



Placement Policy

APRIL 2026

1. Introduction

- 1.1. Lambeth Council is committed to using all its resources and creativity to make the experience of homelessness rare, brief and non-recurring. We are determined to enable everyone to access a stable, secure and decent home regardless of tenure. This is in the context of a severe shortage of rented accommodation in Lambeth and in London and the Southeast generally.
- 1.2. This policy covers two elements of our strategy under Part 7 of the Housing Act 1996 (“HA 1996”):
 - Our use of temporary accommodation, under our “interim duty” to accommodate pending enquiries (Section 188 HA 1996), our ‘relief duty’ (Section 189B HA 1996), and also under our longer term duty to households accepted as homeless to whom we owe accommodation duties (Section 193(2) HA 1996)
 - Our use of private rented sector offers to bring to an end the Section 193(2) HA 1996 duty (Section 193(7AC).
- 1.3. This policy sets out how we allocate and determine the suitability of accommodation for households we place into either the private rented sector or temporary accommodation. It applies to both existing and future applicants under Part 7 HA 1996.
- 1.4. The Council is required, so far as is reasonably practicable, to secure that the accommodation it secures is available for occupation within the borough (Section 208(1) HA 1996). And, where accommodation is outside the borough, in judging its suitability, we must take into account its location and distance from Lambeth (Art 2 of the Homelessness (Suitability of Accommodation) (England) Order 2012).
- 1.5. However, the realities of the severe shortage of housing within the borough, the London area and the wider Southeast, rising rental costs, and growing pressures on local government funding mean we have increasingly to procure accommodation further afield. This is so we can secure a sufficient number of affordable properties for all those who need them. In consequence, compliance with our statutory duties (including having regard to relevant parts of the Homelessness Code of Guidance) will still result in most households having to move out of the borough and often away from the Southeast of England.
- 1.6. As the Council is facing these increasing difficulties in housing applicants inside the borough, it has become more necessary to make decisions about the suitability of out of borough placements for individual households and balance these against the type and location of temporary accommodation and private rented accommodation that can be offered.

- 1.7. In many cases the Council consider housing outside of the borough will be more sustainable for individual households in the longer term, with lower rents and Council Tax allowing them to better meet their subsistence and household costs and avoid rent arrears. In some cases, the benefit cap may also cease to apply.
- 1.8. This policy applies to all those households who have been accommodated by the Council under our homelessness duties. In this policy a reference to the “household” includes not only the applicant and those who live with them as members of their family but also to any other person who might reasonably be expected to live with them.
- 1.9. This policy does not cover households who have secured their own accommodation in the private rented sector as the Council will not have been able to assess the suitability of accommodation in these circumstances.
- 1.10. This policy may be amended according to changing levels of need or legislation or changes to the Homelessness Code of Guidance or other guidance. Any changes must be approved by the Cabinet Member for Housing, Investment, and New Homes.

2. Public Sector Equality Duty

- 2.1. In implementing this policy, the Council and officers will have due regard to its duties under the Equality Act 2010, and the impact of the policy’s application upon households with protected characteristics. In particular, the Council must have due regard to the need to:
 - eliminate any form of unlawful discrimination (including direct or indirect discrimination, harassment, victimisation, and any other conduct prohibited under the Act)
 - advance equality of opportunity between people who share a relevant characteristic and people who do not
 - foster good relations between people who share a protected characteristic and people who do not.
- 2.2. The provisions set out in this policy are designed to mitigate the impact of the wider housing crisis on households including those with protected characteristics.

3. Temporary Accommodation

- 3.1. Temporary accommodation is accommodation that we provide to an applicant and their household whilst we decide what long-term housing duty, if any, we owe that applicant.
- 3.2. Temporary accommodation is not a long-term solution for residents. In particular hotel accommodation is reserved for emergency purposes only. Our aim is that households should spend as little time as possible in temporary accommodation. We aim to ensure that the accommodation we offer, meets the needs of the household and meets the suitability criteria set out below.

