Supported Housing

Guidance for local authorities in England

Contents

Glossary of terms

Term	Definition
Actors	Organisations, bodies, or individuals with a role in delivering, commissioning, regulating, or influencing supported housing services.
Care Quality Commission (CQC)	The independent regulator of health and social care services in England. The CQC monitors, inspects, and rates services to ensure they meet quality and safety standards.
Collaborative Move-On Pathway (C-MOP)	A coordinated approach that supports individuals in transitioning from supported or temporary accommodation into more independent housing, involving partnership working between housing providers, support services, and local authorities.
Commissioned providers	Providers contracted by local authorities to deliver supported housing services, adhering to standards and regulations and subject to regular oversight of contract delivery.
Department for Work and Pensions (DWP)	The UK government department responsible for welfare, pensions, and child maintenance policy, including administration of benefits such as Universal Credit and Housing Benefit.
Exempt accommodation	Supported housing which is exempt from certain Housing Benefit provisions. It is defined as: a resettlement place; or accommodation provided by a non-metropolitan county council in England, housing association, registered charity or voluntary organisation where that body or person acting on their behalf provides the claimant with care, support or supervision.
Extra care housing	Supported housing designed primarily for older adults with varying levels of support and care needs, offering both accommodation and access to social care and other services to support independence.

Term	Definition
Housing Benefit (HB)	Financial support for housing costs provided by the government to eligible individuals who are unemployed, on a low income or claiming benefits. New claims for housing benefit can only be accepted from people over state pension age or living in specified or temporary accommodation.
Housing Health and Safety Rating System (HHSRS)	A risk-based assessment tool used by local authorities to identify and address hazards in residential properties, ensuring that housing conditions do not pose a risk to occupants' health or safety.
Housing Solutions Service (HSS)	A local authority service that provides advice, support, and practical assistance to prevent homelessness, secure suitable accommodation, and help residents access housing options that meet their needs.
House in Multiple Occupation (HMO)	A property occupied by three or more people who form two or more separate households and share basic amenities such as a kitchen or bathroom. HMOs are subject to specific management and licensing regulations.
Individual Needs Assessment	An assessment carried out to understand a person's specific support requirements when entering supported housing. It considers factors such as health, care needs, risks, and independence goals, and helps ensure that the support provided is appropriate, proportionate, and tailored to the individual.
Joint Strategic Needs Assessment (JSNA)	A process carried out by local authorities and health partners to assess the current and future health, care, and wellbeing needs of the local population, informing strategic planning and commissioning decisions.
Key Performance Indicator (KPI)	A measurable value that indicates how effectively an organisation, service, or project is achieving specific objectives. KPIs are used to monitor performance over time.

Term	Definition
Licensing regime	Part of the regulatory framework under the Supported Housing (Regulatory Oversight) Act 2023, giving local housing authorities the power to require providers to obtain a licence to operate supported housing, based on compliance with quality and safety standards. The Act has undergone consultation during the development of this guidance and the requirements are yet to be enabled by the Secretary of State.
Local authority (LA)	A local government body responsible for delivering public services, including housing, social care, planning, and environmental health, within a defined geographical area.
Local Government Association (LGA)	The national membership body for local authorities in England and Wales, representing their interests and providing policy support, advice, and best practice resources.
Local Housing Allowance (LHA)	A housing benefit calculation method used for tenants renting in the private sector, determining the maximum rent that can be claimed based on location and the tenant's circumstances.
Local Needs Assessment	A systematic evaluation of local demand and housing needs, used by councils to inform supported housing strategies, plan for supporting housing to meet need and allocate resources effectively.
Ministry of Housing, Communities and Local Government (MHCLG)	The UK government department responsible for housing, communities, and local government policy in England.
Move-On Pathway	A structured process to help residents transition from supported housing to more independent living arrangements, often supported by council partnerships with private landlords and social landlords.
Multi-Disciplinary Team (MDT)	A collaborative team approach involving representatives from housing, social care, health services, and other relevant departments, used to improve strategic planning for

