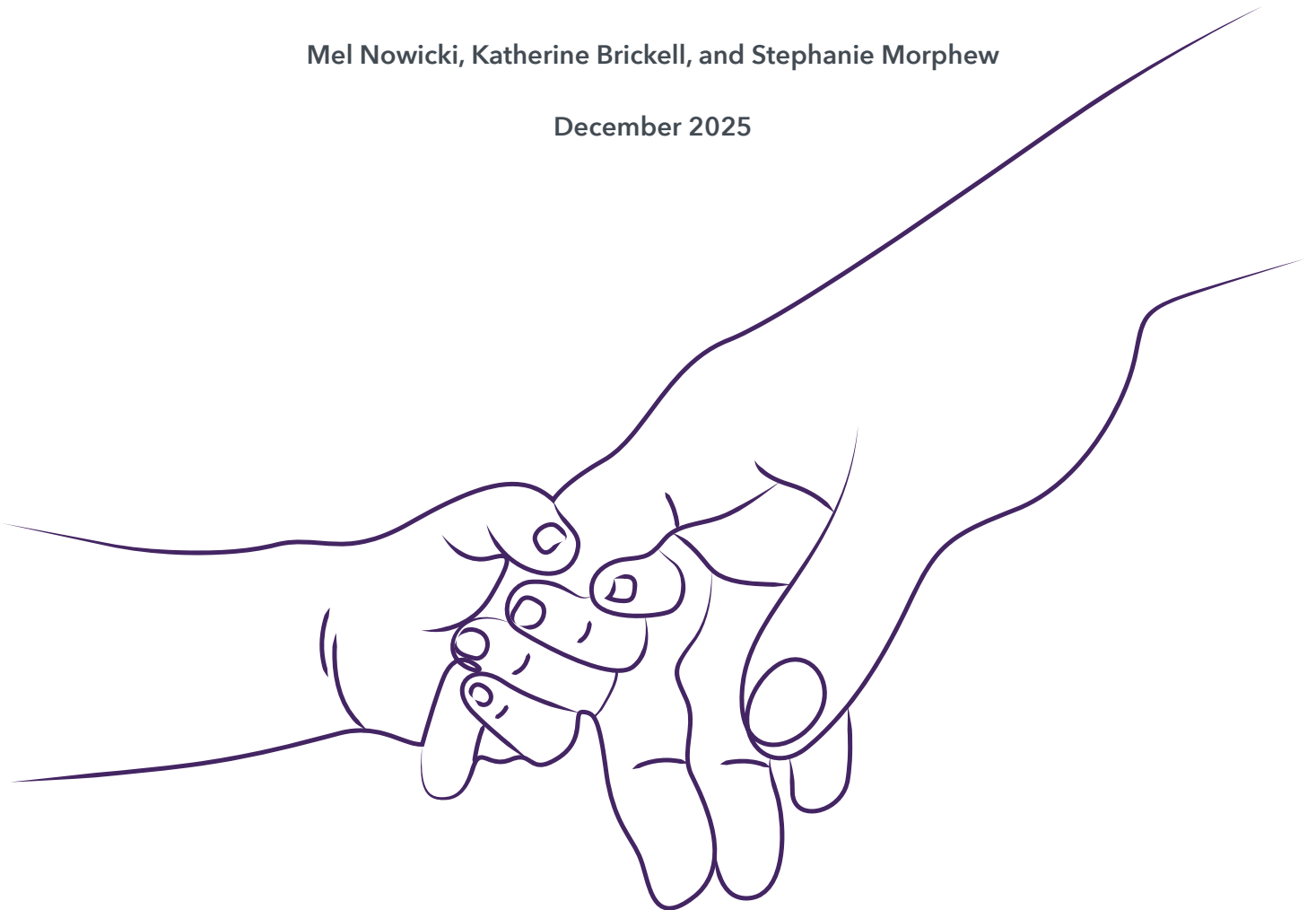


'YOU CAN'T BID BECAUSE YOU'RE IN THE RED':

HOW ALLOCATION POLICIES CAN AFFECT DOMESTIC ABUSE SURVIVORS WITH HOUSING-RELATED DEBT – RESOLVING THE ISSUE

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About the project

The Chartered Institute of Housing (CIH), King's College London and Oxford Brookes University have come together to co-badge this report, with the shared aim of improving housing provider responses to survivors of domestic abuse. It is based in part on research conducted across 2022-2024 by two of the report's authors, Katherine Brickell and Mel Nowicki, which:

- a) Repeat interviewed 13 clients of the Shared Health Foundation over several years about their experiences of domestic abuse, debt and temporary accommodation, and the intersections between them. (Shared Health Foundation is a health equality charity based in Greater Manchester.)
- b) Collated and analysed all English local authority allocation policies in relation to their housing-debt rules, and
- c) Used FOI requests to all English local authorities to ascertain the number of households trapped in temporary as a consequence of these rules for a one-month period (December 2023).

This report builds upon that research with analysis of 20 housing association allocation and domestic abuse policies, collected by CIH as part of the Make a Stand campaign, interviews with five housing providers who have embedded various elements of best practice into their policies, working with Nick Bano at Garden Court Chambers to develop legal best practice, and analysis and collation of relevant policy reports, government statistics and data.