4. Offers under the 'interim duty' to accommodate

- 4.1. Due to the shortage of suitable accommodation in Lambeth, homeless applicants who are housed under the Council's "interim duty" to accommodate (Section 188 HA 1996) will initially be placed in emergency accommodation, including bed and breakfast, hostels and short-term self-contained accommodation, such as annexes, while enquiries are carried out. Such "interim accommodation" must demonstrably reflect value for money.
- 4.2. This accommodation may be outside of the borough.
- 4.3. Wherever possible the Council will avoid placing households with dependent children or pregnant women in bed and breakfast accommodation. Where no other suitable accommodation exists and such placements are necessary, the Council will aim to move these households to more suitable self-contained accommodation within six weeks.
- 4.4. Applicants will be given one offer of interim accommodation pending a decision as to what duty (if any) is owed.
- 4.5. There is no obligation upon the Council to enable applicants to view the interim accommodation prior to acceptance. In making the offer, the household's individual circumstances will be considered, taking into account the likely duration of stay in that accommodation.
- 4.6. All offers of accommodation will be given in writing. The letter will state:
 - The address of the property being offered
 - The consequences of refusal.
- 4.7. In instances where an applicant refuses an offer of interim accommodation pending the homeless assessment, the Council's duty to provide interim accommodation will be discharged. No other accommodation will be offered pending a decision as to what duty (if any) is owed.

- 4.8. There are no minimum space standards for interim accommodation as the priority is to ensure that the household have somewhere to stay. The exact occupancy will depend on the layout of the property.
- 4.9. Interim accommodation cannot be used once a main duty (s193) has been accepted.

5. Offers of Temporary Accommodation

- 5.1. Where the Council decides it has a duty to secure that accommodation is available for occupation by the applicant and their household (Section 193(2) HA 1996), they may be offered longer-term temporary accommodation.
- 5.2. Applicants will be given one offer of suitable accommodation, and this will be under the main housing duty (Section 193 HA 1996), where the offer of accommodation will be temporary accommodation.
- 5.3. This accommodation may be outside of the borough.
- 5.4. There is no obligation upon the Council to enable applicants to view the accommodation prior to acceptance. In making the offer, the household's individual circumstances will be considered.
- 5.5. All offers of accommodation will be given in writing. The letter will state:
 - The address of the property being offered:
 - The consequences of refusal
 - The right to review the offer (if applicable)
 - The right to request an extension of the provision of temporary accommodation pending review.
- 5.6. If an applicant rejects an offer, they will be asked to provide their reasons for refusal. This applies to:
 - Those seeking a transfer from existing temporary accommodation
 - Those in temporary accommodation that are owed the main housing duty under Section 193 HA 1996 and are required to move by the Council
 - Accepted homeless applicants that are not currently in temporary accommodation, but who the Council has a duty to accommodate under Section 193 HA 1996

- 5.7. The Council will consider the reasons given and undertake further enquiries as necessary. If the Council accepts the reasons for refusal and agrees the offer is unsuitable, the offer will be withdrawn and a further offer will be made.

Where an applicant refuses an offer of suitable accommodation and the Council does not accept their reasons for refusal but considers that the offer was suitable to accept, they will be notified of this in writing.

- 5.8. In cases where an applicant has refused a suitable offer of accommodation under Section 193 HA 1996, the Council will discharge its duty to provide accommodation under that full homeless duty.
- 5.9. If the applicant is resident in interim accommodation under the interim duty (Section 188 HA 1996) they will also usually be asked to vacate the property within 14 days, subject to the period of notice set out in the licence agreement.
- 5.10. There is a right to request a review of the suitability of accommodation offered under Section 193 HA 1996 (Section 202 HA 1996).