Term	Definition
	supported housing oversight and understanding of local support needs.
Non-commissioned providers	Supported housing providers that are not financially commissioned by councils, sometimes with variable levels of oversight and regulation.
Quality Standards Charter	A local framework established by councils to define minimum quality expectations for all supported housing providers, enhancing understanding and accountability across the sector.
Registered Provider (RP)	Private Registered Provider of social housing regulated by the Regulator of Social Housing, the great majority of which are not-for-profit housing associations. Housing associations are Private Registered Providers (PRPs), but are often referred to as RPs.
Registered Social Landlord (RSL)	A housing provider registered with the relevant regulatory body (in England, this is typically the Regulator of Social Housing) that offers affordable accommodation and operates on a not-for-profit basis.
Social housing	Housing provided by local authorities or private registered providers of social housing at below-market cost under two categories: 1. Low-cost rental accommodation – rented homes available at rents lower than market rates to those whose needs are not met by the commercial housing sector. 2. Low-cost home ownership (LCHO) – housing options such as shared ownership or equity-share schemes, making home ownership more accessible for those unable to afford full market prices.
Specified accommodation	Specified accommodation is a term used to describe supported housing where help with housing costs is provided through HB. With the exception of the refuge category, the

Term	Definition
	resident must have a need for and be provided with care, support or supervision. Specified accommodation is made up of four categories: • Exempt accommodation • Managed properties • Refuges • LA hostels
Supported housing	Accommodation where residents require and are provided with care, support and/or supervision to help them live as independently as possible within the community.
Supported Housing Improvement Programme (SHIP)	A government funded initiative that provides resources to local authorities to enhance the oversight of supported housing services.
Supported Housing (Regulatory Oversight) Act 2023	Legislation introduced to establish consistent standards and oversight across supported housing providers, with a focus on quality, safety, resident welfare and supported housing strategies. This will be referred to as 'SHROA' throughout this document.

Executive summary

This guidance aims to support councils to prepare effectively for the implementation of the Supported Housing (Regulatory Oversight) Act (SHROA) by improving oversight, strengthening provider relationships, and ultimately ensuring better outcomes for residents. It has been developed to reflect the realities councils face in overseeing a complex and often fragmented supported housing market. The guidance draws on examples of existing good practice and sets out clear steps that councils can take immediately, as well as actions to consider in the short, medium and long term.

Supported housing provides a vital safety net for individuals with complex needs, including people experiencing or at risk of homelessness, care leavers, people with disabilities, and those with mental health or substance misuse needs. While many providers deliver high quality services that enable residents to live more independently and avoid crisis, some have been found to exploit regulatory gaps. The SHROA introduces new powers and responsibilities for local authorities (LAs), including a licensing regime that will bring greater clarity and consistency to standards across the sector.

The guidance is organised around five key themes: developing a strategy and needs assessment, optimising internal relationships, optimising external relationships, achieving a compliance and collaboration balance, and placing residents at the centre of supported housing. Each section contains practical recommendations, suggested tools and example checklists to support implementation. The aim is not to be prescriptive but to help councils identify which levers are available to them now, and which can be built over time, depending on local priorities and capacity.

Resources have been included in this guidance in the form of checklists, external links and appendices. This includes key tools such as an example Housing Benefit (HB) claims checklist, Specified Exempt Accommodation (SEA) support audit template and links to wider literature.

The guidance acknowledges the challenges some councils face in engaging non-commissioned providers, balancing quality assurance with legal constraints, and coordinating across departments. However, it also highlights how early and collaborative action can ensure quality, reduce costs to public services, and improve the consistency of local provision. Throughout, the focus remains on practical actions that can be taken without significant new funding, and on using existing resources and relationships more effectively.

Recent developments in the sector present an opportunity for councils to shape supported housing in their area in a way that reflects local values and needs, while ensuring that residents with complex needs receive the support they require in safe, high-quality accommodation.

