

# Supported Housing Strategy: A Future Framework for Short Term Supported Housing

Pre-publication version

+ Document History			
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# Supported Housing Strategy: A Future Framework for Short Term Supported Housing

## Part 1 - Introduction

### Why we need a supported housing strategy

Supported housing provides crucial help to some of the most vulnerable people in our community. It can have an enormous positive impact on an individual's quality of life: from their physical and mental health to their engagement with the community and maintain their independence.

For some people, supported housing may be a long-term option as support needs are unlikely to change throughout the course of a lifetime. For others, supported housing may be a step along the way to fully independent living, for example for those recovering after a period of mental ill-health, or can form a vital part of a planned route into mainstream housing as part of the homelessness route. Through helping people to increase or maintain their independence, supported housing can also be a cost-effective way of supporting people, by reducing their future need for more intensive support, such as residential care or more expensive statutory services.

### What we mean by supported housing

Traditionally, supported housing has been primarily provided by the social housing sector managed and delivered by Registered Providers (RPs), local authorities and third sector community, voluntary or charitable providers, i.e., not-for-profit organisations.

Over the last decade, however, following a broadened definition of social housing and numerous changes in relation to governance arrangements of social housing, the numbers and types of providers in the sector providing supported housing have also grown. The broadened definition of social housing in 2016, governed by the Regulator of Social Housing (RSH), allowed RSH to award Registered Provider status to private sector 'for profit' organisations. These organisations now also make up part of the supported housing provision and represent a growing numbers of private sector organisations and landlords with RP status operating within the supported housing sector.

Supported housing is typically defined as housing designed to meet specific needs and in which there is some level of support provided as part of the accommodation offer. Within this there are broadly two categories of accommodation; Specialist Supported Housing and supported housing that meets a shorter-term need, often referred to as Transitional Supported Housing. Sheltered housing is the notable anomaly which is out of scope for this strategy.

Specialist Supported Housing is a specific type of supported housing defined in the Housing Rents (Exceptions and Miscellaneous Provisions Regulations 2016)<sup>3</sup> as specifically designed or adapted for people who require specialised services to enable them to live independently as an alternative to a care home, and where the level of ongoing support provided is approximately the same as that provided by a care home, for residents for whom the only acceptable alternative is a care home. It must be provided by a private registered provider under an agreement with a Local Authority or the NHS, and not receive any public assistance (also defined in the regulations) for its construction or acquisition. A further needs assessment and strategy for the specialist housing sector is planned for a later date.

Transitional Supported Housing is less clearly defined as a 'model' or indeed in terms of structure or dedicated funding. Its purpose, however, is to meet a shorter term need as individuals are supported in transition to longer term independent living.

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This strategy focuses on Transitional Supported Housing. This covers both accommodation with support that is commissioned by the Local Authority or other Statutory Agency (including Government funded) and non-commissioned supported housing.

This strategy does not include mainstream housing where floating or visiting support is provided. Although this is a vital part of the wider spectrum of support, it does not form part of the accommodation offer.

### The types of needs this strategy covers

There are many different types of households or communities of people who benefit from Transitional Supported Housing. With reference to Central Government's Supported Housing National Statement of Expectations (published October 2020), for the purposes of this strategy, these have been categorised into the following key groups:

- Young people leaving care, young people at risk and teenage parents
- People with experience of the criminal justice system
- People experiencing mental ill health, people with drug and alcohol dependency and people who have physical/learning disabilities that are below the threshold of care.
- People at risk of domestic abuse.
- Homeless people with identified other support needs, rough sleepers, refugees, and travellers.
- People with Multiple/complex needs

This strategy does not include older people or people with longer term or life-time support needs.

### Links to other strategies and plans

There is increasing recognition of the need for different agencies to work more effectively together around joint outcomes, and in particular strong links between health, social care, and housing to meet the holistic needs of citizens. Early intervention and prevention are at the core of our approach as it serves to reduce the overall need for services in the longer term.

This strategy therefore sits alongside a range of other local strategies and plans that seek to enhance the health, care and wellbeing of households needing support services to achieve and maintain independent living. These include:

- Birmingham Development Plan
- Health and Wellbeing Strategy
- Housing Strategy
- Homelessness Prevention Strategy
- Domestic Abuse Prevention Strategy
- Private Rented Sector Strategy
- Planning Policy

### Consultation

Consultation took place during September 2022.

This included

- National and Regional bodies
- Statutory and Strategic Partners
- Commissioned Providers
- Key Stakeholders
- Third Sector Providers
- Advocacy Services
- Service Users
- Public Consultation

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## Consultation Responses

The key finding from the consultation were:

- 78% respondents agreed with the vision
- Over 70% agree with the six strategic aims, with 43% strongly agreeing
- Majority agree with lobbying for legislative changes, national reform and funding for support – this is backed up by comments throughout the consultation
- 83% agree with rebalancing the provision of accommodation
- 94% agree with improved quality and oversight of support provision
- Nearly 70% agree with interim management measures
- There is a need for good quality and high standard accommodation with regulations and legislation
- Need to consider neighbourhoods and the impact and provide more support to resolve issues
- Funding is a key issue and needs regulation and enforcement
- Housing Benefits are a common theme and need to consider lack of progress on regulations
- Focus should be on people not money when providing support
- There is a lack of detail in some areas and it appears woolly for example move on proposals and narrative needed for framework on page 21 and what are the proposals to be piloted?
- It's about quality not quantity
- Need to be able to demonstrate progress of individuals and support needs to be tailored to individuals
- More detail needed around interim management measures backed up by longer term strategic plans
- Need to provide access to affordable, safe, sustainable and longer-term accommodation
- Accommodation and support must be person centred and not disadvantage vulnerable people
- Partnership working is important and further research and workshops with partners would provide more detail
- Will we have the funding and resources to deliver?
- Proposals for lobbying may need to be reviewed in light of draft Supported Housing Bill due in November
- Concern over number units needed as may leave 10,000+ people seeking alternative accommodation

Additional comments received related in the main the procedural or implementation matters.

## Methodology

This strategy has been developed using the associated Supported Housing Needs Assessment, the findings from a survey issued in December 2020 to all current providers of supported Housing in Birmingham, Birmingham's Overview and Scrutiny Inquiry, experience gained from partaking in the government Supported Housing Overview Pilot and the subsequent government evaluation of the five Supported Housing Oversight Pilots.

Developmental input through the formation of a stakeholder reference group. The stakeholder reference group comprised a mix of provider perspectives – including commissioned providers, non-commissioned providers, Registered Providers of Social Housing, non-Registered Providers, 'traditional' Registered Provider and leased-based only Registered Provider. This accommodated views of a broad range of organisational experts by experience.

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## Part 2 - Current Provision - A broken System

### Background

Birmingham has circa 21,317 (14<sup>th</sup> June 2021) units in use as Transitional Supported Housing. The sector has grown rapidly. Almost doubling in size in the previous 3 years. There have been no real national comparators in terms of size and as such, Birmingham has been viewed both locally and nationally to be an outlier in terms of the size of this sector. There is however, mounting evidence that indicates growth is now spreading regionally and an expectation that, without fundamental reforms, national growth is inevitable.