6. Private Rented Sector Offers

- 6.1. We aim to prevent and relieve homelessness through assisting households to stay in their existing accommodation. Where this has not been possible and a household is either in temporary accommodation under Section 193(2) HA 1996 or will lose their existing accommodation, we will assist them into a suitable private rented home as quickly as possible. This means that we will arrange for a private rented sector landlord to make an offer of a tenancy in the private rented sector for a period of at least 12 months (Section 193(7AC) HA 1996). We will evaluate each offer both with regard to the needs of the household and the nature of the accommodation to be offered.
- 6.2. The Council anticipates that a private tenancy will be appropriate for most applicants, unless there are exceptional circumstances which mean that this is not possible. We therefore expect to use the power to discharge duty into the private rented sector in the majority of cases where a homelessness duty is accepted.
- 6.3. Offers of private rented homes are only applicable to households who approached the Council as homeless or threatened with homelessness on or after 9th November 2012.
- 6.4. For applicants owed the statutory homelessness prevention, relief, or main duty and who are assessed as being able to sustain a tenancy, we will make one suitable offer of affordable private rented housing. Individual circumstances are considered in making these offers, including time scale, affordability, household preferences and needs. An acceptance of any suitable offer will end the Council's

statutory duty. The household will be notified in writing and the Council's statutory duty will be formally ended, whether the offer is accepted or refused.

- 6.5. Changes in the housing market, combined with the freeze on Local Housing Allowance rates mean that there is very little affordable accommodation available within London and Southeast England, let alone in the borough. Therefore, the reality is that most households will be made an offer of affordable private rented sector accommodation in parts of the country where Local Housing Allowance rates more closely aligns with average rents.
- 6.6. The amount of time households are given to consider a private rented sector offer of accommodation is dependent on how far away the property is from their current accommodation, based on the following travel times by public transport to the property:
 - Within a 60 minute radius – 24 hours
 - Between 60 and 90 minute radius – 48 hours
 - Over 90 minutes – 72 hours.
- 6.7. If an household wants a certain type of property in the private rented sector or in a specific area, we will advise them to conduct their own search. This enables households to choose the property they want to live in. If an applicant finds a property and it meets the suitability criteria, we will assist them in securing the tenancy. A household must not sign any tenancy agreement before we determine that the property is suitable, and the tenancy complies with certain conditions. This will then be deemed to be an offer of accommodation from the Council, and the Council will discharge its duty towards them. The Council will continue to make an offer of private rented accommodation to the household whilst the household continues their own search.
- 6.8. So far as is practicable, if placing vulnerable households outside of Lambeth, we will ensure they will continue to receive appropriate support. In all cases we will notify the host borough of the household details through the Section 208 HA 1996 process. All households will also be given details of their local GP surgeries, schools, religious communities, and community centres as applicable.
- 6.9. There is an expectation that applicants will provide all relevant information about their households' circumstances at the earliest opportunity to ensure decisions about property location and suitability can be made. Applicants who do not provide reasonably requested information and evidence to determine their households' circumstances will be deemed to be suitable for an offer of accommodation in any area when no suitable property is available closer to Lambeth.

7. Suitability

- 7.1. We need to ensure that the accommodation we offer is suitable for the households we seek to place. This policy applies to both offers of both temporary and also private rented sector accommodation. In determining whether a property is suitable we will balance the needs of the household with the nature of the accommodation being considered. A key factor in determining location is the availability of suitable affordable housing.
- 7.2. It also follows from this extreme shortage of affordable accommodation that we will prioritise some households ahead of others for the limited number of more local properties that become available.
- 7.3. Priority for in-borough accommodation will be given to those households whose needs indicate that they would best be housed in Lambeth or close to it. This means that the Council will reserve more local properties to meet the needs of households who has been assessed as needing to remain in the area.
- 7.4. The specific factors we will take into account in prioritising such households are set out within the following paragraphs, which paragraphs explain our approach to suitability of accommodation generally.

8. Affordability

- 8.1. Before making an offer of accommodation, we will assess each household's income and expenditure. This is in order to ensure that the household can afford to pay the rent for the property.
- 8.2. We will aim to secure properties for rent within the Local Housing Allowance rates as far as reasonably practicable so that they are affordable for households receiving housing benefit/universal credit.
- 8.3. In cases meeting the criteria set out in our Discretionary Housing Payments (DHP) Policy, we may award a time-limited DHP to pay for shortfalls between Housing Benefit/the housing element of Universal Credit and Local Housing Allowance rates. The DHP Fund is a short-term emergency fund, awarded whilst the household takes action to resolve their housing problems in the longer term. This can include taking steps to find work or taking steps to maximize their welfare entitlements.