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Executive Summary

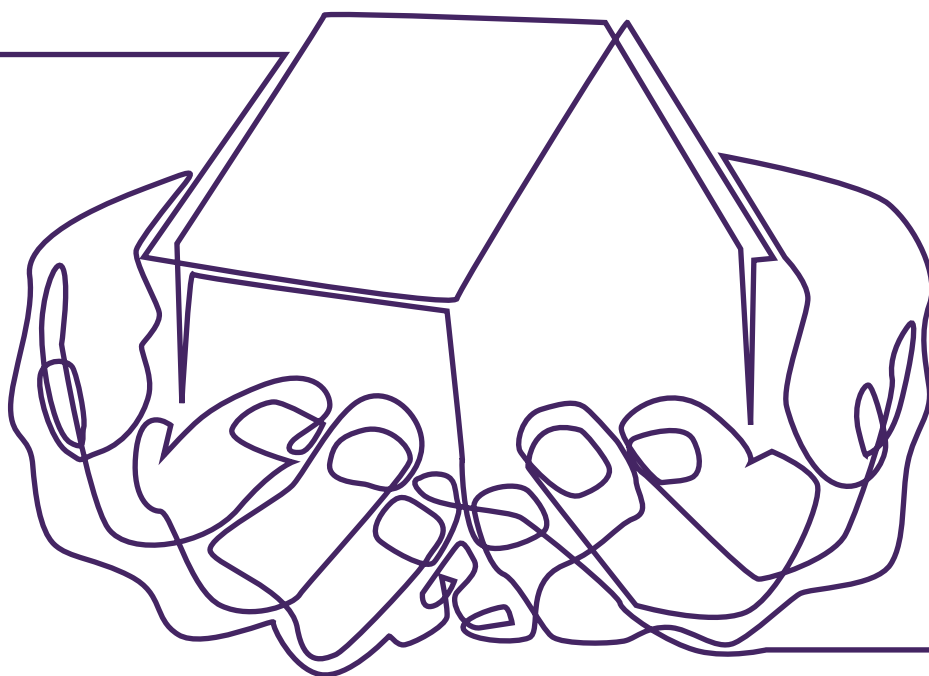
The progress made by the housing sector, local authorities and consecutive governments to understand, prevent and tackle domestic abuse has increased in recent years. This is in no small part to the relentless campaigning by organisations working with survivors and housing providers. The Domestic Abuse Act 2021ⁱⁱ, the Social Housing (Regulation) Act 2023ⁱⁱⁱ, and the removal of local connection rules for survivors of domestic abuse in 2025^{iv} all represent significant steps to limit the harms of domestic abuse and strengthen the responses of housing providers. To build upon this momentum, more can and needs to be done.

This report outlines where housing related debt rules included in allocations policies act to limit a survivor's ability to find a safe home. Economic coercion and control are major components of domestic abuse, and the costs of fleeing a perpetrator can leave a survivor struggling financially and facing homelessness. Debts accrued as a consequence of their abuse can then leave survivors, including children, trapped in temporary accommodation, unable to bid for social housing until arrears and other forms of debt are cleared.

Through prevention strategies, revisiting allocation policies, and supporting holistic thinking, this report highlights a range of strategies that housing providers do and can employ to ensure the strongest possible support is in place for survivors of domestic abuse who are at risk of or experiencing homelessness.

We know that domestic abuse can happen to anybody, and that the residents and service users local authorities and housing associations encounter will represent a breadth of background and experiences. However, it is important to acknowledge that domestic abuse is a gendered crime. According to the latest government data for England and Wales, approximately 6.6 per cent of women (1.6 million) experienced domestic abuse in the year ending March 2024, compared with approximately three per cent of men (712,000). In the same year, the victim was female in 72.5 per cent of domestic abuse-related crimes, and in 65.4 per cent of domestic homicides (compared with 12.3 per cent of non-domestic homicides)^v. These numbers demonstrate why it is vital that all victims of domestic abuse are supported to access a safe place to call home.

There are no silver bullets here, but rather a series of suggestions and opportunities to make incremental, but highly significant, improvements to support all survivors of domestic abuse at risk of or experiencing homelessness.



Introduction

In England today, survivors of domestic abuse are finding accessing secure, safe and affordable housing an increasing struggle. There are many systemic reasons for this, but social housing providers' allocation policies – particularly their rules disqualifying households in rent arrears – are contributing to that struggle and inadvertently acting as a barrier to social housing. The outcome of this is thousands of families – many of whom have suffered domestic abuse – left trapped in temporary accommodation.

The purpose of this report is to both spotlight this increasingly prescient issue and, crucially, to provide guidance for social housing providers looking to improve their support for domestic abuse survivors at risk of or experiencing homelessness.

Allocation policies and temporary accommodation: contextualising the issue

In 2019, CIH published the Rethinking Allocations report, which outlined the impact of social housing rationing processes within housing provider allocation policies, due to a lack of supply. The report noted that:

“The policy pressures on the sector are significant and while these pressures remain, strict rationing behaviour will persist, and so will the related issues.”

In the six years since the report's publication, these policy, societal and economic pressures on social housing providers have only increased. Private rents continue to rise – as of October 2025 average monthly rent in England was £1416^{vi} – and the end of a private assured shorthold tenancy (AST) remains the main reason for homelessness for households owed a prevention duty. Alongside this, the numbers of households in temporary accommodation continues to rise. Latest government figures show that 132,410 households are living in temporary accommodation, a 7.6 per cent rise from the previous year. 63.6 per cent of those households include dependent children – there are now more than 172,000 children living in temporary accommodation.^{vii} The most recent data from the Homelessness Monitor England highlights that homelessness continues to be a growing problem. In 2024, 330,000 households were assessed by local authorities to be homeless or at risk, up four per cent year on year, and 21 per cent over three years.^{viii}

These growing numbers are all contributing factors to rising pressures on providers as increasing numbers of people are at risk of or experiencing homelessness and in need of social housing. The most recent government data states that as of 2024 there are 1.33 million households on local authority housing registers (commonly known as waiting lists) – the highest since 2014.^{xi} These figures only tell part of the story, as they do not account for those excluded or disqualified from accessing these registers who are in need of a secure, affordable home.