Introduction

Public Sector Access (PSA) is a consultancy firm committed to initiatives that contribute to a safer, healthier, and more inclusive society. Working in partnership with the Local Government Association (LGA), PSA has undertaken projects focused on supporting individuals with some of the most complex support needs in society. The guidance equips councils with resources and best practice insights to help them ensure there is effective oversight of supported housing management and delivery pending the publication by national Government of new regulatory requirements and Government guidance as a result of the SHROA. Its primary goals are to share best practices, consolidate learning from the Supported Housing Improvement Programme (SHIP) pilot funding, establish pathways for robust and positive partnerships with both commissioned and non-commissioned providers, and ensure local need for supported housing is met.

It is important to acknowledge that there will be some variability amongst councils in the approach, due to some councils having been supported to develop practice within their regions through the SHIP pilots (including with funding). This guidance may be of particular use to councils outside of the SHIP programme as they prepare for the new requirements of the legislation.

As councils introduce more systematic approaches to supported housing oversight, this will likely include a greater focus on ensuring consistent quality, and it is important to ensure that current residents are not put at risk of homelessness. A further aim of the guidance is to share learning from the SHIP pilots on how councils can intervene effectively to prevent homelessness as a consequence of council intervention.

Background to the LGA

The LGA are a politically led, cross-party organisation that works on behalf of councils to ensure local government has a strong, credible voice with national government. The LGA aims to influence and set the political agenda on the issues that matter to councils so they are able to deliver local solutions to national problems.

LGA membership reflects councils of all sizes and political affiliations in order to enable effective advocacy for the sector. This involves guiding councils by sharing best practice and challenging government policy where necessary to protect local priorities.

The LGA also help councils to innovate and improve, ensuring they have the tools and resources they need to deliver essential services for their communities. The LGA aims to strengthen local democracy and improve lives across England and Wales.

Guidance structure and how to use it

This guidance has been structured around five key sections, with each addressing an important component of delivering high quality supported housing schemes. These sections were developed through engagement with councils involved in the SHIP pilot schemes as well as providers, professional bodies and voluntary sector organisations within the sector. Supported housing is a complex sector due to the diversity of providers, services and residents' needs, so this structured approach allows councils to interact with the guidance in a way that suits their specific challenges and priorities.

Each section can be explored independently, depending on the aspect that councils wish to focus on.

Guidance key sections

Section	Purpose	Page number
Strategy and needs assessment	Supports councils in understanding local demand, shaping the market and planning the provision of services.	14
Optimising internal relationships	Focusses on collaboration between council departments, encouraging cohesion between HB, social care, commissioning and compliance teams.	28
Optimising external relationships	Focusses on strengthening partnerships with providers, care and support services and the voluntary sector to ensure a joined-up approach to supported housing schemes.	36
Compliance and collaboration balance	Provides guidance on how councils can maintain effective oversight whilst building positive relationships with providers and	47

Section	Purpose	Page number
	championing the provision of supported housing.	
Putting residents at the centre of supported housing	Guides councils on delivering schemes which focus on residents, preventing homelessness, promoting independence and ensuring safety.	66