9. Location

- 9.1. For households reliant on benefits to cover their housing costs there is an extremely limited supply of properties. We will support households to move to accommodation outside of Lambeth:

- Where there is an ongoing threat to the safety of a household if they remain in Lambeth
 - Where there is no suitable affordable accommodation within Lambeth available.
- 9.2. The nature of the housing crisis means that our procurement activity will be focused on those areas of the country where the applicable Local Housing Allowance rates will still cover the majority of the rent.
- 9.3. Those properties that the Council does secure either as temporary accommodation or as private rented sector offers will be allocated in accordance with the priority of households requiring accommodation at that time. This will be determined by reference to the relevant factors set out in this policy and in Article 2 of the Homelessness (Suitability of Accommodation) (England) Order 2012. We will consider the factors below, as are relevant, when determining the suitability of the location of the accommodation. The household may be asked to provide additional or updated information relating to their current circumstances to assist the Council in its determination.
- 9.4. In considering these relevant factors, the primary issue will be the availability of housing that is affordable to the household. For most households this is likely to be the main factor in determining the suitability of the location of an offer of accommodation.
- 9.5. We will refer to these factors when we explain to an applicant why they are being offered particular accommodation, and why an alternative is not being offered if there is more than one property available.
- 9.6. It is important to understand that having priority for more local accommodation does not mean that it will be possible to find such accommodation, or that such an offer will be made. The primary consideration is the availability and affordability of accommodation. This means that even where an applicant meets one or more of the relevant criteria below, they are not guaranteed to be placed locally. This is dependent on the availability of such accommodation.

10. Employment

- 10.1. When a member of the household is in paid employment, we will consider the need to reach their normal workplace from the accommodation being considered.
- 10.2. We will give priority for accommodation in Lambeth and its vicinity to households where a member of the household is in paid employment and a move out of Lambeth would result in termination of this employment with no prospects of finding employment in the new location.
- 10.3. Priority for accommodation within a commuting distance (being 90 minutes by public transport) of a place of work will be given to:

- Households where a member of the household has been continuously employed for a period of at least 6 months immediately prior to an offer of accommodation and for 24 hours or more per week. This does not include Zero Hour Contracts as these do not provide any guarantee of future income.
- Households where a member of the household is on maternity / paternity / adoption leave from employment that meets the criteria above.

11. Self-Employment

- 11.1. Where a member of the household is self-employed, each case will be assessed on its own merits, taking into account the nature of the business and how it is delivered. People working remotely, or those engaged within the 'gig economy' (e.g. Uber drivers, Deliveroo etc) can be expected to relocate easily. Skilled self-employed workers without employees (e.g. plumbers, electricians etc) can also be expected to be able to relocate unless they can demonstrate an ongoing commercial contract that can only be delivered locally.
- 11.2. Where the business is delivered through a fixed point (e.g. a shop) that the person needs to be at on a regular basis, we would expect the 90-minute travel time from that point (see 'Employment' above) to apply.

12. Caring responsibilities

- 12.1. We will consider caring responsibilities on an individual basis when determining where would be a reasonable location for the household in question to live.
- 12.2. We will consider households with members who are registered carers in receipt of carer's allowance and provide care for a member of the family who is not part of the household but who resides in Lambeth. We will give priority for accommodation in Lambeth and its vicinity to the carer's household if the person being cared for would require statutory health and social support if the care ceased.
- 12.3. Our expectation is that applicants can demonstrate a longstanding arrangement to provide care and support to another family member in Lambeth who is not part of the applicant's household and would be likely to require statutory health and social support if the care ceased. Applicants would need to be in receipt of Carers Allowance to meet this criterion.