Whilst households applying for affordable and social lets are at their highest for a decade, what can be seen in this highly pressurised landscape is that there are reduced numbers of households being placed in social housing directly from temporary accommodation. According to statistics from the Ministry of Housing, Communities and Local Government (MHCLG), households being placed directly from temporary accommodation accounted for 14 per cent of new affordable and social lets in 2023/24 (down from 15 per cent in 2022/23). This equates to around 30 per cent of households in temporary accommodation in 2023/24^x. It is worth noting that total the lettings to statutorily homeless households in settings other than temporary accommodation was 27 per cent.

These figures raise questions about the efficiency of current housing allocation policies in supporting those most in need of housing, given that only 14 per cent of new social lets are allocated to those moving from temporary accommodation. It is important to note that social housing providers will have many competing priorities for who need access to their homes, beyond those in local temporary accommodation. These include those needing to be moved due to poor conditions, to tackle overcrowding, to manage regeneration projects, and, more broadly, due to a lack of suitable homes for households in temporary accommodation, especially larger families in in-demand areas^{xi}.

As outlined above, there are multiple reasons for the gap between the numbers of households in temporary accommodation and the number being allocated social housing. However, an important contributing factor, and the reason for this report, are widespread allocation rules that disqualify households in housing-related debt from accessing social housing.

Housing-related debt most commonly refers to existing, or historical rent arrears from a former tenancy. However, dependent on the housing provider, housing-related debt can include other forms of debt such as council tax arrears.^{xii} According to government statistics, between April and June 2025 1,750 households in England were owed a prevention duty due to the end of an AST brought about by rent arrears. Allocation rules that disqualify or deprioritise households in housing-related debt can therefore create something of a paradox, where for many households the cause of their homelessness traps them in temporary accommodation for extended periods of time.

In 2023-24, two of this report's authors, Katherine Brickell and Mel Nowicki, conducted a research project – entitled The Debt Trap^{xiii} – which explored the intersections of debt, domestic abuse and family homelessness. The project included analysis of all 294 social housing allocation policies in England (excluding county councils), and submitted Freedom of Information (FOI) requests to all English local authorities to ascertain how many households in temporary accommodation in a single month (December 2023) were ineligible for social housing due to rent arrears. The research found that the majority of local authorities in England include housing-related debt rules in their housing allocation policies.^{xiv}

Key findings of the research were:

- 88 per cent of local authorities have a disqualification policy due to housing related debt
- Over half (54 per cent) have a de-prioritisation policy, linked to housing-related debt
- Often local authorities have both a disqualification and de-prioritisation policy, dependant on the amount of debt a household is in
- And 70 per cent of local authorities have a linked 'intent to pay' policy, which usually mandate consecutive payments before eligibility is reinstated.^{xv}

Related research conducted in 2025 by Crisis, Heriot Watt University and the UK Collaborative Centre for Housing Evidence has revealed that seven in ten (71 per cent) of housing associations surveyed always or sometimes excluded applicants with rent arrears.^{xvi}

In this report, there is particular concern for the impact these rules are having on domestic abuse survivors, who are exempted from such rules in less than one in five (17 per cent) of local authority allocation policies.^{xvii}

Allocations and domestic abuse in the devolved nations

At present, across each of the four nations of the United Kingdom, a housing authority must give a reasonable preference in their allocations scheme to people who are homeless - Housing Act 1996, section 166A(3)(a), 167(2)(a)^{xxviii}; Housing (Scotland) Act 1987, section 20(1ZA)(a)^{xix} and the Northern Ireland Housing Executive's Housing Selection Scheme Rules, rules 15 and 24^{xx}. But, in other elements in their homelessness policies, the nations diverge.

In **Scotland**, there is no concept of 'priority need' in relation to homelessness, this means anyone who is unintentionally homeless is entitled to settled accommodation. In this context, domestic abuse is treated as a ground for being homeless or threatened with homelessness, rather than as a special priority category. There is a 'reasonable preference' category of "people who are living under unsatisfactory housing conditions and who have unmet housing needs".^{xxi} Local authorities must set out in their allocation policies what they consider to be 'unsatisfactory housing conditions', and this may include survivors of domestic abuse. In September 2025, the Scottish Parliament voted to pass the Housing (Scotland) Bill. Part 5 of this legislation requires social landlords to have a policy which sets out how they will support tenants who are at risk of homelessness due to domestic abuse.^{xxii}

In **Wales**, the allocation of accommodation and homelessness guidance^{xxiii} states that survivors of domestic abuse may be included as an 'additional preference' category on social housing waiting lists. In Wales, a victim of domestic abuse will automatically be classed as priority need. If they are then found to be unintentionally homeless, they will be owed the statutory homelessness duty and the local authority will have a duty to provide the household with a home. This is the case even if the household is found guilty of unacceptable behaviour, making them unsuitable to be a tenant. Regardless, the local authority has the duty to find them a home. The forthcoming Homelessness and Social Housing Allocation (Wales) Bill will widen the definition of domestic abuse to explicitly include coercive control, economic and psychological abuse. The Bill will also abolish priority need and intentional homelessness.^{xxiv}

The national allocations guidance for both Wales and Scotland also include the requirement for local authorities to provide support for people who are in financial hardship and who have debts.

