



Who is being allocated social housing in London?

Summary

- 1 London has long waiting lists for social housing which have grown by 60% in the past eight years.
- 2 Priority for social housing is given to those declared technically "homeless" or those living in overcrowded conditions.
- 3 The impact of immigration is downplayed or denied.
- 4 Official data is available on the nationality of those allocated social housing. It shows that at least 11% of social housing lets in London were given to foreign nationals. In the boroughs of Ealing and Haringey nearly half of all social housing lets went to foreign nationals.
- 5 The official data is patchy. Some boroughs have a large number of lets that went unreported in the data, in some cases more than half.
- 6 Other boroughs reported the lets but with a large proportion of tenants, in some cases more than a third, refusing to respond on nationality (which is optional). By contrast, in the rest of England only 1.5% of respondents are recorded as having refused to disclose their nationality.
- 7 As a result of this very poor coverage, only a limited proportion of social housing can be confirmed as going to British nationals, in some boroughs as low as 37%.
- 8 Most local authorities refused to answer Freedom of Information requests on who is getting social housing or claimed to be unable to do so.
- 9 Migration Watch recommends that it be made compulsory for the tenant's nationality to be recorded and published for all social housing lets. We also call for a debate over who should be entitled to social housing in the UK.

Introduction

10 This paper examines the official statistics on social housing lets and nationality for the financial year 2010/11 so as to analyse the extent to which foreign nationals are being allocated social housing in London. It also reports the results of Migration Watch's Freedom of Information requests to the Housing Departments of a number of London Boroughs.

11 To examine the impact of immigration it is necessary to look at who is being allocated social housing properties when they become available i.e. new lets. The IPPR and EHRC have previously tried to downplay the impact of immigration on social housing lets by reporting that less than 2% of all social housing residents are people who have moved to Britain in the last five years¹. They achieved this very low figure by confining their study to those who had

1 <http://www.ippr.org/publications/55/1715/social-housing-allocation-and-immigrant-communities>

recently arrived and then making a comparison with the total of all existing lets throughout the country.

12 London is a hugely diverse city with around one third of its residents born overseas. Many have become naturalised as British citizens. This paper looks solely at the current nationality of those being allocated social housing. If they are foreign nationals they will either be more recent immigrants or they will have decided not to apply for British nationality.

Providers

13 Social housing is provided by both local authorities and Housing Associations. Applicants for social housing must normally join the local social housing register. Often local councils and Housing Associations operate a Common Housing Register where applicants' details are available to all housing providers. Housing associations have agreements with local authorities on the proportion of their properties that will be re-let to tenants referred to them from the local authority (up to 100%). The Housing Association can choose to whom it re-lets the remainder of its vacancies.

Who is prioritised for social housing

14 The waiting list for social housing in London increased by 60% between 2002 and 2010 to 362,300. As the demand for social housing is much greater than supply, local authorities prioritise applicants. Councils and Housing Associations may operate their own prioritisation criteria or they may set a Common Allocations Policy.

15 Many councils sort their applicants into priority bands (e.g. 1 is high priority and 4 is low priority) while others score the applicants according to certain criteria. Legally, priority has to be given to those who have "reasonable preference". These are applicants who are technically "homeless" or in overcrowded conditions. Homelessness "does not just refer to those without a roof, you may be legally classed as homeless if you are sleeping on a friend's sofa, staying in a hostel, suffering from overcrowding, or other bad conditions".² A common cause of overcrowding relates to family size. Criteria relating to the required number of bedrooms depend on the number, age and sex of the children³.

16 In 2009 the last government set out guidance on social housing allocations which made much of the fact that, alongside giving priority to those with "reasonable preference", local authorities were to be given the flexibility to adjust their allocations policy towards those with a local connection or who had been on waiting lists a long time.⁴

17 Most London local authorities include the concept of "local connection" in their allocation policies. This is used to decide who gets priority if all other attributes are equal and, in some cases, to decide who can join the housing register. However, this "local connection" criterion is often very weak. It can be met by just being resident in the borough at the time of the application or for a period of a few months prior to the application. As long as the "local connection" criterion is met no further distinction is then made between someone who has lived in the area for a long time and someone who has recently moved to the area. The following examples illustrate the variation around "local connection" in the London Boroughs:

- Southwark makes no distinction around "local connection";
- Lewisham just requires the applicant to be resident in the borough;
- Barking & Dagenham consider the criterion to be met by being resident in the borough for six of the last twelve months;
- Newham is currently consulting over requiring applicants to have been continuously resident in the borough for two years before they can be accepted on the housing register⁵.