13. Education

- 13.1. Where the household includes a child/children of school age, attendance at schools will be considered before an offer of accommodation is made. The Council understands that disruption to education and established support networks can be

detrimental to a child's development but also recognises that the impact of homelessness and living in insecure or temporary accommodation for a length of time can equally be detrimental.

13.2. Therefore, an assessment of the child's need will be carried out which will look at the requirement to both promote and safeguard their welfare.

13.3. We will take the age of the child and the stage of their education into consideration. If households include children who will take statutory exams within the academic year, we will aim to assist them in finding accommodation within 75 minutes travelling distance from their existing school(s). This includes children enrolled in GCSE, AS or A level courses or post-16 vocational qualifications in schools in Lambeth.

13.4. Households that include children who are not taking statutory exams within the academic year may have to move further away. In such a case, we would advise that the children change schools.

13.5. Where an offer is made to a household that includes children who are taking statutory exams within the academic year, we will aim to assist them in finding accommodation within 75 minutes travelling distance from their existing school(s)

13.6. Where the Council makes an offer of private rented sector accommodation it is reasonable to assume that children under year 10 could transfer to a new local school and that this would not constitute a significant disruption to their education. This assumes there are appropriate school places available within a reasonable distance of the accommodation offered, which the Council would establish.

14. SEND Educational needs

14.1. If children have a SEND Statement it is necessary to assess whether a transfer to a location out of the borough would represent a significant disruption to their education. This is dependent on a recommendation from Children and Family Services on the potential impact on the family.

14.2. This may also involve making enquiries of the potential host authority to establish that those needs could be met in a local school. Each case will be considered on an individual basis.

14.3. In assessing the suitability of an offer of accommodation, the location of the educational provision should be the guiding factor, and travel times to this provision. We would normally expect placements to be within a radius of 75

minutes by public transport to the educational provision to be reasonable. SEND only

15. Children subject to Family Help or Safeguarding Children's Social Care

15.1. We will consider any cases where children are subject to a Family Help /Child In Need or Child Protection plan on an individual basis. Social workers will advise on these cases, in order that we consider all safeguarding concerns and determine whether the household should be prioritised to stay in the borough. However, in some cases, the children may benefit from a move out of the borough, as that could eliminate the threat to their well-being.

15.2. We will consider any cases of households within Lambeth, who are open to Children's Social Care or those who are linked into local health services or have high social needs. Where it is confirmed by Children's Social Care that move to another area would significantly impact their welfare, the household should be accommodated within the borough wherever possible.

16. Adults in education

16.1. We will take into account the needs of any adult in the household who is in education. This includes adults in higher or adult education, vocational and professional training, or a recognised apprenticeship.

16.2. Where the applicant or their partner is undertaking degree level or postgraduate study at university, in making a decision about the location of accommodation, consideration will be given to the potential disruption to those studies having regard, for example, to on-site student accommodation and on-line learning facilities. This will be balanced against the wider benefits of stable sustainable accommodation to the household.

16.3. Where the applicant or their partner is undertaking degree level or postgraduate study at university, which is intended to be completed within 12 months, wherever practicable we will seek to place such households within 90 minutes' travelling distance by public transport of their university.

16.4. Our normal expectation is that an adult child or other adult household member should approach the academic institution they are studying at for assistance in securing local accommodation. The remaining household members will be expected to accept an offer of accommodation in line with the provisions in this policy.

17. Medical facilities, medical and health issues

17.1. We will take into account individual medical and health needs. We will consider any ongoing treatments and the implications of transferring to healthcare providers closer to new accommodation.

17.2. When determining suitability with regard to the household's medical needs, we will consider whether the medical condition itself makes the housing and location offered unsuitable. If the household identifies previously unidentified medical grounds as a reason for refusing the accommodation, we will ask them to submit medical evidence within a reasonable time period.

17.3. We will give priority for accommodation in Lambeth and its vicinity to households with member(s) who meet at least one of the following conditions:

- a severe and enduring physical or mental health condition requiring regular specialist care that a move from Lambeth and its vicinity would significantly disrupt
- an enduring physical or mental health problem where a loss of a local support network would severely impact their well-being.