In **Northern Ireland**, recent changes to allocation policies have included more recognition for domestic abuse survivors. The Housing Selection Service (HSS) operates a common points-based waiting list, providing a single route into social housing across the country. The system used to distinguish between 'intimidation', a category based on sectarian division in Northern Ireland, and other forms of violence and abuse, where cases of 'intimidation' were assessed differently and awarded more priority points. However, in April 2025, intimidation points were formally abolished, meaning all victims of violence, including domestic abuse, are assessed under the same criteria.^{xxv}

Domestic abuse and debt

Domestic abuse, homelessness, and household debt are intrinsically linked. Latest government statistics for England show that domestic abuse is the second most common reason for a homelessness relief duty to be owed by a local authority – accounting for 16.5 per cent of households.^{xxvi} This includes some councils reporting significant (28 per cent^{xxvii}) rises in the number of households in need of temporary accommodation due to domestic abuse. However, considering the under reporting of domestic abuse^{xxviii} and the stigma some survivors believe they could face if they disclose, it is likely that the numbers are much higher.

Debt plays a key role in this relationship – both as a cause of homelessness, and as a mechanism that keeps families, including domestic abuse survivors, trapped in temporary accommodation. In a survey conducted by Women's Aid, 43 per cent of respondents reported they were in debt because of domestic abuse^{xxix} and research by Refuge and the Co-operative Bank, published in 2020, found that the survivors of economic abuse they surveyed were burdened with an average of £3,272 of debt^{xxx}.

Once in debt, most will find it difficult to manage without specialist advice; let alone whilst fleeing abuse, navigating the homelessness system, bearing the heightened cost of homelessness, and bringing up children. Debt does not stop in a crisis, it accelerates^{xxxi}.

Box 1: Defining economic abuse

Surviving Economic Abuse has found that one in six women in the UK has experienced economic abuse from a current or former partner, and almost all (95 per cent) domestic abuse survivors have experienced economic abuse, with 60 per cent experiencing coerced debt as a result.^{xxxii}

Household finances and debt have long been a pervasive tool for perpetrators of domestic abuse to control and coerce their victims. In a legal first, the Domestic Abuse Act (2021) for England and Wales, recognised and defined economic abuse. The Act defines economic abuse as any behaviour that has a substantial and adverse effect on an individual's ability to:

- Acquire, use or maintain money or other property (such as a mobile phone or car), or
- Obtain goods (such as food and clothing) or services (such as utilities, like heating)

Whilst the Act does not make economic abuse a crime in its own right, it is an important mechanism for ensuring better awareness of economic abuse among police, local authorities and other statutory agencies.^{xxxii xxxiv}

How debt shapes survivors' experiences of homelessness

- Rent arrears and other housing-related debts can be accrued as a consequence of economic abuse. This can be directly through perpetrators not paying rent, or lying about paying rent, or indirectly through controlling the survivors' access to money, meaning they are unable to afford rent.
- The cost of fleeing a perpetrator, especially if economic abuse has been a factor. Arrears can occur from the act of fleeing and leaving behind a tenancy in a survivor's name or where a perpetrator refuses to or lies about contributing to rent payment. Rent arrears can then be compounded by moving into poor condition expensive private rental housing after fleeing. The research by Brickell and Nowicki shows that debts can accrue through survivors having to pay for the costs of cleaning and repair themselves when landlords refuse to do so, and/or through survivors withholding rent payments in protest of landlord's refusal to agree to basic upkeep and maintenance of their property.^{xxxv}
- If placed in temporary accommodation, survivors can incur further debts from the particularly high cost of living. These can include increased costs of home-to-school travel as families are placed far from schools and support networks, costs of being placed in a kitchen-less accommodation (e.g. hotel rooms) and having to rely on processed and takeaway food, costs of laundrettes, costs of storing belongings, and costs of moving at short notice.
- Allocation policies can exclude or deprioritise households in rent arrears and other housing-related debt from allocation lists to access more secure, affordable housing.^{xxxvi}



What can be done?

The trap of prolonging homelessness because of one's debt, which, in turn, incurs more debt, is cruel and inefficient - it does not have to be this way. The following sections outline how housing providers can better support domestic abuse survivors at risk of or experiencing homelessness. Through outlining opportunities for prevention activity, amended allocation rules and holistic approaches, and highlighting particular providers who are demonstrating best practice, this report contributes to improving integrated thinking on domestic abuse, housing and homelessness.

1. Prevention

Debt support from housing providers and other related services has traditionally focused on money management advice. However, it has become increasingly clear that stronger interventions are needed to support domestic abuse survivors who are struggling with debt and at risk of or experiencing homelessness. This is reflected in both the legal recognition of economic abuse since 2021, but also the growing unaffordability of housing and wider cost of living concerns.^{xxxvii}

Increased household economic stress and rises in homelessness have been ongoing trends since the austerity measures of the 2010s, and becoming acute in the 2020s as homelessness rates and the cost of living have risen sharply.^{xxxviii} In short, providing survivors who are homeless or at risk of homelessness with debt advice does not go far enough in terms of homelessness prevention or reducing time spent in temporary accommodation. Debt clearance should become a more commonplace and more widely acknowledged tool for housing providers to minimise homelessness.

