

Hidden Child Homelessness in Council Temporary Accommodation

A Policy Case for Relocatable Modular Family Housing on Public Land

New government data, published following an *Inside Housing* investigation, has revealed a previously hidden population of nearly 6,000 children living in council-owned temporary accommodation with shared bathrooms or kitchens, in addition to 6,400 children already recorded in bed-and-breakfast (B&B) accommodation (*Ministry of Housing, Communities and Local Government, 2025; Inside Housing, 2026*).

Crucially, these children fall outside existing legal protections limiting the use of B&Bs for families to six weeks. As a result, 90% of children in council-owned shared accommodation have been there longer than six weeks, exposing a major policy gap.

This paper proposes a scalable solution: relocatable, self-contained modular family housing on council-owned land, delivered at affordable rents under lease based models.

Executive Summary

~6,000

Hidden children

In council-owned temporary accommodation with shared facilities

6,400

B&B children

Children already recorded in bed-and-breakfast accommodation

90%

Over six weeks

Children in council-owned shared accommodation exceeding the six-week threshold



⚠️ These children fall **outside existing legal protections** limiting the use of B&Bs for families to six weeks — exposing a major policy gap.

1. The Scale of the Hidden Crisis

1.1 Newly Revealed Data

Government figures (*June 2025*) show:

~6,000

Children in council-owned temporary accommodation with shared facilities

6,400

Children in B&B accommodation

3,380

Households with children in B&B-style accommodation

90%

Exceeding six weeks in council-owned shared accommodation

65%

Exceeding six weeks in privately owned B&Bs

These figures reveal a significant undercounting of child homelessness due to classification gaps (*MHCLG, 2025; Inside Housing, 2026*).

1.2 A Policy Data Loophole

Under the Homelessness (Suitability of Accommodation) (England) Order 2003, the six-week limit applies only to privately owned B&Bs, **not those owned or managed by councils.**

"No child should be living somewhere without a kitchen or bathroom for an extended period of time, regardless of who owns it."

— Dame Rachel de Souza, Children's Commissioner for England (*De Souza, 2026*)

2. Impact on Children

Children in shared temporary accommodation face well-documented harms across three critical domains:

Health

- Increased illness transmission (*Public Health England, 2018*)
- Poor nutrition due to limited cooking access

Education

- Disrupted schooling and attainment (*Department for Education, 2023*)
- Lack of study space

Safeguarding and Development

- Exposure to unsafe or unsuitable environments
- Long-term psychological impacts (*Children's Commissioner, 2019*)



3. Systemic Drivers

Key pressures driving the hidden homelessness crisis include:

→ **Chronic shortage of affordable housing**

(National Audit Office, 2023)

→ **High cost of nightly-paid temporary accommodation**

(Local Government Association, 2024)

→ **Rising homelessness demand**

Increasing pressure on already strained local authority resources

→ **Constraints on local authority capital investment**

Limiting councils' ability to fund long-term housing solutions

4. A Practical Solution: Modular Family Housing

4.1 The Core Model



Key Features

- ◆ Self-contained modular homes
- ◆ Located on council-owned land
- ◆ Affordable rent levels
- ◆ 10 year lease agreements
- ◆ Relocatable and reusable supporting circular economy and Net Zero targets

4.2 Evidence Base

Modular housing has been shown to:

- Reduce delivery time by up to 50% (*MHCLG, 2019*)
- Lower construction costs in certain contexts (*NAO, 2023*)
- Improve quality and consistency of housing provision

Examples include:

- London borough temporary modular housing programmes
- "Meanwhile use" developments on public land

5. Land Strategy

Suitable land includes:



Vacant Council-Owned Sites

Underutilised land already in public ownership, available for immediate meanwhile use deployment.




Brownfield Land

Previously developed land suitable for modular housing without impacting greenfield or protected areas.



Sites Awaiting Regeneration

Land in the pipeline for future development, usable in the interim to address urgent housing need.

 This aligns with government guidance on meanwhile use and public land optimisation (*Cabinet Office, 2020*).



6. Delivery and Funding Model

Lease-Based Delivery

- ♦ Fully funded
- ♦ 10 year + lease agreements
- ♦ No upfront capital for councils

Rent Framework

- ♦ Local Housing Allowance (LHA) aligned

Cost Efficiency

The National Audit Office (2023) highlights the escalating cost of temporary accommodation, supporting the case for alternative delivery models.

7. Policy Recommendations



Data Transparency

Improve reporting to reveal true scale

Modular Housing

Government / Planning Support for rapid deployment of units

Minimum Standards

Ensure self-contained family accommodation that is fit for purpose

These three recommendations form a coherent policy framework: better data reveals the true scale of the problem, rapid modular deployment addresses it at pace, and minimum standards ensure that no child falls through the classification gap again.

8. Conclusion & References

Conclusion

The latest data confirms a hidden but substantial population of children living in unsuitable conditions. Without reform, policy targets risk masking rather than solving the problem.

Relocatable modular housing provides a deliverable, scalable, and cost-effective solution that aligns with both local authority constraints and national policy objectives.

References

- Cabinet Office (2020). Public Land for Housing Programme Guidance.
- Children's Commissioner for England (2019). Bleak Houses: Tackling the Crisis of Family Homelessness.
- Department for Education (2023). Educational Outcomes of Disadvantaged Children.
- De Souza, R. (2026). Inside Housing commentary on temporary accommodation.
- Inside Housing (2026). Government publishes new data on hidden population of children in temporary accommodation.
- Local Government Association (2024). Temporary Accommodation Cost Pressures Report.
- Ministry of Housing, Communities and Local Government (2019). Modern Methods of Construction.
- Ministry of Housing, Communities and Local Government (2025). Temporary Accommodation Data Release.
- National Audit Office (2023). Homelessness and Temporary Accommodation in England.
- Public Health England (2018). Health Impacts of Poor Housing.
- The Homelessness (Suitability of Accommodation) (England) Order 2003.