Figure 1. Guidance key components
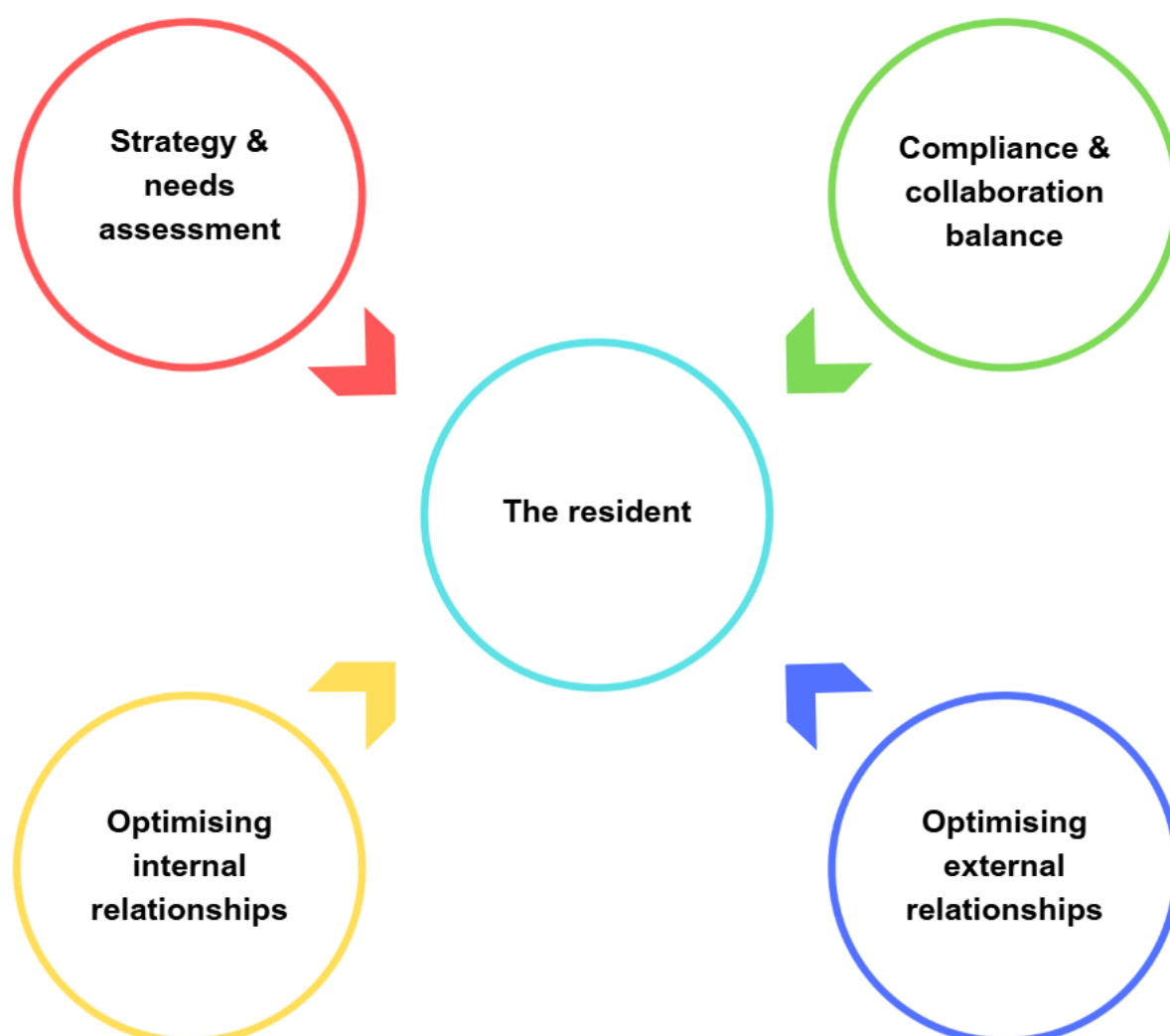
Overview of the key areas of need

Supported housing provides an essential service to diverse groups of individuals with support needs, each with unique challenges. This sector plays a pivotal role in improving their quality of life, building independence, and offering safety and stability in a secure home environment. The following section introduces the primary groups of people served by supported housing schemes, highlighting their specific needs and the crucial support offered to improve their wellbeing and self-sufficiency.

Older adults

As the population ages, older adults increasingly seek supportive housing environments that offer both independence and access to necessary support. Many older individuals face mobility challenges, chronic health conditions, or social isolation, which make it difficult to live alone in traditional housing. Supported housing for older adults provides these individuals with access to community health and social care services, tailored facilities, and activities that promote physical health and social engagement. Supported housing ensures that these needs are met, allowing older adults to maintain autonomy in a safe environment.

People with physical and learning disabilities

Individuals with physical and learning disabilities may encounter significant obstacles to independent living, including limited access to accessible housing and specialised care. Supported housing offers accessible, adapted living environments with care tailored to individual needs, helping residents manage daily tasks and navigate personal challenges. For those with learning disabilities, supported housing also provides structured support and life skills training to foster autonomy and enable meaningful community engagement. This bridges the gap between care and independence, empowers people with disabilities to lead fulfilling lives in an environment designed to meet their specific needs, and avoid inappropriate stays in institutions such as hospitals.