While debt clearance is not currently commonplace, there has been some shift in how housing providers contextualise rent arrears and other forms of housing-related debt. A 2025 Crisis report on allocations surveyed housing associations regarding their allocation policies and showed a significant fall (23 per cent) in housing associations 'always' excluding an applicant in debt from their registers due to housing-related debt as long as they could demonstrate a payment plan. However, even with a payment plan in place, 37 per cent still 'sometimes' excluded those in housing-related debt.^{xxxix}

There is also a growing body of evidence that homelessness prevention through arrears and other debt clearance is a financially, as well as morally, and logical means of supporting those at risk of homelessness. Government statistics from April-June 2025 on statutory homelessness in England show that increased prevention activity - including through clearance or reduction of rent arrears - has enabled more households to remain in their existing home, avoiding entry into temporary accommodation:

"...negotiation work to allow the household to remain in their existing accommodation, or help with financial payments to reduce arrears, resulted in 6,570 households being able to remain in their existing home. This is 34.5 per cent of those securing accommodation for six or more months."^{xl}

Given that local authority spend on temporary accommodation reached £2.8 billion per year in 2024-25 - an increase of 25 per cent in one year^{xli} - a number of local authorities are increasingly choosing to prioritise prevention activity to tackle homelessness. Some are doing so by covering rental arrear costs through Discretionary Housing Payments (DHP) and the Homelessness Prevention Grant, whilst others outline these exemptions explicitly in their domestic abuse policies.

For example, Redbridge Council consider DHP awards for survivors who have fled domestic abuse, and those in rent arrears^{xlii}, and Harrow Council's Domestic Abuse Policy states that:

"Consideration should be given to the circumstances in which the arrears accrued, and it may be necessary to consider former arrears for write-off."^{xliii}

The policies of these local authorities are clear examples of moving beyond categorising arrears solely as evidence of unsustainable tenancy behaviour, and towards a more person-centred approach to rent arrears and other forms of debt. In their analysis, two of this report's authors identified commonplace language across many allocation policies equating rent arrears with anti-social behaviour. The analysis identified a postcode lottery in regard to how housing-related debt is managed. For example, some allocation policies exclude households from bidding on the basis of arrears of as little as £250.^{xliv} These amounts are a fraction of the costs of housing a family in temporary accommodation for what have become increasingly extended periods of time. Housing providers could view these low-level arrears more strategically, and update their allocation policies to reflect this. This could enable local authorities to avoid paying higher temporary accommodation costs and instead divert money to safe and stable homes.

Box 2: Joined-up prevention strategies: Calderdale Council and Together Housing

Calderdale Council have developed a multi-step pathway of debt support for domestic abuse survivors that includes covering debt and rental payments through their allocation of the Homelessness Prevention Grant and Discretionary Housing Payments.

Crucially, Calderdale Council work closely with Together Housing, their main housing provider, to ascertain the needs of each individual household. Information sharing between the council's housing options team and Together Housing is regular - with monthly meetings in place to discuss high risk cases. Domestic abuse and debt support is also built in from the outset of a referral through specialist roles that are incorporated into the council's housing options team. These include a domestic abuse advisor and money advice specialists.

Although this approach is time-consuming, from Calderdale Council's perspective, it shows clear cost benefits. As Heidi Waters, lead for housing and climate change at Calderdale Council, noted:

"...yes it is time intensive. But you tell me, how much does it cost to have a family sitting in temporary accommodation, a bed and breakfast, and the costs of that compared to the cost of a conversation?"

The Calderdale Council and Together Housing teams have also embedded domestic abuse identification and support into their joint approach to housing allocation and policy. For example, for the last 10-15 years, Together Housing have trained their operative staff to look for signs of domestic abuse. They have found this to be a key way of identifying signs of domestic abuse that may be concealed from housing officers due to abusers being more likely to hide concerning behaviours during their visits.

In short, the time spent on a partnership approach and consistent communication between the local authority and housing provider pays both social and financial dividends. It is crucial to review each case individually and ensure survivors are identified and supported to stay in their homes, when it is safe to do so, before the point of homelessness is reached.

2. A return to rethinking allocations: exempting domestic abuse survivors from housing-related debt rules

One of the key barriers faced by families experiencing homelessness and living in temporary accommodation are the debts accrued before they became homeless. If it is not possible to apply the prevention strategies outlined in the previous section, then housing-related debt can trap families in temporary accommodation for extended periods of time. Unfortunately, allocation policies are playing a significant, yet still under scrutinised, role in this.

Tenancy sustainability is a key aspect of social housing allocation, and historical housing-related debt, such as rent arrears, can be an indicator of potential future tenancy issues. However, allocation policies that include blanket suspension of those in housing-related debt risk vastly limiting access to social housing for some of society's most vulnerable. For this reason, the relationship between allocations policies and rent arrears requires a review.

As CIH's *Rethinking Allocations* report highlighted, rationing processes within allocation policies are a concern when they have the potential to exclude those most in need of social housing^{xlv}:

“Ensuring tenancies are sustainable is... important, but activity to help achieve this is undermining efforts to house those who need homes the most”

Since the report's publication, this has worsened in a context of an ongoing cost-of-living crisis and rising homelessness. This is especially pertinent for domestic abuse survivors, potentially thousands of whom being excluded from applying for social housing due to debts that may have been accumulated through economic abuse. This is tantamount to having 'survived then [been] punished' - as a participant in the Debt Trap project described.^{xlvi}

This project found that, in December 2023 alone, nearly 4,000 households living in temporary accommodation were ineligible to apply for social housing due to rent arrears - 43 per cent of these households included at least one dependent child.^{xlvii} This equates to over 1,500 children being trapped in temporary accommodation by housing-related debt rules in just one month. Almost all (94 per cent) of local authorities mention domestic abuse in their allocations policy, but currently less than one in five (17 per cent) specifically state that they exempt survivors from housing-related debt rules.^{xlviii}

In the same research project, all local authority allocation policies in England were analysed. Findings showed inconsistency in relation to rules on rent arrears and other forms of housing debt, with some policies far more flexible in their approach than others.



