

Transfers & Mutual Exchange Policy

Our Vision

Building better lives through social care and housing in local communities.

Our Mission

We co-design and deliver services that offer innovative social care solutions and support people to thrive.

Our Values

We are **caring** and **compassionate**



We are **inclusive** and **trusted**



We focus on **excellence** and **innovation**



We work in **partnership** and are **one-team**



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 **Look Ahead**
CARE, SUPPORT AND HOUSING

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1. Introduction

- 1.1 We are committed to ensuring that customers are able to move safely and lawfully between properties where this is necessary, appropriate or permitted under legislation. This policy sets out how we manage internal transfers and mutual exchanges across all accommodation that we own, lease or manage. It aims to support customer wellbeing, safeguard individuals, promote the responsible use of housing stock and enable the efficient management of homes.
- 1.2 Transfers may be required for a number of reasons, including:
 - Changes in a customer's health
 - Risks to a customer
 - Suitability of the service for a customer
 - Safeguarding concerns
 - Service redesign
 - Commissioning requirements
- 1.3 Mutual exchange is a statutory right for eligible tenants and provides an additional route for customers to move, where appropriate. Decisions relating to transfers or mutual exchanges must reflect the underlying tenure, legislative requirements, service model and any commissioning obligations.
- 1.4 All decisions under this policy must be fair, evidence based and proportionate. Customers must receive clear information setting out the reasons for decisions, the criteria applied and any rights they may have to request a review of the decision. Risk to safety, wellbeing and service stability must be considered in every case.
- 1.5 Transfers and mutual exchanges within our supported housing are further constrained by commissioning requirements, eligibility criteria and the specific customer groups each service is designed to support. Decisions must ensure that any move remains consistent with the service model and supports the safety and stability of customers and the wider environment.
- 1.6 This policy applies to all homes that we own, lease or manage and to every tenancy or licence issued by us. It covers our approach to internal transfers within our properties and to mutual exchanges where these are permitted under the law and under the conditions of the customer's occupancy agreement.
- 1.7 The policy applies to all staff involved in allocations, tenancy management, support provision, income management and service leadership. It sets our expectations for assessing transfer requests, determining eligibility, managing risks and ensuring that decisions are lawful, fair and consistent.

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- 1.8 The policy does not define access routes into our accommodation which are set out in the Allocations & Lettings Policy and the Referrals & Assessment Policy. It also does not describe operational processes for move-on planning, property inspections, risk assessments, liaison with external landlords or the administration of statutory mutual exchange applications. These matters are addressed within operational policies and procedures.
- 1.9 The principles within this policy apply across general needs housing, supported housing and any service where we provide accommodation or manage agreements on behalf of external landlords. Where commissioning requirements, statutory duties or contractual obligations set additional conditions, these must be applied alongside this policy, within the relevant legal framework and approved by the Director of Housing & Customer Experience.
- 1.10 This policy does not apply when a customer is being decanted, temporarily, to allow for major works or repairs to their current home. Under these circumstances the Decants Policy must be followed.

2. Definitions

- 2.1 An **internal transfer** is a move from one of our homes to another that is approved by us due to the suitability of the service, safety, risk, commissioning requirements or other lawful grounds.
- 2.2 A **management transfer** is initiated or supported by us to protect a customer's safety, wellbeing or stability or to respond to significant operational or safeguarding concerns.
- 2.3 A **customer requested transfer** is a transfer initiated by a customer in line with this policy and based in changes in their circumstances, suitability or other eligible criteria.
- 2.4 A **mutual exchange** is a legal mechanism that allows eligible tenants to swap homes with another tenant – subject to statutory requirements and approval from all relevant landlords.
- 2.5 **Eligibility** is the criteria a customer must meet to be considered for an internal transfer or mutual exchange, including the suitability of their current home, conduct, rent account status and tenure type.
- 2.6 **Suitability** is determined by an assessment of whether a property meets the household's needs, taking account of:
- Their health and safety
 - Disability
 - Commissioning arrangements
 - Household size
 - Service model