People with mental health conditions

Mental health conditions can severely impact an individual's ability to maintain a stable home, affecting daily routines, employment, and social relationships. Supported housing for people with mental health conditions provides safe, stable environments with access to mental health support and therapeutic services. This support helps residents manage symptoms, develop coping strategies, and ultimately achieve greater stability in their lives. For individuals transitioning from mental health facilities or in recovery from mental health crises, supported housing offers a pathway to reintegration, providing the structured support necessary for sustained mental wellness and preventing readmission to institutions.

People fleeing domestic abuse

People fleeing domestic abuse often face complex and immediate housing needs, requiring safe and confidential accommodation where they can begin to rebuild their lives. Supported housing, including refuges and domestic abuse specific accommodation, offers a secure, supportive environment for survivors and their children. These schemes typically include trauma-informed services, legal and

financial guidance, and access to counselling. Supported housing helps survivors of abuse transition to safer living situations, empowering them to regain independence and offering critical support to break the cycle of abuse.

People experiencing or at risk of homelessness

People who experience homelessness often face overlapping challenges such as substance dependence, mental health conditions, or histories of trauma. Supported housing can provide stability while addressing these needs, helping individuals to access and sustain a tenancy, rebuild family relationships, and engage in work or training opportunities. It can also offer a pathway into longer-term accommodation where appropriate.

People recovering from substance misuse

Individuals in recovery from substance misuse face unique challenges, including managing their recovery and avoiding environments that may trigger relapse. Supported housing for this group provides structured environments with access to addiction counselling, peer support groups, and relapse prevention programs. Offering stable substance-free environments with access to key support services empowers individuals to make positive life changes, supporting long-term recovery.

Individuals transitioning from the justice system

People leaving prison often face social stigma, limited housing options, and significant barriers to employment, which can heighten the risk of reoffending. Supported housing schemes tailored for individuals transitioning from the justice system provide a safe, structured environment with access to vocational training, counselling, and assistance in finding long-term housing and employment. This support enables individuals to reintegrate into society successfully, reducing the likelihood of reoffending and helping them establish stable, independent lives.

Young people leaving care

Young people leaving care or at risk of homelessness require specialist supported housing that is distinct from general homelessness services. This group often faces family breakdown, unstable living situations, and a lack of support networks, making tailored provision essential. Supported housing for young people which typically caters to those aged 16 to 21 or 18 to 25, offers a stable environment with access to life skills development, education, employment support, and emotional wellbeing services. Integration with children's commissioning is crucial to ensure that young people receive appropriate support, particularly for those aged 16 or 17, where children's residential care may not always be the best option. Additionally, Ofsted now needs to regulate supported housing for care leavers ages 16 and 17. It's been suggested in the recent consultation that these providers may be exempt from local licensing. This type of housing helps prevent young people from experiencing the 'cliff edge' of losing support at 18, improving long-term stability and life outcomes.

The role of supported housing in empowering individuals with support needs

Each of these groups benefits from the stability, support, and specialised services that supported housing provides. The sector plays a critical role not only in meeting

immediate housing needs but also in promoting independence, dignity, and social integration.

Supported housing is uniquely positioned to bridge the gap between healthcare, social services, and affordable housing, delivering environments where individuals can achieve stability and thrive. Placing individuals at the heart of supported housing strategies, enables providers to create person-centred solutions that genuinely improve the quality of life for individuals with the most complex support needs in society.

The Supported Housing (Regulatory Oversight) Act 2023

The SHROA marks a pivotal step in the UK's supported housing landscape, driven by a need for enhanced accountability, quality, and value in a sector that has faced challenges in ensuring uniform standards. This legislation, introduced in response to mounting concerns around the quality and oversight of some providers, predominantly in transitional supported accommodation, aims to address these disparities by setting minimum standards across the sector and requiring LA-led licensing. It must be acknowledged that at the time of publication, new Government set standards and licencing requirements have not been finalised and so are not in force yet. This section outlines the SHROA's key aspects and provides an overview of considerations for councils.