Through analysis of the policies, six areas for improvement were identified:

- 1. Remove stigmatising language relating to indebted applicants.** This can be achieved through removing the inclusion of rental arrears in descriptions of anti-social behaviour. Conflation of rental arrears with anti-social behaviour can be problematic, especially in the context of domestic abuse survivors, who, through this type of language, can find themselves in some examples being referenced under the same bracket of anti-social behaviour as their perpetrators.
- 2. Reducing the range of debts covered,** e.g. removing exclusion and de-prioritisation triggered by debts other than rental arrears such as council tax and utility arrears.
- 3. Removing the inclusion of debts from other housing providers,** including private landlords.
- 4. Removing the inclusion of debts caused by the culpability of others.** Again, this is especially problematic in relation to survivors, who, under these rules, may find themselves trapped in temporary accommodation as a direct consequence of debts accrued by their perpetrator.
- 5. Ensure 'intent to pay' rules are achievable, proportionate and supported.** Currently some allocation policies require a payment plan of more than six months before allocation eligibility can be re-instated, even for very small total debts (in some cases as low as £250).
- 6. Ensure exemption and discretion are embedded within policies.** The benefits of this approach have been outlined above in the Calderdale Council case study in Box 2. Broad outcomes can be achieved by considering each applicant's unique housing history.

The role of housing associations

Even where local authorities do exempt domestic abuse survivors from allocation rules relating to rent arrears, the housing provider, if different to the local authority, might not. Having been accepted onto a local authority allocation list, survivors can find they are then ineligible to join the housing provider list on the grounds of the same rent arrears. This amounts to something of a 'double jeopardy', whereby survivors may manage to pass through one door, only to find the next one locked.

Considering the discrepancies that can appear between local authority and housing association allocation policies, for the purposes of this report we conducted further research that collated a sample of housing association allocation and domestic abuse policies. The policies of 20 housing associations were reviewed in total. The sample is relatively small in comparison to the local authority data conducted as part of the Debt Trap project, but includes some of the larger housing providers in England and represents approximately 355,350 homes in England.

Although all housing associations allocation policies reviewed had a domestic abuse policy, only four had an exemption policy for survivors in housing-related debt. Language tended to be vague or heavily caveated, for example stating that an applicant 'may' be eligible for an offer of accommodation if debts accrued are a consequence of domestic abuse, if the total does not exceed a certain amount (usually around £1,000). Especially vague policies refer to applications that may be considered if there is evidence of harassment (rather than explicit mention of domestic abuse).

A policy for survivors

To address the rationing of social homes to survivors of domestic abuse in housing related debt and the harm that it causes outlined above, allocation policies need to clearly take into account survivors' experiences and needs. Housing providers exhibiting best practice are those that explicitly support domestic abuse survivors in the allocation process, alongside ensuring housing providers are meeting equality standards and their duties under the consumer standards. The Social Housing (Regulation) Act 2023^{xlix} introduced new rules as part of the consumer standards where housing providers must:

- Have a policy for how they respond to cases of domestic abuse. (Section 193 of the Housing and Regeneration Act 2008, as amended by the Social Housing (Regulation) Act 2023)ⁱ.
- Co-operate with appropriate departments to support the local authority in meeting its duty to develop a strategy and commission services for survivors of domestic abuse and their children within safe accommodation. This expectation is laid out by the Regulator of Social Housing in the Neighbourhood and Community Standard 2.3.2.ⁱⁱ

Exempting domestic abuse survivors from housing-debt related to are a clear demonstration of consumer standards duties. However, to ensure best practice and full compliance, housing providers should be coupling exemption with pro-active support measures for domestic abuse survivors struggling with debt – with particular emphasis on households at risk of or experiencing homelessness.

This can begin with ensuring housing teams are engaging in professional curiosity in terms of establishing the root causes of debt. This includes working with tenants in housing-related debt to sensitively ascertain whether economic abuse has been a factor. Surviving Economic Abuse have developed a robust conversation starter kit that suggests numerous themes to encourage potential survivors to recognise and disclose economic abuse, including how to enable clients to understand how households finances can be used to control them.ⁱⁱⁱ This then should be paired with allocation policies that are explicitly recognising and protecting domestic abuse survivors at risk of or experiencing homelessness.



Establishing legal best practice

Another key motivation for exempting domestic abuse survivors from housing-related debt rules is to ensure that housing providers have regard to their duties under equality law. The 2012 statutory guidance on the allocation of accommodation advises local authorities to consider the impact of exclusion criteria on certain groups – including people fleeing domestic abuse and people who are homeless. Local authorities are advised to “make explicit provision for dealing with exceptional cases within their qualification rules” (paragraph 3.25).^{liii}

Existing case law, referred to in a 2016 Local Government Ombudsman’s report, confirmed that allocation schemes cannot, without good reason, disqualify groups of people who would be entitled to reasonable preference. Crucially, it found that having discretion to exempt applicants from criteria in exceptional cases cannot justify a policy if individual circumstances are not even considered. The Ombudsman reported:

“Take the view that, whether or not a council has included an exceptional circumstances provision in its policy, if an applicant’s exceptional circumstances have not been considered, we are likely to find it to be at fault”^{liv}

It is encouraging that some housing providers are adhering closely to guidance and explicitly recognising domestic abuse and its intersections with debt in their allocation policies. However, to be comprehensive, providers should ensure that survivors of domestic abuse are exempted from housing-related debt rules as a blanket policy.

A focus on exempting survivors where their arrears and other housing-related debts have accrued as a direct result of domestic abuse is difficult to evidence, and risks missing more complex cases where economic abuse might not be immediately obvious. As per Chapter 21 of the Homelessness Code of Guidance^{lv}, the burden of proof of abuse should not sit with the survivor. Abuse can be difficult to evidence, and prioritising evidence beyond the survivor’s account can be re-traumatising.