18 Westminster, which prioritises applicants through a point scoring system, awards points to those who have been

2 http://england.shelter.org.uk/get_advice/homelessness

3 http://england.shelter.org.uk/get_advice/repairs_and_bad_conditions/home_safety/overcrowding

4 <http://www.communities.gov.uk/publications/housing/allocationsstatutoryguidance>

5 Local authorities are required to publish their housing allocation policies. They are all available online.

resident in the borough for over ten years (although much fewer points than those given to applicants who are overcrowded or homeless). However, it does reserve some properties solely for those with an “established local connection” with the borough⁶.

19 More generally, consideration is given to applicants who have been on the waiting list for a long time but only in comparison to other applicants deemed to be in the same priority category. Applicants considered a higher priority (overcrowded or homeless) usually take preference.

20 In London as a whole single people, couples or families who are not classified as homeless or overcrowded are usually given the lowest priority and have little hope of ever being housed. Councils may also disqualify certain residents from even joining the housing register, for example if they earn above a salary threshold (e.g. £30,000 per annum for Lewisham).

Immigration Status and Eligibility - Local authority social housing

21 Main applicants can go on the local authority social housing register if they:

- are EEA nationals
- have been granted Indefinite Leave to Remain (ILR)
- have refugee status or a grant of Humanitarian Protection
- have been granted Exceptional Leave to Remain (ELR)

Grants of ELR are often given to applicants who do not meet the criteria to remain in the UK under the immigration rules but a decision to grant leave has been based on Articles of the European Convention of Human Rights (e.g. article 8: the right to family life). The situation with Housing Associations own vacancies appears more complex with one prominent housing advice website suggesting that applicants cannot be refused a place on the waiting list solely because of their immigration status.⁷

CORE Data

22 The Continuous Recording of Sales and Letting (CORE) is a national information source funded jointly by the Tenant Services Authority and the Department for Communities and Local Government (DCLG). It records information on the characteristics of new social housing tenants in both Housing Association and local authority homes as well as existing social housing tenants transferring to a new property⁸. In 2010/11 it covered 60% of all local authority lets and nearly all housing associations⁹.

23 Lettings data is divided into “General Needs” and “Supported Housing”. The bulk of social housing is covered under “General Needs”; this is the category referred to in this paper. The data does not include the housing of asylum seekers while they are awaiting decisions on their applications.

24 Data on letting is gathered by an interview with each new tenant after the home is allocated. The interview is designed to record a number of characteristics about the new tenants - one of which is nationality. The questionnaire is completed by the housing provider. The local authority will interview tenants going into local authority homes while housing associations will interview those allocated a home with a housing association. The question on nationality is **optional**. See Annex A – CORE Lettings log for a scanned copy of the questionnaire.

6 Wesminster Housing Allocation Scheme, paragraph 16.4 http://transact.westminster.gov.uk/docstores/publications_store/Housing%20Allocation%20Scheme2011.pdf

7 <http://www.housing-rights.info/housing-associations.html>

8 <https://core.tenantservicesauthority.org/LearnAboutCore/LACPurposeAndBenefit.aspx>

9 Page 1 CORE Statistical Release <https://core.tenantservicesauthority.org/AnalyseData/ASDPublication.aspx?TypeOfDocumentId=2&TypeOfDocument=Annual%20CORE%20factsheet>

25 The CORE website includes a reporting tool to allow the user to report on various attributes of those allocated properties by local authority area. This includes lettings both in local authority properties and housing associations.

26 For the rest of England, in 2010, 88% of social housing lets were recorded as going to British nationals, 5.5% to foreign nationals, 5% were unknown and 1.5% were marked as having refused to answer.