Purpose and motivation for the SHROA

The SHROA was primarily motivated by gaps in regulation, which led to some inconsistencies in standards amongst providers. The SHROA's objective is to establish a regulatory baseline to prevent exploitation in the sector, ensuring that all providers deliver safe, adequate housing and necessary support services.

Additionally, the rapid growth of exempt accommodation – where rent levels are not subject to standard LA restrictions – has raised concerns in some areas about high rental charges and limited support provision. The SHROA seeks to improve oversight by enabling councils to identify and respond to providers who do not meet expected standards.

Requirements and responsibilities for LA

The SHROA mandates several responsibilities for LA, designed to improve the oversight and administration of supported housing. Key requirements include:

- Supported housing needs assessment: Local councils are required to conduct comprehensive needs assessments to understand local demand and plan service provision accordingly. It is anticipated that Government will publish guidance on the way these should be carried out. This should allow councils to allocate resources effectively, ensuring that populations with the full range of support needs from low to complex have access to quality housing support, and that this will be delivered through supported housing or general needs settings.

- Supported housing strategy: The SHROA requires each council to develop a supported housing strategy. This strategy should outline how the council plans to meet the assessed needs and include frameworks for monitoring, evaluation, and enforcement. This mandate is designed to promote a proactive approach, allowing councils to implement structured and sustainable supported housing plans.

- Licensing regime: one of the most significant provisions of the SHROA is the introduction of a licensing system for supported housing providers. Councils will be responsible for issuing licences based on a provider's ability to meet new National Supported Housing Standards. This requirement introduces

both the mechanisms and relevant powers for LAs to regulate both commissioned and non-commissioned providers, ensuring that all housing meets consistent standards.

Supported housing standards

The SHROA will establish minimum standards that all supported housing providers must adhere to, focusing on accommodation quality, support provision, and resident safety. These standards aim to improve the standards of supported housing schemes. Whilst these standards have not been confirmed yet, we know that they will be based on the following principles:

Person-centred

Residents can influence the support they receive, and their voices are respected and heard.

Respectful

Residents are treated fairly and with dignity and respect, without discrimination.

Safe and responsive

The accommodation provides a safe environment with responsive, supportive staff.

Effective

The supported housing provider takes a tailored approach to residents' support needs and can demonstrate that the service delivers positive resident outcomes.

Well led

Appropriate governance structures and organisational procedures are in place to enable the delivery of good quality supported housing and there is a designated responsible person.

The government's intention is that complying with accommodation quality standards will be a condition of getting a supported housing licence.

Anticipated challenges and strategic considerations for councils

Implementing the SHROA may present several challenges for LAs, particularly around funding, capacity, and engagement with existing providers. Strategic considerations include:

- Funding and resources: While new burdens funding is anticipated to support the administration of licensing and inspections, the actual costs of ensuring compliance may be a strain on councils' resources. Councils will need to balance compliance with supportive measures, especially for smaller providers that may struggle to meet licensing requirements without assistance or additional funding.

- Partnerships with providers: The SHROA emphasises a collaborative approach, encouraging councils to work closely with providers to facilitate compliance. Best practices suggest establishing regular communication channels, such as advisory panels or provider forums, to work with providers

on developing supported housing pathways and new provision, and support them through the transition to new standards and gather feedback. This will be particularly important in communicating how the supported housing strategies and licencing regime will work. When the SHROA was being debated in Parliament, Ministers and other politicians made it clear that they favoured councils adopting a risk-based approach to prioritising intervention and licensing (i.e. addressing concerns related to the most high risk providers first).

- Cross-departmental coordination: Successful implementation of requirements will necessitate close coordination between housing, social services, benefits administration departments and homelessness support services, including commissioning, planning and procurement. MDTs, as demonstrated in SHIP pilot areas, have shown effectiveness in handling complex housing cases through collaborative oversight, allowing councils to address a range of resident needs comprehensively.