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- 2.7 A **risk** is any factor that may affect the customer's safety or wellbeing, the safety of others or the stability and effective operation of the service. Risk considerations must be central to all transfer and mutual exchange decisions.
- 2.8 **Tenure** is the legal basis upon which a customer occupies their home, including assured tenancies, assured shorthold tenancies, licences and other occupancy agreements.
- 2.9 **Commissioning requirements** are conditions set by commissioners that determine eligibility, customer groups or service models. These requirements may limit or enable transfers within or between services.
- 2.10 An **occupancy agreement** is the legal agreement that sets out the customer's rights and responsibilities in relation to their accommodation and determines their eligibility for a transfer or mutual exchange.
- 2.11 The **strategic principles** guide all transfer and mutual exchange decisions across our services. They ensure a fair, lawful and consistent approach that supports customer wellbeing and the responsible use of housing stock. We must ensure that our homes are used effectively and in accordance with commissioning requirements. Transfer and mutual exchange decisions must support the efficient allocation and management of properties.
- 2.12 **Regulatory Requirements** are the standards, expectations and statutory duties set by relevant regulators, including the Care Quality Commission (CQC), Ofsted, and the Regulatory of Social Housing, which apply to particularly services, properties or tenures. These requirements may related to safety, quality, of care or support, governance, consumer standards, eligibility, service models or risk management and must be complied with when assessing, approving or refusing a transfer or mutual exchange.
- 2.13 **Non-commissioned homes** are self-contained Look Ahead homes that are not funded or commissioned for support by a council or other body, and which are used mainly for independent living.

3. Internal Transfers

- 3.1 Internal transfers allow our customers to move from one of our properties to another where this is necessary, lawful and consistent with our organisational responsibilities. Decisions must reflect the customer's underlying tenure, commissioning arrangements, property suitability and the needs of both the customer, the customer's household and the service.

Purpose of Internal Transfers

- 3.2 Internal transfers may be considered where:
- a customer's current accommodation is longer suitable
 - there are safety or safeguarding concerns

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- service re-design requires customers to relocate
- a move would support the responsible use of our housing stock

Eligibility for Transfer

3.3 Eligibility for an internal transfer will depend on the customer's:

- tenure
- conduct
- rent account position
- engagement and suitability of the proposed home
- any commissioning requirements

Management Transfers

3.4 Management transfers may be approved where there is a significant risk to the safety or wellbeing of the customer or service stability. Management transfers must be supported by clear evidence, risk assessment and appropriate safeguarding considerations. They must be authorised by the Head of Housing.

Customer Requested Transfers

3.5 Customers may request a transfer where their circumstances have changed or where their current accommodation is no longer appropriate. Requests must be submitted in writing (including by email) and assessed against eligibility criteria, risk, suitability and the availability of appropriate accommodation. Decisions must be fair and evidence based.

4. Suitability of Accommodation

4.1 Any offer of alternative accommodation must be suitable for the customer and, where relevant, their household's needs. The assessment must take account of:

- household composition
- any/all protected characteristics
- health
- risk
- accessibility
- commissioning requirements

4.2 A transfer will not normally be approved where the move would create overcrowding, under-occupation or conflict with service eligibility criteria. For supported housing the receiving service must confirm, in writing (including by email), that the customer meets commissioning eligibility and risk thresholds before any transfer can proceed.

Safeguarding & Risk Considerations

4.3 Where transfer requests involve safeguarding concerns or significant risk staff must follow safeguarding procedures. Safeguarding considerations may influence the urgency, eligibility or destination of a transfer. Staff must apply the risk

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management expectations, including the principles of [See Think Act](#) when considering transfer requests.

Impact on Services and Housing Stock

- 4.4 Transfer decisions must consider the operational needs of services, contractual obligations and the responsible use of our housing stock. Approval will depend on whether the transfer supports service stability and complies with commissioning requirements. No transfer will be approved where the move would undermine the commissioning model, exceed agreed capacity or compromise the safe and effective operation of the receiving service.

5. Mutual Exchange

- 5.1 Mutual exchange allows eligible tenants to swap homes with another tenant – subject to statutory requirements and the landlords’ approval.

Eligibility for Mutual Exchange

- 5.2 Eligibility for mutual exchange depends on the customer’s underlying tenure and the statutory rights attached to it. Customers in supported or commissioned services are not normally eligible for mutual exchange as these properties are allocated through specialist referral pathways and restricted to defined customer groups.

Legal and Contractual Requirements

- 5.3 All mutual exchange requests must comply with relevant housing legislation and with any contractual or commissioning obligations. Decisions must take account of:
- property suitability
 - the rights of the incoming tenant
 - the needs of the outgoing tenant
 - any legal restrictions that apply to the specific tenure

Grounds for Refusal

- 5.4 A mutual exchange request may be refused where statutory grounds apply, including concerns relating to:
- rent arrears
 - conduct
 - property suitability
 - safeguarding concerns
 - risks to service stability
- 5.5 Refusals must be lawful, evidence based and supported by clear evidence. Mutual exchange may also be refused where it conflicts with commissioning conditions or where allowing the exchange would create over-crowding, under-occupancy, create service instability or pose a risk to other customers or staff.