As such, housing providers that fully exempt domestic abuse survivors from housing-related debt rules are the most watertight in ensuring their allocation policies are supporting all domestic abuse survivors. Without the inclusion of full exemption, housing providers run the risk of discrimination on the basis of sex, which breaches the Equality Act 2010. This is because domestic abuse remains a highly gendered issue as outlined in the executive summary.

We are therefore recommending the following as an addition to housing provider allocation policies:

“[Name of housing provider] is committed to ensuring that survivors of domestic abuse are not unfairly prejudiced under this allocations scheme. When applying [Refer to rules concerning qualification and priority that related to debt], [name of housing provider] will not have regard to any debts that have arisen in consequence of domestic abuse”^{lvi}

Existing best practice

Below are examples of housing providers whose allocation policies are most explicit in their language when it comes to exempting domestic abuse survivors from rules on rental arrears. They clearly outline in their policies that arrears will not be considered where they have been accrued as a consequence of domestic abuse.

| Example 1 | Example 2 | Example 3 |
|---|--|--|
| A blanket policy will not be operated in relation to housing debt and each case will be considered on its own merits... Where a housing related debt has arisen as a direct result of a person being a victim of domestic abuse the debt will be disregarded for the purposes of assessing the application. | Any debt accrued as a result of experiencing domestic abuse or violence would be noted and considered, however would not prevent any offer of suitable accommodation to ensure the safety and wellbeing of the individual/household. | Each case will be considered on its own merit. For example, an application would not be suspended if rent arrears arose as a result of domestic abuse. |

Box 3: Example 3 in depth

The Homeseeker Plus partnership, has a shared policy for seven local authority areas across Gloucestershire and West Oxfordshire. Their domestic abuse clause has been in place for over twelve years, and, according to Thomas See, the Homeseeker Plus Lead for Cotswold, Forest of Dean and West Oxfordshire District Councils, is a key mechanism for supporting survivors. He highlighted that in practice, the exemption policy encourages housing officers to work to understand how arrears have come about, and make a clear plan for how they will be addressed. He noted that:

“If we’re letting people on [the allocation list], we’re letting them on with a plan at the other end.”

For the Homeseeker Plus team, the exemption is part of a wider strategy to minimise homelessness and reduce the length of stays in temporary accommodation wherever possible. In this spirit, See also highlighted how his team are currently looking to update and improve both their data and policies on domestic abuse in order to further strengthen their support for survivors. This highlights the importance of ensuring that allocation policies are not placed in a vacuum, but are part of a wider package of support.

Further to this, John Bryant, Head of Housing at Tewkesbury Borough Council, one of the members of the HomeSeeker Plus partnership, has also found the allocation policy to have had good results in terms of encouraging housing providers to accept households they would likely have refused prior to the amendment. He reflected that:

“We were finding housing providers being inflexible with their approach and refusing applicants with debt, sometimes historic debt, so we wanted to specifically highlight that when we reviewed our policy. This has opened conversations and enabled us to help providers question their own practices. We have worked with local domestic abuse support to build a picture of the situation when we have sought to challenge a decision not to offer.”

3. Shifting the culture: thinking holistically across survivors' housing journeys

Ensuring allocation policies do not discriminate against survivors is key to unlocking social housing access. However, it is not a stand-alone solution and should sit alongside a wider culture shift among housing providers and other key services to consider domestic abuse survivors' experiences of homelessness and debt more holistically. Full housing support for survivors at risk of or experiencing homelessness cannot be provided without embedding a survivor-led approach: recognising individual circumstances, housing journeys and needs.

Standing Together Against Domestic Abuse (STADA) and The Domestic Abuse Housing Alliance (DAHA), the leading specialist domestic abuse organisation working with housing providers to improve their support for survivors, have championed a Whole Housing Approach (WHA) since 2018. Core aims of the approach are:

- To improve identification and intervention practices across housing tenures;
- Reduce the number of people made homeless as a result of domestic abuse through widening housing options for survivors;
- Increase tenancy sustainment options so that survivors can be supported in either remaining in their homes or finding more appropriate accommodation, dependent on the circumstances of each individual.^{lvii}

Although the aims of the WHA are to consider survivor housing needs across all tenures, homelessness prevention and supporting survivors in temporary accommodation is a key facet, and a specialised section on temporary accommodation has been added to the forthcoming WHA toolkit (to be published early 2026).

The WHA was piloted at Cheshire East Council from 2022-2024. Although aspects of the WHA had, and continue to be, implemented across a range of local authorities, this was the first time that all 14 components were embedded into a single local authority. An independent evaluation of the pilot conducted by the University of Central Lancashire and University of Glasgow shows benefits to service provision, including a reduction in the number of survivors made homeless and evidence of greater domestic abuse support for survivors in temporary accommodation.^{lviii}

A cost-benefit analysis also showed significant financial incentives for local authorities to adopt the approach – for every £1 spent on WHA interventions, £10.20 in public sector savings was found to be generated – an especially important outcome in the context of limited financial resources within local government and increasing spend on temporary accommodation.^{lix} These initial findings highlight the importance of a holistic approach to supporting domestic abuse survivors experiencing or at risk of homelessness from both a moral and economic perspective.