- Sustaining supply of suitable supported housing: This is key to ensuring that additional compliance considerations from the SHROA do not negatively impact upon residents.

The Supported Housing (Regulatory Oversight) Act 2023 is a critical framework for councils to improve supported housing quality, ensuring consistency across providers and safeguarding resident welfare. Councils will be able to address longstanding issues in the sector, from quality disparities to exploitative practices through the SHROA's licensing and standards regime. However, as councils prepare to implement the SHROA, strategic planning and cross-departmental coordination will be essential to navigate potential resource constraints, maintain positive relationships with providers and prevent homelessness. It is important to note that the powers under the SHROA are with the ministry of housing, communities and local government (MHCLG) Secretary of State, and still subject to the ongoing consultation, and the implementation will follow decisions from central government.

Section 1: Developing a strategy and needs assessment

Partnerships and demand forecasting

A key foundation of commissioning and regulating successful local supported housing services is to have a dedicated strategy for supported housing. It is important to recognise that government guidance is expected on the conduct of local needs assessments and supported housing strategies. Therefore, the present guidance should be viewed as interim, with a focus on supporting councils to commence preparatory work to conduct needs assessments once the new national guidance is published. Councils should not be writing strategies at this point, but can still gather information on local providers, provision and need.

It is key for councils to have a strong understanding of their area's local supported housing demand. The SHIP pilots identified the need for data driven planning, to identify the gaps in service provision and ensure that the appropriate referral pathways are set up and communicated amongst internal council teams and providers. In two tier areas local housing authorities will need to work with their county council as well as consider working with other districts to assess supported housing need. There may be value in conducting the needs assessment at city region or other sub-regional level to secure economies of scale and share expertise.

A key question that councils can ask is:

Do we have a detailed understanding and clear visibility of the number and type of supported housing units available within our region?

It is important for councils to conduct internal audits and establish data collection and monitoring processes to ensure that accurate data on supported housing schemes is maintained and available to inform decision making. It is important for this to be done in collaboration with providers, ensuring that requests for information remain reasonable and with fair timeframes for responses.

The second and equally important component of this strategy is a thorough needs assessment of the local population. Councils can ask:

Do we have a clear understanding of the needs of our local population and the factors driving this demand within our region?