‘Exempt sector’ has become the common term used to describe supported housing as the vast majority of supported housing is funded through exemptions to the capping of housing related costs set out in Housing Benefit regulations – hence the term ‘exempt’.

The costs associated with delivering supported housing are in two very distinct parts. The costs relating to the housing and service charge element and separately the costs for delivering the support. Housing Benefit funds the housing costs only. Funding for the provision of support must be found from elsewhere.

In Birmingham some of this support is commissioned using Council budgets and a small proportion in the City is funded through the voluntary sector. The Provider Survey returns indicated that a significant proportion of support delivered is self-funded from an individual’s personal income.

Where support has been commissioned by the Council provision is referred to as ‘commissioned supported housing’. Where the support has not been commissioned it is referred to as ‘non-commissioned supported housing’. The ‘Exempt Sector’ in the city therefore comprises commissioned supported housing and non-commissioned supported housing.

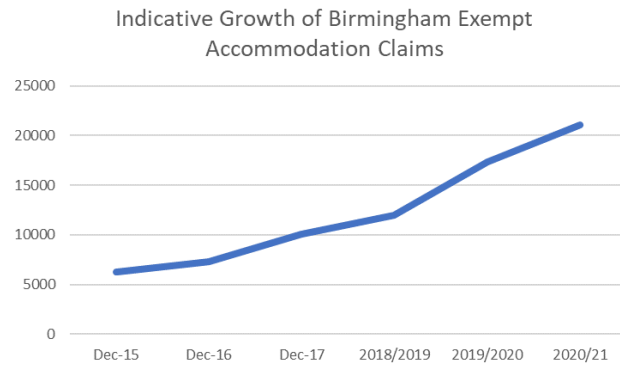
### Growth

Rapid growth in Birmingham has been within the non-commissioned segment of the Transitional Supported Housing sector and this can be attributed to a number of factors:

- The roots of the growth go back to national disinvestment and deregulation. Reduction in budgets for key vulnerable groups, such as substance misuse, mental health, people with experience of the criminal justice system and the removal of the ring fence for Supporting People funding, coupled with a reduction in regulatory powers, resources and agencies has led to the residual sector being left to explore how best to meet the demand that was still there and has grown. The lack of national guidance and loose and disjointed regulations has made it easy to enter the market and meet minimal threshold requirements and standards. The Local Authority has no controls within the market.
- Birmingham has a large private rented sector and a stock profile which lends itself to house conversions to shared accommodation. As a business model this presents greater financial gains.
- Structural issues within the housing sector in the city, particularly pertaining to single person accommodation. Access to social housing is limited. The Local Housing Allowance Shared Accommodation Rates are low, rendering much of the general needs private sector inaccessible to many on low incomes. Housing options for low income, single person households are therefore extremely limited – ‘pushing’ people into supported accommodation as their only option. The threshold for demonstrating a support need within Housing Benefit regulations is low.

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Indicative growth using figures from multiple sources, local (Revenue and benefits service and commissioned accommodation), national (DWP, Freedom of Information Requests), provide proxy measures of this growth on the numbers of exempt accommodation claims (figure right).



## Birmingham's Supported Housing Provision - Sector Profile

### Source Data

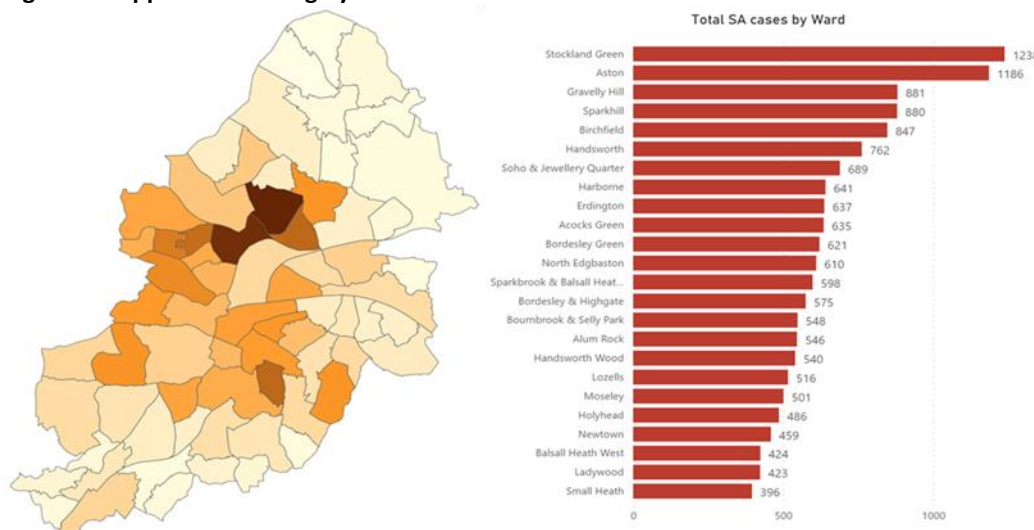
Quantitative multi-source data analysis held across Council systems have been used to inform an analysis of the sector. This has been supplemented by the findings from a survey issued to all Supported Housing Providers in the City in December 2020.

### Locations, concentrations and property.

There are circa 21,317 units of supported accommodation in scope as at June 2021.

Ward level data mapping (figure x below) shows supported housing concentrations and specific locations across the city. These correspond with parts of the city where there are high volumes of accommodation types which lend themselves to multiple occupancy upon conversion within the traditional rented sector housing markets. These are large family-size houses in relatively lower property value areas compared to other parts of the city with similar property types.

**Figure 1: Supported Housing by Ward**



The wards with the highest concentrations are:

- Stockland Green - 1,238 units
- Aston - 1,186 units
- Gravelly Hill - 881 units
- Sparkhill - 880 units
- Birchfield - 847 units

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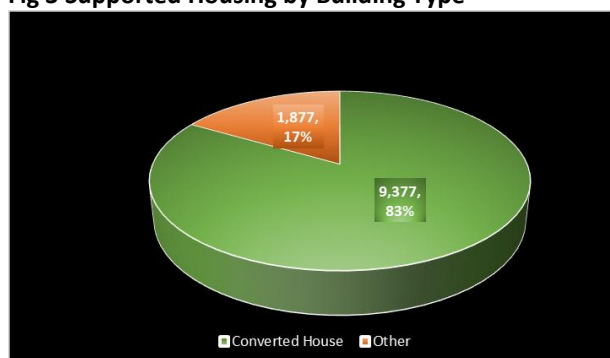
Whilst there is a mixed type of supported housing provision, the Provider survey indicated most of the supported housing is shared accommodation. The survey provided a sample equating to 53% of the total provision in the city and indicated that 79% is within shared dwellings, 47% of which is within properties with 5 or fewer households sharing and 32% in dwellings with more than 5 households sharing. A small proportion, 11% combined, is either fully or partially self-contained.