27 The proportion of social housing lets in London covered by the CORE data varies according to the borough. Some boroughs had almost all relevant social housing lets recorded in the CORE data while others only recorded a minority. Table 1 below shows the variation in coverage and includes some of the boroughs with a big discrepancy between the number of lets recorded in CORE and the actual number of lets that took place (as given in response to FOI requests asking "How many applicants for social housing to [borough] were allocated social housing in the financial year 2010/11?")¹⁰.

Table 1: Social housing lets by borough

Borough	Total Local Authority Lets	Lets Recorded in CORE	% Coverage by CORE
Newham	1207	478	40%
Greenwich	1877	814	43%
Lambeth	2300	1059	46%
Hackney	1763	839	48%
Croydon	1094	592	54%
Camden	1253	785	63%
Haringey	862	565	66%
Tower Hamlets	2194	1483	68%
Southwark	2742	2574	94%
Wandsworth	1008	1008	100%
Barking & Dagenham	1039	1193	100%
Islington	1306	1471	100%
Lewisham	1607	1833	100%
Merton	367	431	100%

28 The local authority lets include lets in council owned or managed stock and nominations to housing associations. The CORE data should include this plus any additional lets made from the housing associations' own waiting lists. Therefore, if there was full coverage in CORE, the total should exceed the number of local authority lets. This is the case for Merton, Islington and Lewisham. However, responses to FOI requests revealed that other boroughs have a huge number of lets not being recorded in CORE. Less than half of social housing lets in Lambeth and only 40% in Newham are covered in CORE.

29 London Boroughs can be divided into Inner London¹¹ and Outer London¹². The number of social housing lets, as recorded in CORE, were fairly evenly split between Inner and Outer London with just over half of all social housing lets (54%) occurring in Inner London. Figure 1 below shows the nationality of the main tenant for social housing lets in Inner London, while figure 2 shows the same data for Outer London.

10 Information obtained through FOI requests.

11 Inner London as defined by the ONS: Camden, Hackney, Haringey, Hammersmith and Fulham, Islington, Kensington and Chelsea, Lambeth, Lewisham, Newham, Southwark, Tower Hamlets, Wandsworth, Westminster

12 Outer London as defined by the ONS: Greenwich, Barking & Dagenham, Barnet, Bexley, Brent, Bromley, Croydon, Ealing, Enfield, Harrow, Havering, Hillingdon, Hounslow, Kingston upon Thames, Merton, Redbridge, Richmond, Sutton and Waltham Forest