Suitability

- 5.6 We must ensure that both parties to a mutual exchange are moving into accommodation that is suitable for their needs. Suitability assessments must consider:
- property size
 - accessibility
 - health needs
 - risk
 - household composition
 - commissioning criteria that apply to the service
- 5.7 For supported and specialist services, mutual exchange will not be approved where the proposed incoming household does not meet the commissioning criteria, risk profile or customer group for which the property is designated.

Safeguarding and Risk Considerations

- 5.8 Where concerns arise about exploitation, coercion or other safeguarding risks linked to a proposed exchange, the Safeguarding Adults and/or Safeguarding Children Policies must be followed. Safeguarding considerations may influence the decision or conditions attached to approval. All safeguarding or risk issues identified whilst assessing an application for a mutual exchange request must be clearly recorded and, where appropriate, escalated to the Safeguarding Manager.

6. Customer Communication

- 6.1 Clear, accessible and timely communication is essential to ensure that decisions relating to transfers and mutual exchanges are fair, transparent and understood by customers. Customers must be informed of concerns or outcomes that affect their accommodation and of any rights available to them under this policy.

Communicating Decisions

- 6.2 Customers must receive written confirmation of any decision made under this policy within 3 working days of the decision being made. Communications must be provided in a format that meets the customer's communication needs and set out:
- the decision reached
 - the reasons for the decision
 - any implications of the decision on the customer's housing

Acceptance of Accommodation Condition

- 6.3 Customers offered a transfer, or mutual exchange must be informed that properties are offered as seen and as available at the point of offer, subject to compliance with statutory safety requirements.

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Customers will not normally be able to request improvements, alterations or non-essential repairs as a condition of accepting an offer. The property will meet relevant health and safety standards, and any safety-critical or legally required works will be completed in line with our Repairs Policy.

This requirement must be clearly explained to customers before an offer is accepted, and confirmation of acceptance must be recorded in writing

7. Complaints and Appeals

- 7.1 Customers have the right to request a review where they believe a decision regarding a transfer or mutual exchange has not been applied correctly, fairly or proportionately.
- 7.2 Reviews must be undertaken by a manager who was not involved in the original decision. The reviewer must consider the evidence and assess whether the policy was followed and determine whether the outcome must be upheld or amended.

Escalation to Senior Management

- 7.3 Cases involving significant risk, complex circumstances or disagreement about the outcome of a review may be escalated to the Director of Housing & Customer Experience or another senior decision maker. Escalation is reserved for decisions that may have legal, regulatory or organisational implications. The senior decision maker will normally be final.

Complaints

- 7.4 Concerns relating to service quality, communication or staff conduct that fall outside the scope of this policy must be managed through the Complaints & Feedback Policy. Customers must be signposted to this route, where appropriate.

Accessibility and Support

- 7.5 Customers must be informed of their right to seek independent advice or advocacy where they require support to understand or challenge a decision. Reasonable adjustments must be made to ensure that review and communication processes are accessible to all customers.

Record Keeping and Confidentiality

It is the Policy Owner's responsibility to update the Asset & Liability Register with any risks and/or information arising from the implementation of this policy.

We will comply with our Data Protection and Confidentiality Policy which can be found by clicking [Here](#) or visiting our website at www.lookahead.org.uk

Inclusion and Diversity

A person centred approach is applied to the assessment and management of all transfers or mutual exchanges. We will consider and, if necessary, mitigate or remove any risk, or potential risk, to the customer and/or their household for each of the protected characteristics during the assessment process.

Policy Sign Off and Ownership

Document Name	131.00_Transfers-Mutual-Exchange
Version	1.0
Equality Impact Assessment	EIAs are carried out as part of the assessment process. Any risks identified will be either mitigated or removed.
Who was consulted?	Policy Group Executive Director, Group Operations & Customer Experience
Approved By/Date	Policy Group, 18 April 2026 Executive Director, Group Operations & Customer Experience, 5 May 2026
Date for Review	December 2026
Exec Director Policy Owner	Director of Housing & Customer Experience
Author	Head of Housing
Related Policies/Procedures	Asset & Liability Register Allocations & Lettings Policy Referrals & Assessments Policy Tenure Management Policy Income Collection Policy Ending an Occupancy Policy Tenancy Fraud Policy Living Standards Policy Voids Policy Decants Policy Repairs Policy Safeguarding Adults and Safeguarding Children Policies Health & Safety Policy
Relevant Legislation and Regulatory Requirements	Housing Act 1985 Housing Act 1988 Localism Act 2011 Housing & Regeneration Act 2008 Social Housing Regulation Act 2023 (Tenancy Standard, April 2024) Revised Directions on Tenant Involvement & Mutual Exchange 2023

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Version History			
Version	Date	Description of Changes	Author
1.0	April 2026	New Policy	Joe Thomas