**Figure 2:** Supported Housing Survey Findings on Accommodation types

Accommodation Type	Number	%
Fully self-contained	854	8%
Shared 1-5 rooms	5275	47%
Shared 6 rooms and over	3546	32%
Hostel	1285	11%
Partially self-contained (En-suite bathroom)	289	3%
Number of responses Received	11,249	

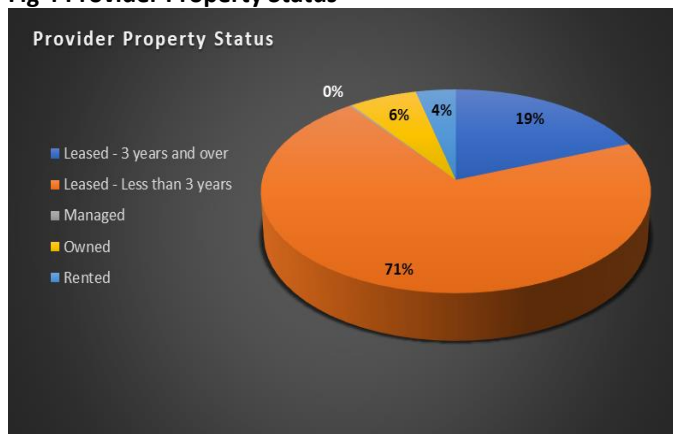
The responses from the Provider survey indicated 83% of supported housing provision is in converted houses.

**Fig 3 Supported Housing by Building Type**



Providers were also asked about the status of the property in use for supported housing.

**Fig 4 Provider Property Status**



At 90%, the vast majority of properties in use are leased by the provider.

Most, 71%, have a lease arrangement of less than 3 years.

A small proportion, at just 6%, are owned directly by the provider.

In summation the provider survey results indicated most supported housing is comprised of shared accommodation within converted houses. Most with short-term leasing arrangements. In terms of



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the sector, this could lead to high levels of instability as the long term sustainability of the housing offer is uncertain. If ownership and leased arrangements over 3 years are taken collectively, longer terms arrangements exist within a quarter of the sector only.

### Occupancy

The survey of Providers indicated that most occupants (44%) had lived in their property for less than 12 months. A small proportion of occupants had resided in their accommodation for over 3 years.

**Fig 5: Occupancy Periods**

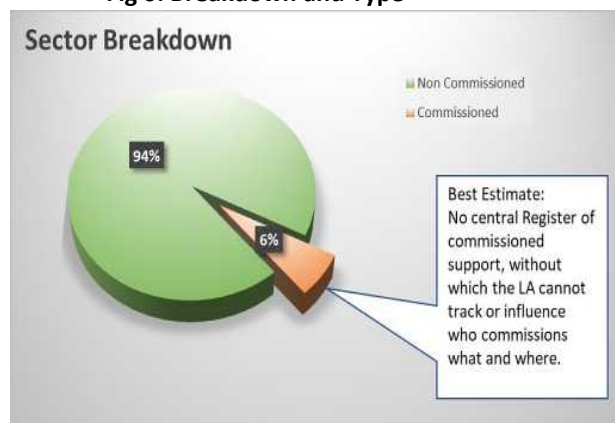
		Number	Percentage
Length of Stay	Between 1 year and 2	1,239	28%
	Between 2 years and 3	239	5%
	Less than 12 months	1,947	44%
	More than 3 years	541	12%
	Unoccupied	457	10%
		4,423	
Percentage of In Scope Provision		21%	

### Who is providing Support and Housing

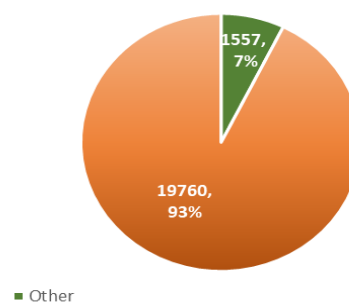
The vast majority of Transitional Supported Housing is delivered by non-commissioned Providers. This is estimated at circa 20,000 units, or 94% of the sector.

19,760 units equating to 93% of in scope provision is provided by Registered Providers of social housing.

**Fig 6: Breakdown and Type**



**In Scope - Provider Type**



### Regulatory Oversight

#### Regulator of Social Housing

Of the in-scope provision 93% (19,760 units) is delivered by Registered Providers. Of this provision it is estimated that 65% of it has been designated as non-social housing, which means it is effectively private sector provision.

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The Regulator of Social Housing (RSH) is therefore the primary regulator of this sector. RSH provides assessments and Regulatory Judgements, mainly concern the Registered Providers governance and financial viability against a set of Regulatory Standards.

The Regulatory Status of Registered Providers delivering supported housing in Birmingham is as follows:

- 85% of the provision is known to be in regulatory difficulty. Either assessed by RSH as Non-Compliant or where a Grading Under Review (GUR) has been issued for serious regulatory concerns.
- 7% of provision is known to be compliant with RSH standards.
- 7% of provision has no regulatory judgement.

In addition to its Governance and Financial Viability Standards RSH also measure against the Rent Standard, Decent Homes Standard, Tenancy Standard, Consumer Standard, and a Value for Money Standard. However as at least 65% of the provision is designated as non-social housing. These standards cannot be measured or enforced by RSH, leaving a significant regulatory gap

### Central and Local Government

Central Government oversight of the provision and funding of supported housing is disjointed. The administration of Housing Benefit, which largely funds the housing costs rests with the Department of Works and Pensions (DWP). Funding for support and the provision of housing rests with the Department for Levelling Up, Housing and Communities (DLUHC). Despite being a major player within the national housing sector, the Regulator of Social Housing does not fall within the remit of DLUHC but is responsible directly to Parliament. There is not one organisation therefore that provides overarching direction or oversight.

Fig 7: Regulation Web



Local Authorities have no control over the growth, location or type of accommodation that enters or leaves the sector. The mixed sector profile dominated by leased accommodation with large property numbers anchored within the private sector together with the levels of non-commissioned support provision renders this unachievable under current arrangements.

In terms of support provision, where this has been commissioned by the Local Authority or other statutory commissioning body, oversight of the support provision is in place. This extends to controlling costs, setting standards, ensuring the adequacy and appropriateness of support, ensuring safeguarding processes are in place, delivery monitoring and measuring outcomes. This, however, covers a relatively small part (estimated at 6%) of the overall provision.

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There is no regulatory oversight of non-commissioned support. This means that there are no corresponding assurances and monitoring of safeguarding procedures, staffing levels, project aims and outcomes, and no formalised assessment of the adequacy, suitability or appropriateness of the support provided.

### Legislation

Whilst Housing Benefit Regulations, to an extent, regulates property costs (rents and eligible service charges) they do not, in themselves, consider the suitability or adequacy of the 'care, support or supervision' for an individual claimant. These regulations do not examine, or account for the capacity of the provider, the standard of accommodation or any associated effects on risk or wellbeing from a claimant's living environment. The Regulations also do not define what is meant by 'care, support or supervision' or the threshold for meeting such requirements other than 'more than minimal' or 'more than trifling' which has been established through tribunals.