17.4. To be considered for more local accommodation households need to demonstrate one of the following:

- Member(s) with a severe and enduring health condition requiring intensive and specialist medical treatment that is only available in Lambeth
- Member(s) who are in receipt of a significant package and range of health care options that cannot be easily transferred
- Member(s) with a severe and enduring mental health condition who are receiving psychiatric treatment and aftercare provided by community mental health services and have an established support network where a transfer of care would significantly impact their wellbeing.

17.5. Unless there are extenuating circumstances meaning that the member(s) in question cannot use public transport and do not have access to a car, or that services cannot be provided out of borough, we would expect that households can reasonably be placed within 75 minutes travel by public transport radius from the healthcare provision referred to in the previous paragraph.

17.6. Only where the service/care cannot be provided outside the borough would we expect an in-borough placement to be more appropriate.

18. Adaptations

18.1. Where the applicant, or a member of their household, requires adaptations to a property, the Council will consider whether there is a reliable prospect of the adaptation being carried out. This means that the adaptation may not have been

carried out at the point of offer, but that the property can otherwise be regarded as suitable.

19. Domestic Abuse

19.1. Where the applicant, or member(s) of their household are victims of domestic violence or abuse, the household will be placed in an area where the risk of violence is minimised, having given consideration to all other factors within this procedure. This is to ensure their continued safety.

20. Services, amenities and transport

20.1. In considering the suitability of an offer, we will consider accessibility to local services, amenities, and transport. This means access to shops, health care, schools, and public transport. This is specific to individual properties rather than broad geographic locations.

21. Wider community support networks

21.1. We understand that some households rely on local support networks in their daily lives more strongly than others. The nature of the support varies. It includes but is not limited to childcare, membership of a religious community, or support for recovering drug addicts. We will consider any such circumstances on an individual basis. Therefore, we will take into account situations where a loss of local support networks would be significantly detrimental to the wellbeing of the household alongside the availability of accommodation.

21.2. In considering the suitability of an offer, we need to consider the needs of the household being placed and the nature of the community that we are placing them into. The aim is to ensure that the placement is sustainable in the long term. Consideration should be given to whether cultural and religious needs can be met within the community they are being placed in and access to services for those households with specific needs.

22. Choice of Area

22.1. Consideration will be given to applicants who indicate a desire to be housed in a particular area outside of Lambeth. They will be offered assistance to secure suitable accommodation in those area(s) so far as reasonably practicable but may be offered any suitable accommodation in accordance with this policy.

5. Support for Households

22.2. Where an applicant accepts an offer of out of borough accommodation, we have a statutory duty to notify the local authority for the borough in which that

accommodation is situated of that placement. Additionally, where an applicant accepts accommodation outside of the borough, we will offer them support to make the move. This may include financial support to enable them to make a permanent move. Relocation support may include information on:

- local schools
- Special Educational Needs support
- local child care
- local GPs
- housing benefit as well as any other benefits the household may be entitled to
- information on their new local council, Council Tax, registering to vote and relevant local services
- community care services and social groups
- where relevant, information on local employment opportunities
- guaranteeing rent payments to landlords for up to a year where a resident is not able to provide evidence of income

6. Right to Review

Applicants have a statutory right to request an internal review regarding decisions we make on several issues. One of these is suitability of accommodation. If the outcome of the review is in the applicant's favour, this means that the decision to end our duty is set aside and we will then make a further offer of suitable accommodation.

If the applicant is not satisfied with the outcome of the review, they can appeal to the County Court, but only if the Council has made a legal error when making the decision. An appeal must be brought within 21 days of notification. If the applicant has not been notified of the outcome within the prescribed time period, an appeal must be brought within 21 days of when they should have been notified.

7. Tackling fraud

It is an offence for a person to knowingly make a false statement intended to induce the Council to believe that they or any others are entitled to accommodation. Where we suspect that a fraud may have been committed, this matter will be investigated and may lead to criminal proceedings being instigated.