Figure 1: CORE data for Inner London Social Housing Lets by nationality

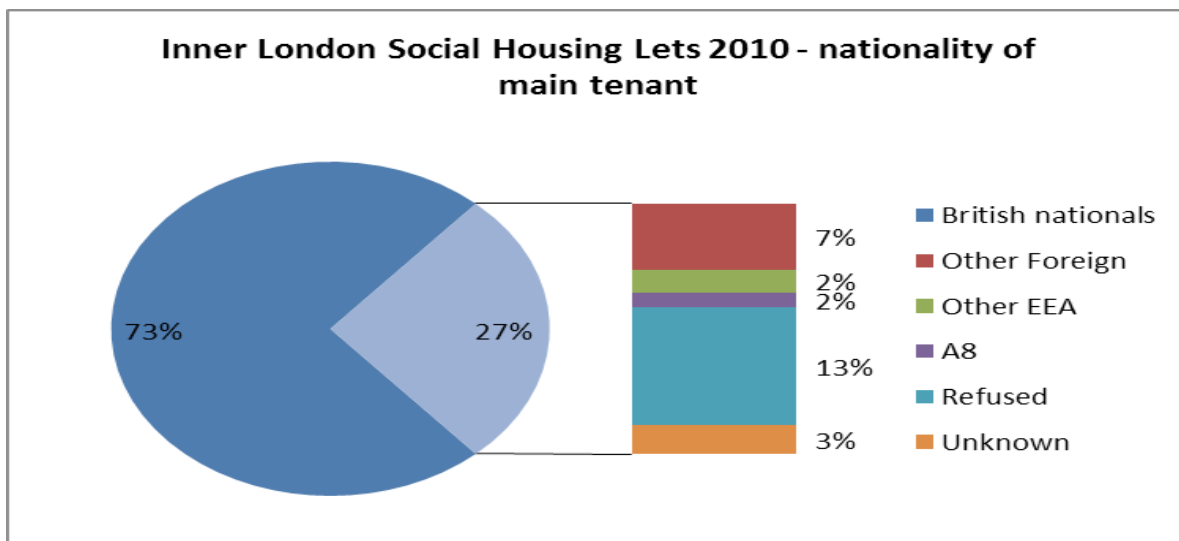
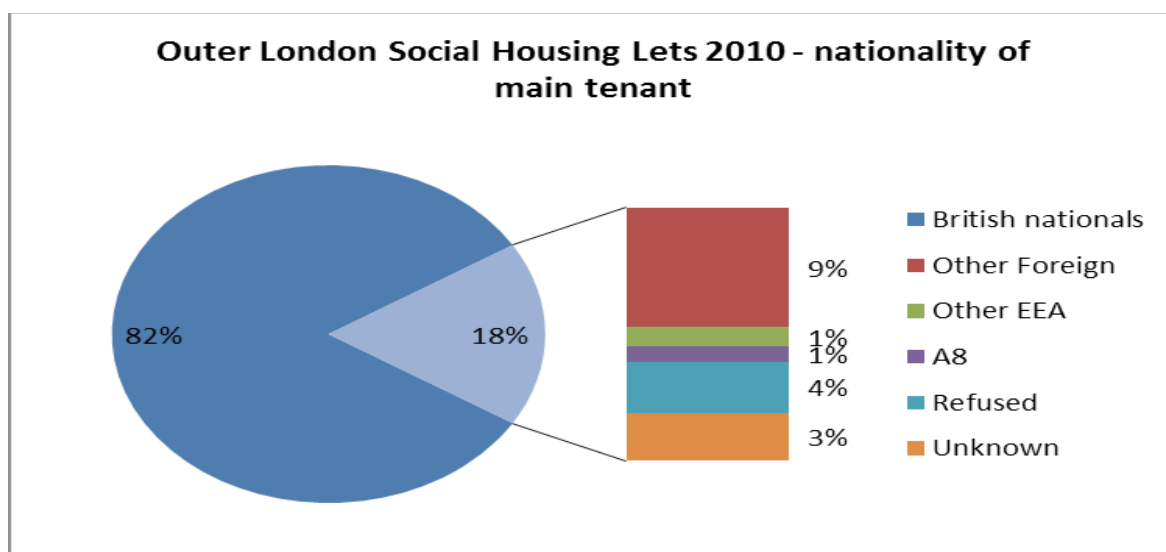


Figure 2: CORE data for Outer London Social Housing Lets by nationality



30 A higher proportion of social housing lets go to British nationals in outer London – 82% compared to 73% in inner London.

31 Inner London had a much higher rate of refusal to answer the question on nationality with 1,864 (13%) of compared to 434 lets (3.6%) in outer London. The refusal rate for the rest of England is 1.5%. The same questionnaire is used across the country.

32 Much greater variation appears when the data is examined at borough level (see Annex B) where there are large differences both in the numbers recorded as going to foreign nationals and in those who refused to answer.

33 Tables 2 and 3 below shows the percentage of social housing lets recorded in CORE that went to foreign nationals, the percentage where nationality was unknown and the percentage recorded as going to British nationals for Inner and Outer London.

Table 2: Social housing lets by Inner London Borough

Borough	% CORE lets to foreign nationals	% lets recorded in CORE with no nationality data	% lets recorded in CORE as going to British Nationals	% of total lets known to be allocated to British nationals
Haringey	43%	1%	56%	37%
Wandsworth	20%	1%	79%	79%
Ken & Chelsea	18%	4%	79%	-
Camden	14%	10%	76%	48%
Lambeth	11%	3%	86%	40%
Westminster	11%	18%	71%	-
Islington	10%	1%	89%	89%
Southwark	9%	35%	56%	52%
Hackney	8%	2%	90%	43%
Hammersmith & Fulham	7%	34%	58%	-
Newham	6%	1%	93%	37%
Tower Hamlets	6%	5%	89%	60%
Lewisham	6%	36%	58%	58%

Table 3: Social housing lets by Outer London Borough

Borough	% CORE lets to foreign nationals	% lets recorded in CORE with no nationality data	% lets recorded in CORE as going to British Nationals	% of total lets known to be allocated to British nationals
Ealing	45%	2%	52%	-
Richmond	18%	3%	79%	-
Merton	16%	13%	70%	70%
Hounslow	13%	2%	89%	-
Barnet	12%	1%	88%	-
Barking & Dagenham	11%	4%	86%	86%
Hillingdon	8%	3%	88%	-
Brent	8%	10%	82%	-
Redbridge	7%	0%	93%	-
Croydon	7%	3%	90%	49%
Waltham Forest	7%	2%	92%	-
Kingston upon Thames	6%	10%	84%	-
Greenwich	6%	2%	92%	40%
Harrow	5%	2%	92%	-
Havering	5%	2%	93%	-
Sutton	4%	19%	77%	-
Bromley	4%	1%	95%	-
Enfield	4%	48%	48%	-
Bexley	2%	1%	97%	-

34 Nearly half of all social housing lets in Ealing and Haringey in 2010 that were recorded in CORE went to foreign nationals.

35 There is great variation between the boroughs in the proportions of tenants recorded as either refusing to answer the question regarding their nationality or of the data being unknown.

36 Almost half the social housing lets in Enfield recorded by CORE had no nationality data. For Lewisham, Southwark and Hammersmith and Fulham over a third of lettings had no nationality data

37 It is noteworthy that those inner London boroughs that showed a relatively low proportion of lets to foreigners also had a very high proportion of tenants who refused to give their nationality (Lewisham, Hammersmith, Southwark).

38 When both those proportions were low, the percentage included in Core (Table 1) was also low (Newham 40%, Hackney 40%, Tower hamlets 68%).

39 As a result of these two factors, it is very hard to estimate the true proportion of new lets to foreign nationals. Put another way, the percentage of lets for which we can be reasonably sure that the tenants were British citizens can be as low as 37% (Haringey, Newham).

40 For example, Newham records 93% of social housing lets in CORE as going to British nationals. However, CORE only covers 40% of the lets made in Newham. Therefore the confirmed proportion of social housing lets that have been recorded as going to British nationals is 37%.

41 Lewisham has full coverage of its social housing lets in CORE and reports that 9% of its social housing lets went to foreign nationals. However 35% of these lets are marked as having refused to give their nationality. So the proportion confirmed as going to British nationals is 58%.

42 Lambeth records 86% of social housing lets in CORE as going to British nationals. However, CORE only covers 46% of the lets made in Lambeth. Therefore the confirmed proportion of social housing lets that have been recorded as going to British nationals is 40%.

43 This is not to suggest that the actual percentage of social housing going to British nationals is this percentage - just that this is the percentage that can be confirmed.

Other Data Sources

44 In addition to the CORE data there are additional potential sources of information on the nationality of new tenants. Each applicant for social housing has an application file opened on them by the housing provider. It will include interview notes about the applicant's circumstances and identification documentation (e.g. copy of passport) to confirm their eligibility. In addition most applicants will have filled out an application form that for many councils includes a specific question relating to nationality.

45 In boroughs where there were large gaps in the data Migration Watch UK submitted Freedom of Information Requests to try and discover the actual number of social housing lets going to foreign nationals and the number going to British nationals for the financial year 2010/11.

46 No borough was able to completely answer this question. The reasons given included:

- that the data was recorded but not collected so each individual form would have to be examined exceeding the time or cost limit.
- the question on the application form was optional so not many applicants had completed it
- the question on the application form is new and many applicants had answered a previous application form where it was not included.

47 These were interesting responses in themselves. It is curious that councils do not deem it important to collate and so report on the nationality of those allocated housing, surely a topic of acute interest to their ratepayers. It is curious also that some councils declined to reply claiming that the question in the application form on nationality is optional but an examination of the application form shows that there is nothing in the nationality question that suggests to

applicants that it is optional (see for example Kensington and Chelsea's application form¹³).

Conclusion

48 The official data shows that at least 11% of social housing tenancies were given to foreign nationals in 2010. Some boroughs have large unexplained gaps in their data due either to an usually high number of respondents refusing to divulge their nationality or due to a failure to record a large proportion of their lets in CORE.

49 A full enquiry should therefore be set in hand by the central government so as to gain a full picture of to the extent to which foreign nationals impact on social housing. Meanwhile, it should be made compulsory to record and report the nationality of all social housing lets.

50 Finally, given the scarcity of social housing a debate is urgently needed on entitlement to social housing.

5 April 2012

Annex A – CORE Lettings Log

The form is titled "CORE Lettings Log 2010/11" and is labeled "STRICTLY CONFIDENTIAL". It is divided into several main sections:

- LANDLORD/LETTINGS DETAILS:** Includes fields for housing association, letting in, and local authority.
- FOR GENERAL NEEDS HOUSING ONLY:** Asks who is the landlord on the tenancy agreement.
- FOR SUPPORTED HOUSING ONLY:** Includes management group and scheme code.
- TENANCY DETAILS:** Covers type of tenancy, secure status, and start/end dates.
- HOUSEHOLD CHARACTERISTICS:** A table for listing household members with fields for age, sex, relationship, economic status, and occupation.
- ETHNIC GROUP:** Section for defining the ethnic group of the person.
- RENT AND OTHER CHARGES:** Section for recording rent, council tax, and other charges.
- REASON FOR VACANCY:** Section for recording the reason the property was vacant.
- PROPERTY DETAILS:** Section for recording property type, number of bedrooms, and other features.
- RENTAL AND OTHER CHARGES:** Section for recording rent, council tax, and other charges.
- REASON FOR VACANCY:** Section for recording the reason the property was vacant.
- PROPERTY DETAILS:** Section for recording property type, number of bedrooms, and other features.

ANNEX B - CORE letting data on nationality by borough for 2010/11

Borough	Other Foreign	Other EEA	A8	A2	British Nationals	Refused	Unknown	TOTAL
Camden	73	32	4	0	600	30	46	785
Hammersmith & Fulham	41	18	9	1	545	20	298	932
Islington	22	6	116	2	1312	12	1	1471
Ken & Chelsea	59	38	3	1	453	13	8	575
Lambeth	72	43	6	0	907	25	6	1059
Lewisham	57	35	19	0	1068	631	23	1833
Southwark	171	53	10	1	1448	887	4	2574
Tower Hamlets	48	22	20	3	1320	30	40	1483
Wandsworth	144	33	19	2	799	7	4	1008
Westminster	70	44	11	0	787	193	8	1113
Haringey	235	8	0	0	314	7	1	565
Newham	19	6	5	0	444	3	1	478
Hackney	44	14	11	1	751	6	12	839
Greenwich	32	10	5	0	747	18	2	814
Barking & Dagenham	89	17	18	2	1025	19	23	1193
Barnet	57	15	7	1	600	4	0	684
Bexley	10	4	7	0	861	3	3	888
Brent	47	15	5	0	672	76	9	824
Bromley	22	8	4	0	807	6	2	849
Croydon	32	4	4	1	531	15	5	592
Ealing	461	4	10	0	547	11	11	1044
Enfield	16	8	7	0	387	226	164	808
Harrow	13	3	3	1	350	5	4	379
Havering	15	8	6	2	553	2	11	597
Hillingdon	39	22	12	0	760	24	5	862
Hounslow	37	14	10	0	396	2	7	466
Kingston upon Thames	7	2	0	0	117	4	10	140
Merton	54	6	11	0	303	10	47	431
Redbridge	16	8	2	0	340	1	0	367
Richmond	58	6	1	0	289	4	8	366
Sutton	9	4	9	0	423	5	98	548
Waltham Forest	16	5	9	0	424	4	3	461
TOTAL	2085	515	363	18	20880	2303	864	27028
TOTAL INNER LONDON	1055	352	233	11	10748	1864	452	14715
TOTAL OUTER LONDON	1030	163	130	7	10132	439	412	12313