Shared accommodation operated by Registered Providers are not classed as HMOs in Housing Legislation and are not subject to legislation governing HMO provision. Therefore, the majority of supported housing provision in the city is operated by Registered Providers who are exempt from statutory licensing conditions (Housing Act 2004, Schedule 14) which also includes any additional or selective licensing a local authority may adopt.

Shared accommodation delivered by Registered Providers are also exempt from the Management of Houses of Multiple Occupation (England) Regulations 2006, which governs the way such premises are managed.

Properties which are controlled by Registered Providers and accommodate between 3 to 6 people are not identified as a HMO. This means they can change from a family house to a shared house for up to 6 people without requiring planning permission. However, planning permission is required to change from a family house to HMO for 7 or more people (Sui Generis Use) regardless of who controls or manages the property.

All properties will be subject to the Housing Health and Safety Rating System (HHSRS) which governs minimum property-related safety standards, and any reported breaches of health and safety or disrepair.

### Other

To a lesser extent other interested parties include the Charities Commission, the Financial Conduct Authority and the Care Quality Commission. These organisations can have some degree of oversight in regards specific elements of the provision and may overlap with the other broader

Form of regulatory oversight. This can add a further layer to the disjointed and complex oversight arrangements.

### Operating Model

#### Oversight

The sector has seen the emergence and growth of Registered Providers who are operating a 'lease-based model' of provision. This type of provider exclusively uses a leasing model, leasing their units from the private rented sector, and operating what can be termed an 'umbrella' form of governance and control, with several managing agents underneath the Registered Provider.

Lease-based Registered Providers are, arguably, not aligned with the traditional perceptions of 'social landlords' or 'housing associations' and notably at least 65% of their provision has been designated as private sector housing.

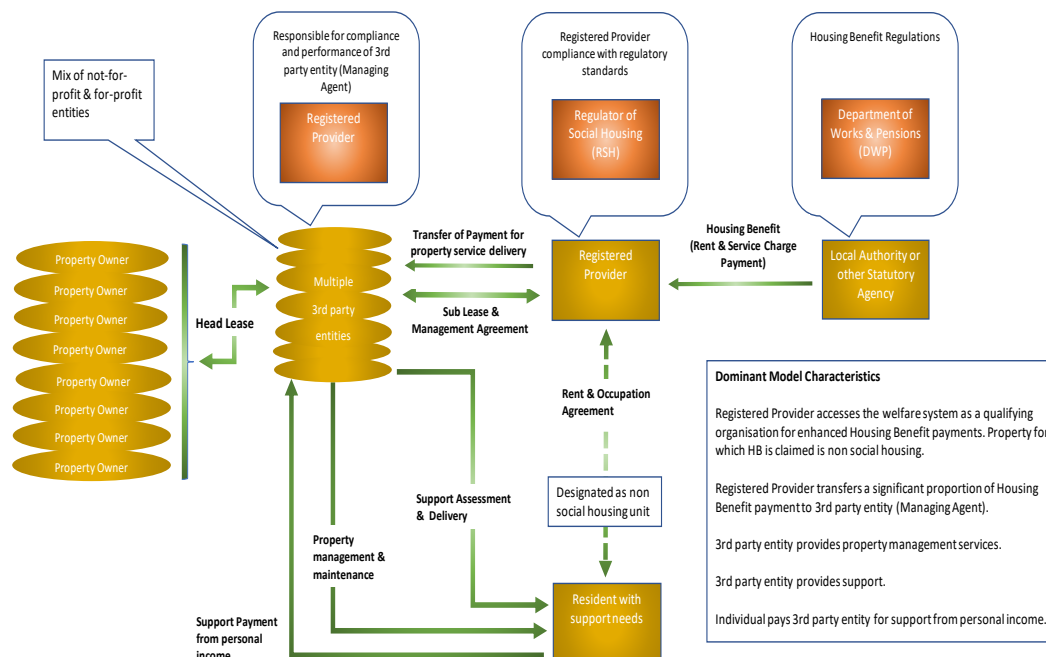
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Subsequently, a large and complex network of more than 100 providers with varying operating arrangements sit within the sector. There is also a heavy reliance on private sector accommodation leased to Registered Providers for the provision of supported accommodation.

Through the publication of RSH Regulatory Judgements, most notably during 2021, and insights gained through the Provider Survey conducted in late 2020, common characteristics in operating models have emerged as illustrated below

**Fig 8: Dominant Operating Model (see appendix 1 for version)**

Dominant RP Operating Model - Common Characteristics



In the dominant operating model Registered Providers access the welfare system as a qualifying organisation for enhanced Housing Benefit payments. The property for which the Housing Benefit is claimed may not be social housing. Registered Providers transfer a significant proportion of Housing Benefit payment to 3rd party entities, commonly termed the Managing Agent. In the main, the 3rd party entity provides property management services. The enhanced Housing Benefit funds the property costs.

The 3rd party entity can also provide support for which the individual resident is charged and pays the 3rd party entity for this support from personal income. In essence, the support is self-funded by the individual.

### Impacts for the Client

- In the absence of central or local government funding, vulnerable groups are paying for their own support from personal income. There are no other examples within the welfare system where vulnerable groups are required to fund services without there being testing of means to pay. As these vulnerable groups have a limited income this can potentially push them into destitution.
- Higher rent levels present a barrier to employment, trapping vulnerable groups in poverty/destitution.

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- Individuals reside primarily in shared accommodation with no influence over who the other occupants are.
- Anecdotal evidence and reported stakeholder experience points to vulnerable groups 'churning' around the sector as it is difficult to exit due to lack of alternatives.
- Compliance with Regulatory Standards is poor and regulatory oversight is weak. There can be little recourse therefore regarding either property standards or the quality and/or appropriateness of the support delivered.

### Impacts for the Local Authority

Within the current national framework, the Local Authority has no influence over entry, expansion or exit from the sector therefore, cannot influence numbers, location, or density of provision. Supported housing providers have no strategic obligation to the Local Authority and are free to provide supported housing units providing Housing Benefit regulations are met.

The Local Authority has no influence over the myriad of untracked referral routes, or the type or intensity of support required. This presents not only issues in terms of the impact on vulnerable communities, it presents an inability for the Local Authority to configure and fund broader support and infrastructure services locally.

The provision is exempt from licencing. Exempt from planning permissions (properties which are controlled by Registered Providers and accommodate between 3 to 6 people are not identified as a HMO. This means they can change from a family house to a shared house for up to 6 people without requiring planning permission. However, planning permission is required to change from a family house to HMO for 7 or more people) regardless of who controls or manages the property. Exempt from local rent limits and the Local Authority has no means of ensuring Central Government's National Statement of Expectations is met.

The Local Authority has no direct influence on standards and faces extreme challenges in resourcing effective scrutiny for over 20,000 units.

### How Supported Housing is funded Housing

Following national proposals to reform the funding of supported housing, in August 2018 Government announced that all supported housing funding would be retained within the welfare system. Supported housing is therefore effectively covered by the payment of Housing Benefit.