Flexible Funding

One component of the WHA is Flexible Funding – low barrier, quick to access funding for survivors to support their housing needs.^{ix} In their evaluation of the Cheshire East pilot, Dr Lis Bates and colleagues noted how Flexible Funding was highlighted as a particular success by both service providers and survivors themselves.^{lxi}

In the context of temporary accommodation, Flexible Funding is tailored to individual needs and can include payment of rent arrears and other forms of debt clearance, removal costs – including covering childcare costs on moving days, and essential furnishings, clothing and food. Although Cheshire East are to date the only local authority to have piloted the full WHA, others have adopted various aspects, including Flexible Funding.

Box 4: Tri-Borough Flexible Funding

In the Tri-Borough of Kensington & Chelsea, Hammersmith & Fulham, and Westminster, the Flexible Funding model is an important mechanism for supporting survivors with a range of housing needs, including homelessness. Each of the three boroughs contributes £10,000 annually, totalling £30,000 per annum. Restrictions on the funding's use are limited, allowing for creative and bespoke approaches to supporting survivors' housing needs. Spend is determined on a case-by-case basis, with an emphasis on looking across a survivor's experiences and housing journey to help them in a way that best fits them as an individual.

Example uses of the Tri-Borough Flexible Funding include:

- Clearing rent and service charge arrears in temporary accommodation
- Installing smart doorbells to enhance survivor safety in their accommodation
- Providing essential furnishings, clothing and food
- Covering removal costs

However, it should be noted that Flexible Funding is often not able to cover the costs of flooring, despite this being a major cause of debt accrual for households moving into the social rented sector. This is due to the costs being too high in relation to the amount of funding available per year.

Flexible Funding is an important resource for covering basic costs for survivors in temporary accommodation. As Sonja Kapalay, the Senior Lead - Whole Housing Approach at STADA, notes, these costs are “not just about function, it's about making a house a home”. This provides some security and comfort and helps to alleviate the mental health load of homelessness, be this through supporting debt clearance or installing safety measures through smart doorbell provision.

In terms of its role within allocation policies where exemptions to rent arrears disqualification or deprioritisation have not yet been applied, Flexible Funding can provide direct support through arrears and other housing-related debt clearance. Where exemptions have been applied, Flexible Funding can be used in a more targeted way to support survivors with the costs of life in temporary accommodation.

Recommendations for central government

- Regulatory change is needed to exempt domestic abuse survivors from housing-related debt rules in allocation policies. A recent precedent was set by the 2025 regulatory change to exempt domestic abuse survivors from the local connection requirement. Nick Bano, barrister at Garden Court Chambers supported the Debt Trap project by drafting the required regulatory change.
- For refusals via nominations agreements to be recorded and monitored, with a reason provided for each refusal. This data will help determine whether debt rules are a contributing factor to refusals from registered provider housing.
- Government should develop a toolkit to support housing providers in the development, monitoring and review of nominations agreements.
- Commission analysis measuring where debt-related rules extend stays in temporary accommodation in comparison to those not in debt, and the estimated further cost of those stays, to provide a value for money assessment of such rules in comparison to the amount of debt that bars access to social housing registers.
- Local authorities should be required and resourced to provide meaningful advice and options to those excluded or restricted by the allocation process.
- Government should work with housing providers to develop a toolkit that supports the delivery of support-focussed pre-tenancy processes.
- Domestic abuse survivors should be exempted from the benefit cap. The benefit cap disproportionately affects women and its activation and grace period being related to current and recent work creates perverse outcomes whereby a survivor gets capped, but a perpetrator escapes it.^{lxii}
- That the default payment for universal credit (UC) to joint claimants be to the claimant who receives child benefit, rather than a nominated bank account. The current arrangement invites economic abuse. Although the regulations allow for split payments with the larger share going to the member responsible for childcare, requesting to split it risks triggering further abuse and very few requests are made^{lxiii}.

Recommendations for housing providers

- Housing providers should update their allocation policies to exempt domestic abuse survivors from rules that disqualify or deprioritise households in housing-related debt.
- Housing providers should ensure applicants' unique circumstances are considered when making decisions about whether someone can access a list and what priority they are given.
- Housing providers should review any restrictions relating to debt in their allocation schemes and consider whether they are compliant from an equalities point of view.
- Housing providers should commit to embedding domestic abuse training and support within their teams, with a view to adopting a Whole Housing Approach.
- Local authorities should provide meaningful advice and options for those excluded or restricted by the allocation process, including mechanisms such as rent arrears clearance and Flexible Funding schemes.
- Housing providers' pre-tenancy processes should prioritise supporting people into sustainable tenancies rather than informing decisions about whether to allocate a tenancy.
- Providers should consider part or fully-furnished properties for domestic abuse survivors, as recommended by End Furniture Poverty.

Appendix

Resources:

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MAKE A STAND

Our homes, our people,
our problem.

Since 2018, CIH have undertaken its campaigning work on domestic abuse under the banner of the Make a Stand campaign. Since then, over 500 organisations across the United Kingdom and Republic of Ireland have made a public commitment to improve their response to survivors.

Those organisations have committed to undertake the following:

1. Put in place and embed a policy to support residents who are affected by domestic abuse.
2. Make information about national and local domestic abuse support services available on your website and in other appropriate places so that they are easily accessible for residents and staff.
3. Put in place a HR policy, or amend an existing policy, to support members of staff who may be experiencing domestic abuse.
4. Appoint a champion at a senior level in your organisation to own the activity you are doing to support people experiencing domestic abuse.

"Housing related debt should not be a barrier to safety and security. We know that economic abuse goes hand in hand with other forms of domestic abuse and that this often leads to rent arrears.

It is time to revisit allocation policies that stand in the way of domestic abuse survivors accessing council and housing association homes at the time they need them most."

Alison Inman OBE, Past President, CIH

Scan QR CODE to sign the pledge or recommit your organisation:

