprehensive communications plan will be delivered to inform existing applicants, new applicants, registered providers (Housing Associations), council services, key stakeholders and the general public about the changes, the rationale, and how they will be affected. This is not a consultation and no further changes will be made. The consultation results already have been considered and changes made as stated in the report under paragraphs 2.5 to 2.17 and Appendix 3.

Timeline Development:

- 4.9 Our website will be updated following Cabinet approval of the changes and a clear schedule with a "go-live" in December 2026 for the reviewed Scheme. Drop-in events will be held at the Hubs for applicants to understand how the new Allocation Scheme applies to them and managing the agreed changes will be supported by the Director of Housing Needs and Support. Following the completion of re-registration and NEC

migration, all applicants will be placed into the new Bandings based on their current priority need group.

Application Migration to revised Bandings:

- 4.10 Notification of the changes to applicants will be by a system generated letter and will clearly set out the changes. There will also be access to a summary of the reviewed Scheme with translation options.

Monitoring and Review:

- 4.11 There will be a post-implementation review after one year to assess the impact of the changes, measure outcomes, and ensure compliance with legal obligations and the council's strategic priorities.

IT System Updates:

- 4.12 There are a number of system updates and upgrades that are required to ensure that the re-registration process can occur smoothly and accurately. This review will involve updating the existing system and is already on-going. The Project Team are leading on updating of the housing systems to reflect the reviewed Scheme and will ensure the functionality of changes which will improve processes.

Training:

- 4.13 Training on procedures for relevant staff who will be delivering the changes to bandings, refusals and making direct offers will be implemented. This will take the form of providing training by the relevant managers within Housing Needs and Housing Services, whom will in turn deliver training to their staff members and colleagues. Selected training sessions will be considered for colleagues in the wider Council who will need to be aware the Scheme changes, specifically Customer Services, but also Children Services, and Adults and Public Health, which will take place prior to November 2026 alongside training scheduled for Members.

5 Financial implications

- 5.1 The report proposes that Cabinet approves the amended Housing Allocation Scheme to improve fairness and transparency when allocating available social housing to those in most need of social housing. The costs of administering the new amended scheme is already provided for in existing service budgets. Any additional budget requirements arising from the amended scheme will be identified and reflected the annual budget setting process as required.

6 Legal implications

- 6.1 The council's Housing Allocation Scheme is a statutory requirement under Part VI of the Housing Act 1996 as amended by the Homelessness Act 2002 and the Localism Act 2011 (the "Act").
- 6.2 Section 166A(1) of the Act requires every local housing authority to have an allocation scheme ("the scheme") for determining priorities between qualifying persons. It is best practice to review the scheme regularly (i.e. every few years) to ensure compliance with legislation and good practice and that the scheme is addressing housing need effectively.

- 6.3 The allocation of housing by local housing authorities is regulated by Part 6 of the Housing Act 1996. Section 159(1) of Housing Act 1996 requires that local housing authorities must comply with the provisions of Part VI when allocating housing accommodation. However, subject to this compliance, authorities may otherwise allocate housing in any manner they consider appropriate: section 159(7) Housing Act 1996.
- 6.4 In formulating or amending its scheme, the council must have regard to its current homelessness strategy under section 1 of the Homelessness Act 2002. The Act requires local housing authorities to give reasonable preference to applicants with high levels of assessed housing need. The scheme may be framed to give additional preference to particular descriptions of people (section 166A(5), HA 1996). However, a local housing authority must not allocate housing accommodation except in accordance with its allocation scheme: section 166A(1) HA 1996.
- 6.5 As a result of changes made by the Localism Act 2011, with effect from 18 June 2012, local housing authorities have been able to decide who “qualifies” for an allocation. Accommodation can therefore only be allocated to someone who qualifies under those local criteria (section 160ZA(6) Housing Act 1996) and local housing authorities can largely determine who qualifies (section 160ZA(7) Housing Act 1996).
- 6.6 The Secretary of State does however have the power to prescribe classes of persons who are, or are not, to be treated as qualifying persons: section 160ZA(8) Housing Act 1996.
- 6.7 Where alterations to the scheme reflect a major change in policy, the council has a legal duty to consult with those affected by the changes including Registered Providers with which they have nomination arrangements with. As detailed above the Council commenced an 8-week consultation of the draft policy on the 10 March 2026 .
- 6.8 The Council’s Constitution defines a ‘key decision’, which includes a decision likely to be significant in terms of its effects on communities living or working in an area of two or more wards of the Borough. The Constitution further states the Cabinet is responsible for all key decisions.
- 6.9 When considering whether to approve the amended policy, the council must have regard to the following statutory duties:
- i. Allocation of housing accommodation under Part VI Housing Act 1996;
 - ii. The need to safeguard and promote the welfare of children under s.11 (2) Children Act 2004;
 - iii. S.149 public sector equality duty under the Equality Act 2010;
 - iv. Due regard to:
 - The unique obligations of, and sacrifices made by the armed forces;
 - The principle that is desirable to remove disadvantages arising for service people from membership, or former membership, of the armed forces, and

- The principle that special provision for service people may be justified by the effects on such people of membership, or former membership, of the armed forces.