There are two elements to the funding of supported housing: the housing costs and the support costs. It is widely accepted that the housing costs are higher for supported housing than for general needs mainstream housing. Housing costs relate to rent and service charge costs. For supported housing there is an additional provision within Housing Benefit, an uplift or enhancement, to cover the additional housing costs which are associated with supported housing. This funding model is built upon an assumption that the delivery of the required support is funded from elsewhere.

Therefore, rent and service charges are funded through the welfare system via Housing Benefit. Other support needs costs are not.

### Support

In terms of funding to meet other support needs, in Birmingham a relatively small proportion, of support is funded through Local and Central Government funding.

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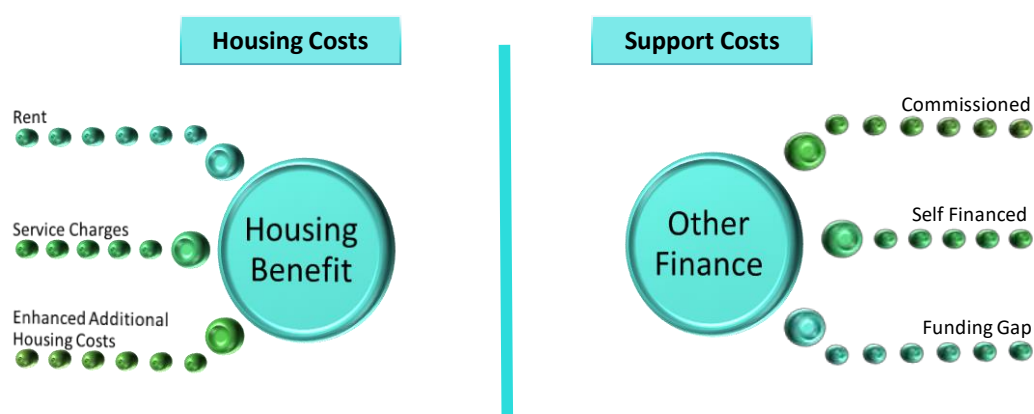
A significant portion of the current supported housing provision does not come through commissioned funding. This applies to 94% of the sector. The provider survey indicated that in most cases (83%) a resident personal charge is applied to cover the cost of support.

Fig 9 Provider survey response regarding support funding

Support Charge Type	Number	Percentage
Commissioned	1,171	12%
Personal Charge	8,001	83%
Charity/Voluntary Orgs	478	5%
Other	1	0%
	9,651	
Percentage of In Scope Provision	45%	

Based upon the most common weekly charge identified within the Provider Survey, it is estimated that an annual charge of **£14.2m** is being passed to vulnerable citizens within Birmingham to help fund their own support.

Fig 10 Current funding arrangements



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## Part 3 Associated Undertakings

### Central Government – Supported Housing Oversight Pilots

#### Background

In response to growing national concerns that some supported housing is of poor quality, both in terms of accommodation standards and the level of support provided the Department for Levelling Up, Housing and Communities (DLUHC) invited five local authorities (Birmingham, Blackburn, Blackpool, Bristol and Hull) to participate in the Supported Housing Oversight Pilot.

Each local authority submitted a proposal to DLUHC to outline the activities to be undertaken in their area, with funding granted by DLUHC based on the nature and scale of pilot work and challenges in the local market.

In Birmingham the pilot set out to deliver the following objectives:

1. Improve the quality and standard of exempt accommodation in Birmingham through the rollout of the Birmingham Quality Standard and a multi-disciplinary team who will undertake a regime of inspections
2. Ensure citizens are safeguarded and supported to effectively build their capability and autonomy.
3. Empower citizens living in exempt accommodation through effective communication and roll out of the charter of rights developed by Spring Housing.
4. Co-design a partnership led strategic plan for the use of exempt accommodation in Birmingham.
5. Investigate and prosecute Organised Crime Groups in the exempt accommodation sector as part of a partnership commodity-based approach
6. Undertake an evaluation of effective interventions and initiatives.

#### Birmingham Pilot

Birmingham began this pilot work in November 2020 using funding from DLUHC to set up new multi-disciplinary teams to improve inspection, enforcement and oversight and roll out a new Birmingham Quality Standard and Charter of Rights to drive up property and support standards.

Findings from the Birmingham Pilot undertakings include:

- Property standards inspections using the Housing, Health & Safety Rating System (HHSRS) found:
  - 2545 Category 1 hazards (those where the most serious harm outcome is identified – risk to life, fire, damp and mould, asbestos)
  - 1465 Category 2 hazards (If a hazard is less serious or less urgent)
- Supported Housing Inspection and Social Care teams found evidence of:
  - Poor levels of support and training among providers.
  - Registered Providers were often not aware of the poor standard of support being provided through their managing agent arrangements.
  - Support may be provided 'more than minimally' but it did not necessarily meet the needs of the citizen.
- Poor provision is leading to further community safety issues, and there is a significant issue around Anti-Social Behaviour, with over 70% of complaints having an element of this.



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- Evidence of Organised Criminality, including Drug Dealing/Supply/Cultivation, Sexual Offences; Fraud (Ghost Tenants, Fraudulent Claims); Weapons (Firearms, Bladed Articles); Gang Affiliation (Members of Gangs residing together and breaches of conditions).
- As part of the investigations there have been 170 evictions/removal of tenants, 1 closure order, 16 Community Protection warning, 24 properties which are decommissioning, and 20 arrests by West Midlands Police. 336 properties have been offered advice to improve their ASB policy or to improve relationship building with residents, signposting tenants to further support.
- For some areas of the City where there is a higher concentration of non-commissioned supported accommodation, there is a detrimental effect on the local neighbourhood with higher levels of drug use, criminality and anti-social behaviour.
- There is no national quality standard for supported accommodation but in Birmingham, working with the Birmingham Voluntary Sector Council (BVSC) we have developed a standard which is rolling out alongside a new Charter of Rights for tenants to support work with registered providers to improve quality. Take up is improving slowly, with 70 out of 148 providers signed up to the Charter of Rights. 30 providers now actively going through the Quality Standards assessment process, but many are failing to engage, and the local authority has a lack of power to enforce this. 9 providers are nearing the end of the assessment stage but have not yet been awarded the Quality Standard. Several providers have current regulatory judgments from the Regulator for Social Housing regarding their financial and governance arrangements. In these cases, they are still able to sign up to the Quality Standards, but any award will be suspended for one year.
- Some providers of supported housing are openly advertising on social media and through letting agents to fill supported housing accommodation. This is leading to the continued growth which is being seen in the city.

### National Pilots Evaluation

On behalf of DLUHC, Kantar Public undertook an evaluation of all the Pilots. Kantar Public, whilst concentrating their lessons learned on pilot implementation findings made the following recommendations regarding oversight and regulation.

- A. Make short medium term funding available to local authorities to oversee supported housing in their area while longer term reforms (e.g., regulatory and legislative measures) are agreed and implemented.
- B. DWP should aim to define care, support and supervision, and review regulations around rent levels and subsidy, to strengthen the impact of Housing Benefit scrutiny activities open to local authorities.
- C. Strengthen local authority powers to support them to intervene in new supply where it is unnecessary or poor quality.
- D. To improve the quality of support residents receive in supported housing, DLUHC and DWP should review funding and regulation for the support element of supported housing
- E. DLUHC could support local authorities to maintain property quality and standards through dissemination of learning and clarifying the Housing Health and Safety Rating System (HHSRS) standards.
- F. Local authorities should be encouraged to conduct their own data collection and modelling to improve their future strategies for their local supported housing market, and DLUHC's own understanding of how to improve the wider supported housing sector.
- G. Government should revisit pilot value for money calculations to understand whether advantages gained from pilot activity remain over time.



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- H. Local authorities looking to adopt activities from the pilots should adopt multi-disciplinary and partnership approaches, plan resource carefully and actively share information and learning.

### Overview & Scrutiny Inquiry

In late 2021 Birmingham undertook its own public inquiry into Supported (Exempt) Accommodation and has published an Overview & Scrutiny Committee report. The associated call for evidence noted an unprecedented number of responses, indicative of the strength of feeling generated by this issue.

Many of the responses received came from active citizens, engaged in community or residents' associations. Others came from residents prompted by concerns about their local areas.

The inquiry noted the following issues:

- The growth and disproportionate concentration of exempt (supported) accommodation in certain areas of the city.
- The impact of this growth and concentration on those local communities.
- Recognition of the need for good exempt (supported) accommodation for vulnerable citizens; many respondents expressed concern about the welfare of residents and the level of support received.
- Acknowledgement of the lack of regulation and checks, which has led to the poor quality of some of the exempt(supported) accommodation in the city and the poor competency of landlords, many of whom live outside of the city but nonetheless may generate significant income.
- Concerns about the cost of responding to these issues on the public purse.

The inquiry made the following recommendations:

- To build upon the Supported Housing Oversight Pilot.
- To Ensure Council-wide Practice is consistent with the aims of the Charter and Supported Housing Strategy.
- Supporting the Housing Benefit Process.
- Strengthening Planning Controls.
- Working with Regional Partners and other Local Authorities to prevent/reduce 'lifting and shifting' of vulnerable adults from elsewhere in the country.
- Lobbying for national change.

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## Part 4 - Needs and Demand

### Estimates by Segmentation of Need by Client Group Clusters

Assessing supported housing needs is a complex undertaking. The Supported Housing Needs Estimate conducted in support of this strategy has drawn data from numerous sources across the housing, health and social care sectors which can all provide reliable secondary data at national levels, with diminishing levels of granular detail when geographical local level needs information is being sought.

To this end the process of assessing supported housing needs should be treated as a dynamic exercise, identifying and incorporating newly available datasets for each of the client group clusters to update the figures below.

The figures below provide a range of demand with an upper estimate figure. A number of variables have been considered including:

- A baseline of need established from existing council commissioned supported housing.
- Incidence rates in homelessness and temporary accommodation populations from local authority housing options service data covering the last 2 years.
- The current overall profile of supported housing provision in Birmingham.
- Population projections for the NSE cluster groups using secondary data compiled by Oxford Brookes University which combines ONS population and Department of Health - this indicates needs overall which increase by 1.05% every five years.

Client Group Cluster	Estimate Need Units	% of Overall Need	Upper Limit Estimate
Young People including Care Leavers	1535	18.05%	1850
People with experience of the criminal justice system	805	9.47%	1100
Mental ill Health	1645	19.34%	2025
Learning Disabilities	275	3.23%	380
Homeless with support needs	2030	23.87%	2550
Physical Disabilities	530	6.23%	600
Domestic Abuse	1355	15.93%	1550
Substance Misuse (SM) or Alcohol Dependency	330	3.88%	400
<b>Estimate of Total Local Supported Housing Need</b>	<b>8,505</b>		<b>10,455</b>

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Translating this into the identified client cluster groups as set out in central Governments National Statement of Expectations

Client Group Cluster	Estimate Need Units	Upper Limit Estimate	% of Upper Level Estimate
<b>Cluster 1</b> Young people leaving care, young people at risk, and teenage parents.	1535	1850	17.7%
<b>Cluster 2</b> People with experience of the criminal justice system.	805	1100	10.5%
<b>Cluster 3</b> People experiencing mental ill health, people with drug and alcohol dependency, physical/learning disabilities that are below the threshold of care.	2780	3405	32.6%
<b>Cluster 4</b> People at risk of domestic abuse. Homeless people with identified other support needs, rough sleepers, refugees, and travellers.	3385	4100	39.2%
<b>Cluster 5</b> Multiple/complex needs.	Isolated data not available	Isolated data not available	
<b>Estimate of Total Local Supported Housing Need</b>	<b>8,505</b>	<b>10,455</b>	

Current data sources include complex support needs within the other cluster groups. At this point therefore it has not been possible to isolate the need however the bottom-line estimates are not affected.

### Levels of support Provided.

The survey conducted amongst current providers asked for assessments in terms of the current levels of support provision. A sample covering 51% of the current provision revealed the following:

Support Level Definition		%
Level 1	Commissioned level complex needs support. Typically 9 hours support needed per week per client. Clients will typically experience chaotic lifestyles and social exclusion with multiple support needs covering housing, health, well-being and financial services.	2.7%
Level 2	Commissioned level support needs. Typically between 6 and less than 9 hours of support needed per week per client. Support needs will include a combination : housing, health , well-being and financial services	8.8%
Level 3	Below commissioned level support needs. Typically between 2 and less than 6 hours of support needed per week per client. Support needs will include a combination : housing, health , well-being and financial services	18.5%
Level 4	Minimal but multiple support needs. Typically less than 2 hours per week. Support needs will include a combination : housing, health , well-being and financial services	69.7%
Level 5	Housing related support. Requires support with stabilising, maintain or accessing new accommodation. No other support needs	0.3%

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This translates across the estimated needs levels as follows:

Support Level Definition		%	Lower Limit Estimate	Upper Limit Estimate
Level 1	Commissioned level complex needs support. Typically 9 hours support needed per week per client. Clients will typically experience chaotic lifestyles and social exclusion with multiple support needs covering housing, health, well-being and financial services.	2.7%	230	282
Level 2	Commissioned level support needs. Typically between 6 and less than 9 hours of support needed per week per client. Support needs will include a combination : housing, health , well-being and financial services	8.8%	748	920
Level 3	Below commissioned level support needs. Typically between 2 and less than 6 hours of support needed per week per client. Support needs will include a combination : housing, health , well-being and financial services	18.5%	1,573	1,934
Level 4	Minimal but multiple support needs. Typically less than 2 hours per week. Support needs will include a combination : housing, health , well-being and financial services	69.7%	5,928	7,287
Level 5	Housing related support. Requires support with stabilising, maintain or accessing new accommodation. No other support needs	0.3%	26	32

### Summary of Need

- The upper estimate level indicates a need for 10,455 units of supported housing. This is estimated to rise by 1.05% over 5 years. This estimates a rise to 10,564 by 2027.
- Cluster 4, People at risk of domestic abuse. Homeless people with identified other support needs, rough sleepers, refugees, and travellers represent the main need group at 39.2%.
- The vast majority of support needs exist at the lower end of the spectrum (70%) with individuals typically requiring support of 2 or less hours per week.

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## Part 5 - Projections and Gaps

### Provision

Based upon current projections there is a significant over-supply of supported housing in the city. Based upon upper level estimates of 10,564 by 2027 this over-supply is currently circa 50%

Having twice as much supported housing as is needed for the city suggests:

- Large numbers are imported from the region and nationally.
- The supported housing option is filling the gap for other critical shortages of affordable housing, particularly the acute shortage of general needs accommodation for single adults.

### Projected Funding Needs

Contained within separate impact assessment, to follow.

## Part 6 - The Way Forward

### Supported Housing Vision

#### Our Vision Statement

*Within a reformed national framework, offer supported housing through partnership with Health, Housing, Social Services, the Probation Service, and the voluntary sector that meets the estimated needs for the city.*

Our Vision for Supported Housing in Birmingham is informed by two key factors. Firstly, to ensure the right supported housing options are available at the right time and in the right place for those that need it. And secondly, appropriate and dedicated funding is available in order to deliver the support needed.

Supported housing is also part of the broader housing offer in the city and in Birmingham the significant over-supply of supported housing is impacting upon and reducing other affordable housing options in the city. Our vision therefore is to reach a reduced number of supported housing units which better reflects the estimated needs of the City, whilst ensuring that wider housing need as required is met.

Significant national reforms are needed in order to achieve this. Without national reform the local Authority is limited in what it can achieve in terms of strategic outcomes, market changes or standards within supported housing. National Reform is therefore essential.

#### Strategic Aims:

- Reduce the current over supply of supported housing.
- Improve the quality, oversight and funding of supported housing provision.
- Encourage independent living.
- Help to sustain communities.
- Have a positive impact on the health and wellbeing of individuals.
- Respond effectively to the needs of a highly diverse community.

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## Strategic Priorities:

We will progress this Vision over the next five years through 4 strategic Priorities:

- Lobbying for Legislative changes, national reform and funding for support.
- Rebalancing the provision of accommodation by reducing the number of supported housing units.
- Improved quality and oversight of support provision.
- Interim Management Measures.

### Priority 1: Lobbying for Legislative Changes, National Reform and Funding

Without national reform the local Authority is limited in what it can achieve in terms of strategic aims, market changes or standards within supported housing. The Council welcomes the Department of Levelling Up, Housing and Communities statement of March 2022 in which the Government has announced its intention to develop and consider both shorter and longer term measures as part of a Supported Housing Improvement Programme.

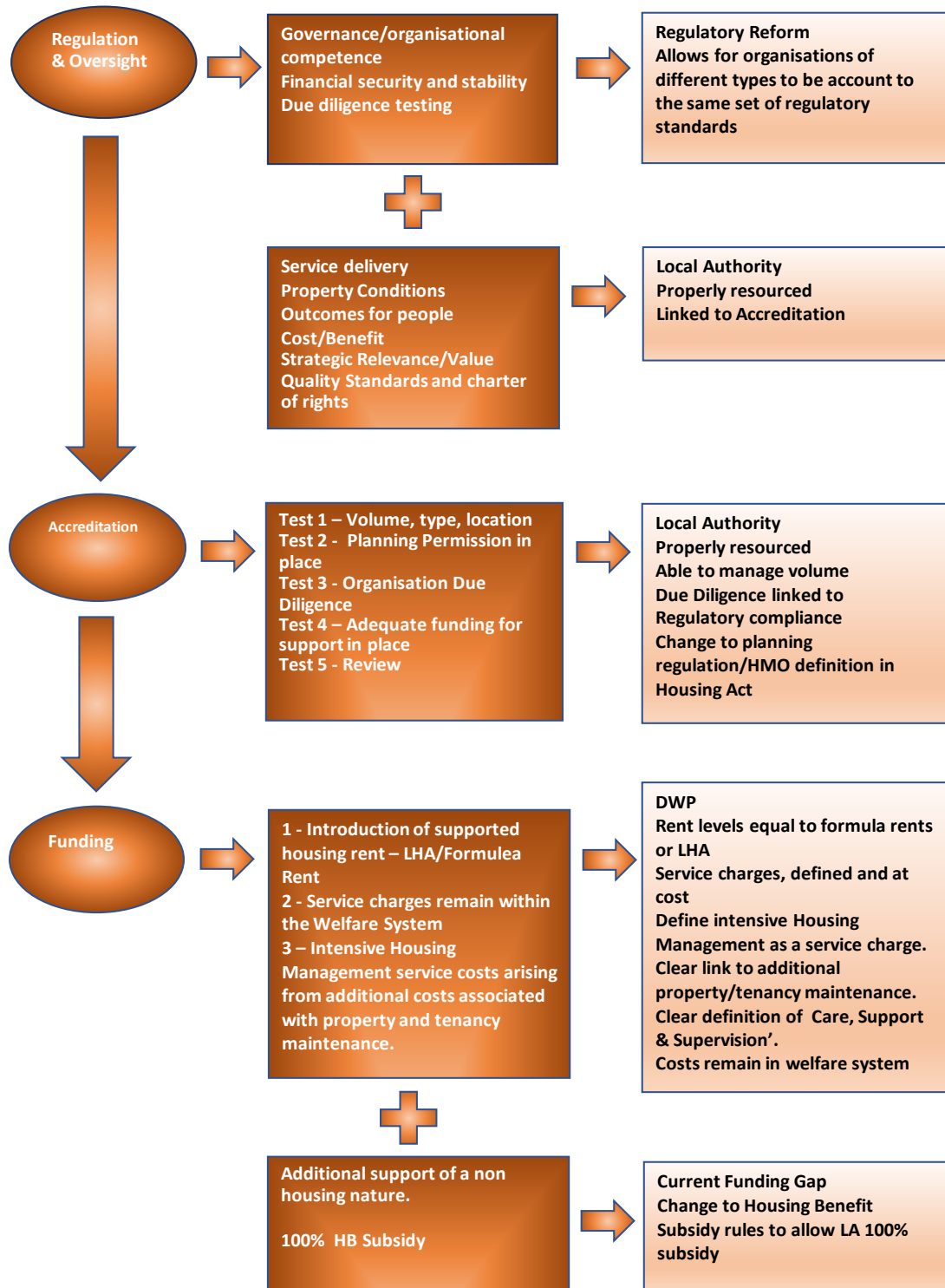
In order to meet this priority, the Council will:

- 1) Develop a proposed framework for national reform based upon the fig 11. A reform framework requires changes to regulation and oversight, the introduction of Local Authority accreditation and a clearer, strengthened, reformed funding model. (See also framework interdependencies (figure 12))
- 2) Work with Central Government in order to implement the necessary reforms including an offer to pilot these proposals.
- 3) Work with Central Government in order to obtain dedicated funding to bridge the current funding gap, including funding for support.
- 4) Work with Central Government in order to develop priority shorter term changes as part of the Supported Housing Improvement Programme. Shorter term priorities will include, improving standards, developing greater Local Authority powers to influence supply locally and a review of Housing Benefit Regulations.
- 5) Work with Central Government in developing the longer-term measures required as part of the Supported Housing Improvement Programme.