7. Risk management implications

7.1 Risk Table

Risk	Mitigations	Description RAG Status
The Council fails to meet its statutory duties.	Reviewing the Social Housing Allocation Scheme ensures that the council complies with its statutory duty.	Green
The Council is at risk of legal challenge.	Reviewing the Housing Allocation Scheme to ensure it is compliant and up to date reduces the risk of legal challenge and the associated financial impact.	Green
The revised Allocations Scheme is not adequately publicised, communicated or brought to the attention of residents	The revised Housing Allocation Scheme will be publicised on the council's general website, all applicants on the Housing Register will be notified.	Green
The revised Allocations Scheme is too complex and difficult for residents to understand	A key aim of the revised Allocation Scheme is to ensure residents and staff can understand the context of the policy.	Green
The revised Allocations Scheme lacks transparency	The revised Allocation Scheme demonstrates openness and transparency as set out in the consultation process and implementation	Green
The revised Allocations Scheme is perceived as discriminatory or otherwise unfair	An EIA and an independent legal review have been carried out to ensure the revised Allocation Scheme not perceived to be discriminatory or unfair	Green
Complaints from residents significantly increase because of changes to the Scheme	A comprehensive communications plan is in place to inform existing applicants, new applicants and registered providers to reduce the risk of complaints increasing	Green

The Implementation Plan deadline is missed	The current plan is for 4 months, but requirement for a contingency will be monitored throughout the period	AMBER
The use and cost of temporary accommodation continue to increase and put pressure on the General Fund.	The Housing Allocation Scheme provides priority in Band B for those that have applied for social housing and are temporary accommodation which impacts on the General Fund. However, it is one of a number of “move-on” accommodation and the Housing Register is not a solution to the crisis in homelessness and housing more generally	RED

8. Equality implications

8.1 When formulating policies, the council must give due regard to the public sector equality duty, including considering any potential impact on protected groups. It is important to ensure that no aspect of the policy gives rise to indirect discrimination against individuals with protected characteristics.

8.2 Section 149 of the Equality Act 2010 requires public bodies to have due regard to the need to:

- eliminate discrimination, harassment, victimisation, and any other conduct prohibited by the Act;
- advance equality of opportunity between individuals who share a relevant protected characteristic and those who do not; and
- foster good relations between individuals who share a relevant protected characteristic and those who do not.

8.3 The relevant protected characteristics include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership.

8.4 Having due regard to advancing equality of opportunity involves, in particular, considering the need to:

- i. remove or reduce disadvantages experienced by individuals connected to a protected characteristic;

- ii. take steps to address the specific needs of individuals with protected characteristics where these differ from others; and
- iii. encourage participation in public life or other activities where such participation is disproportionately low among those groups.

8.5 Accordingly, when making a decision in respect of this policy, the Council must consider the Public Sector Equality Duty and assess any potential impact on protected groups, with particular regard to the impact on:

- i. Raising the Age for Same-Sex Bedroom Sharing;
- ii. Income and Savings threshold;
- iii. Medical Priority Awards;

8.6 Accordingly, an Equality Impact Assessment (EIA) has been undertaken in relation to the proposed changes. It sets out how potential indirect discrimination in the amended policy can be identified, evaluated and monitored, ensuring compliance with the Equality Act 2010 and equitable treatment across all groups. A test of relevance and a full equality impact assessment have been undertaken. These are attached to this report. There are two documents embedded within the EIA; the demographic profile of the current register and the housing register impact assessment both constructed from the data available from the current housing register.

8.7 In essence the majority of the 9 protected characteristics are not impacted by the proposed changes.

8.8 The impacts are as follows:

- There is a positive impact on age; young carers are to be allocated their own bedroom in line with adult carers and adult children in overcrowded council tenancies will have the option to apply for a bedsit to alleviate the overcrowding in the main household.
- There is a negative impact on sex; same sex sharing is to rise from 16 to 18 to make best use of the limited supply of social housing in the borough and the lengthy waits for larger properties.
- There is a positive impact on former members of the armed forces who may join the register regardless of how long ago they were discharged from the services. The overall size of the register will drop from 2382 to 2375 as applicants are asked to re-register following approval of the policy. Adequately housed applicants, those with a household income or savings over the threshold will not be able to join. There may be a further reduction as the data is cleansed during the ICT implementation.
- Community Contribution has been removed in its entirety with the removal of employment as a priority while retaining, fostering, adoption and carers.

9. Corporate Parenting Implications

9.1 Care leavers experience negative impacts on their life chances. As a corporate parent the local authority looks for opportunities to ensure care leavers are supported to level up. The Housing Allocations Scheme gives priority to care leavers for a social housing offer and ensures they are not negatively impacted by residence criteria.

Background Papers

None