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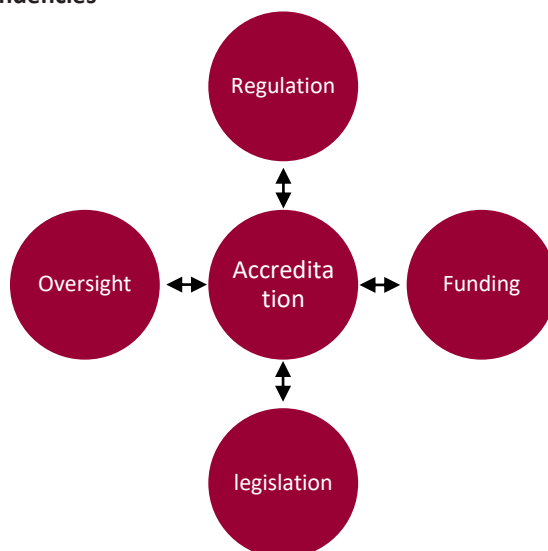
Fig 11 Supported Housing Reform Framework

## Supported Housing – Reform Framework



## Supported Housing Strategy: A Future Framework for Short Term Supported Housing

Fig 12 Framework Inter-dependencies



### Priority 2: Rebalancing the provision of accommodation

The supported housing estimate indicates the need to reduce the current supply by approximately 50%. A reformed framework is required in order to achieve this. Without national reforms the Local Authority is unable to exercise the required influence to do this.

Within a reformed framework the rebalancing of provision will consider numbers, location and type of accommodation. In order to meet this priority, the Council will:

1. **Numbers.** Within a reformed framework this will be achieved through a phased shrinkage in the number of units provided over a 5-year period.
2. **Location.** Within a reformed framework Birmingham can exert greater influence over the geographical locations to provide greater locality choice, reducing neighbourhood saturation and the impacts associated with this.
3. **Type of Accommodation.** Within a reformed framework, where feasible Birmingham will seek a transition from the over reliance on the shared housing model.
4. Review and adjust in accordance with impact assessments, risk management and changing needs. The landscape in which supported housing operates is constantly moving and any decisions to decommission will be subject to regular review of the needs assessment and a full risk assessment of the impacts including an assessment of market opportunities.

### Priority 3: Improved quality and oversight of support provision.

The Council requires the powers to properly oversee standards both in terms of support delivered and property conditions. Additionally, the Council should have oversight on the outcomes delivered for citizens, the cost benefits, value for money and the continued strategic relevance of provision, built upon strong resident engagement and participation.

In addition, accreditation is essential in order to allow Local Authorities the discretion to manage volume, neighbourhood placement and the types of provision within the Local Authority area. And secondly the organisational fitness of those providing. The requirement to be accredited in order to provide supported housing needs to be set at a national level with the flexibility for individual local authorities to develop accreditation schemes tailored to local needs and markets.



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In order to achieve this priority, the Council will:

1. Seek the necessary national reforms to enable greater regulation and oversight.
2. Develop and introduce a full accreditation scheme, requiring providers of supported housing to be accredited by the Council to provide supported housing within the Local Authority area.
3. Seek the necessary dedicated funding in order to resource greater regulation and oversight.

### Priority 4: Actions Arising from The National Oversight Pilot

The Council recognises that national reform is both challenging and longer term. In the interim therefore the Council will apply a series of measures to manage the current over-supply of supported housing.

The Council will achieve this through:

	Oversight Measures	Impact upon Meeting Strategic Priorities and the required Sector Change
1.	Build upon the work undertaken by participation in the Supported Housing Oversight Pilot by continuing to resource a multi-disciplined, cross-departmental, team that is dedicated to overseeing and inspecting non-commissioned supported housing and continuing to support the Housing Benefit Review process. including assessing new providers and ongoing reviews regarding care support and supervision.	Some/Limited Unlikely to significantly reduce in size No dedicated funding for support. Individuals still incurring personal charge
2.	Formal communication with all Registered Providers of Social Housing in Birmingham, outlining the council's expectations and aligning housing providers to their strategic responsibilities.	Some/Limited Sign up remains voluntary. Effective only if providers agree to align No dedicated funding for support. Individuals still incurring personal charge
3.	Broaden the scope of the Quality Standard to include due diligence and organisational checks and balances. Quality standards will be aligned to other regulatory judgements.	Some/Limited Sign up remains voluntary. Effective only if providers agree to align No dedicated funding for support. Individuals still incurring personal charge
4.	Develop a council wide register of approved/best in class providers based upon due diligence testing and adherence to broader quality standards.	Some/Limited Providers free to source own referrals No dedicated funding for support. Individuals still incurring personal charge

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	Oversight Measures (continued)	Impact upon Meeting Strategic Priorities and the required Sector Change
5.	Adopt a council wide approach to referrals into non-commissioned provision.	Some/ Limited Providers free to source own referrals No dedicated funding for support. Individuals still incurring personal charge
6.	Encourage all statutory and regional partners to adopt the same.	Some/Limited Providers free to source own referrals. No dedicated funding for support. Individuals still incurring personal charge.
7.	Work with the RSH and other local authorities to reduce “lifting and shifting” of vulnerable people from elsewhere in the country.	Some/ Limited Providers free to source own referrals No dedicated funding for support. Individuals still incurring personal charge
8.	Adopt a Council wide approach to commissioning of supported housing placing conditions on use and rebalancing the emphasis so that both the support and the housing offer are equally considered. This will include due diligence testing on accommodation providers, managing agents and owners, regulatory compliance, rent levels maintained at Formulae/LHA rates and the adoption of Birmingham’s Quality Standards and Charter of Rights.	Some/Limited Comparatively small numbers of commissioned provision
9.	Seek alignment to the same commissioning standards from all other statutory and regional agencies who may also commission within the local authority area.	Some/ Limited Comparatively small numbers of commissioned provision
10.	Improve collaboration between statutory and regional commissioners through the development of commissioning board.	Some/ Limited Comparatively small numbers of commissioned provision
11.	Develop a single, clear route for citizens to access information about supported exempt accommodation, to get involved and to raise concerns and complaints.	Some/ Limited Reactionary management No dedicated funding for support. Individuals still incurring personal charge

### Delivery Plan - Next Steps

In order to progress the strategic priorities, set out in the Strategy a comprehensive delivery plan will frame delivery. The delivery plan will detail the specific actions required to further the embedding of the strategic aims and priorities into mainstream delivery including the details of reducing and repurposing existing provision, cementing and furthering the lobbying agenda and mainstreaming the learning from the pilots including an assessment of resource capacity.

**Appendix 1:** Dominant Operating Model (see appendix 1 for larger print version), Figure 8