Figure 2. Strategy key components
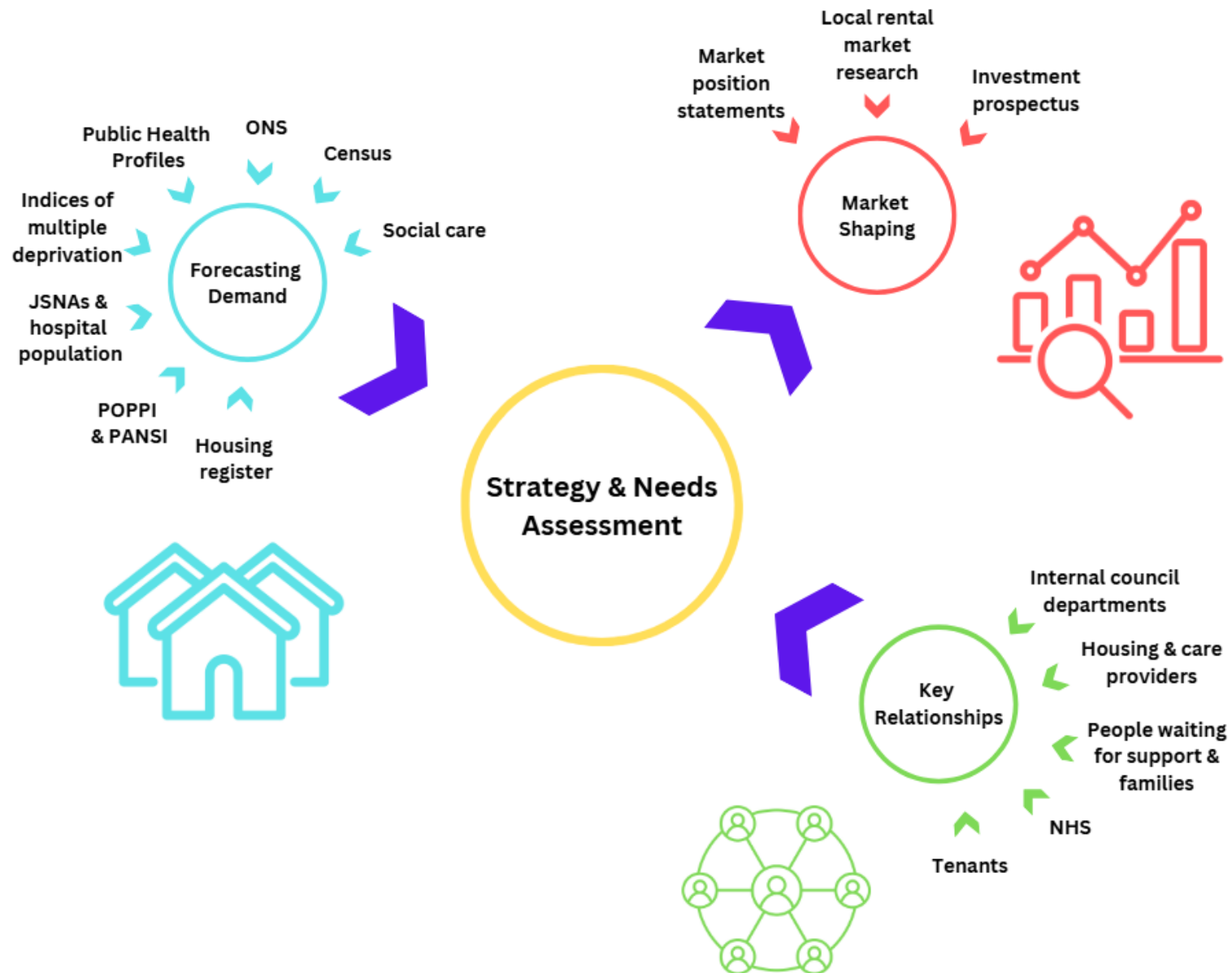
Data sources

It is critical for councils to fully understand the characteristics of the local population that requires supported housing. There are a number of ways that councils can achieve this. Councils can establish or strengthen relationships with key strategic partners in their region, including, mental health support services, social landlords, NHS Trusts, homelessness support organisations, domestic violence support services, and wider voluntary sector organisations. It is also important to consider data from service user organisations/voice and advocacy campaigners, prisons, social care departments (residential care/children's homes/data on people with a learning disability living with their family).

These relationships and clear communication will help to paint a clearer picture of where the key areas of demand exist and enable councils to plan appropriately. It also helps councils to track exactly where the most referrals are being made, so that care and support services can be planned appropriately. Councils can also align this approach with other local planning initiatives such as Joint Strategic Needs Assessments (JSNA), local housing needs assessments (for local plans) and wider housing and homelessness strategies.

In addition to this, councils can utilise a range of data sources and demographic tools to assess local demand and predict future needs in supported housing. The following data sources can offer baseline data:

- Census

- ONS population projections

- Public Health Profiles

- Indices of Multiple Deprivation

- Homelessness applications

- Social care data

- JNSAs

- Hospital population

- Housing register

- Existing supported housing population data.

For additional projections, councils can use tools such as the:

- [Projecting Older People Population Information (POPPI)](#)
- [Projecting Adult Needs and Service Information (PANSI)](#)

Best practice insight 1

Hull City Council have worked with Homeless Link to align accommodation availability with demographic trends and turnover rates. A targeted needs assessment in collaboration with a voluntary sector partner ensures that housing supply meets the current demand and that individuals with support needs are

adequately supported. It also increases the likelihood of residents being accommodated in the right setting the first time round, supporting improved outcomes.

This is a great example of a council working effectively at the intersection between data and partnerships to deliver coordinated services, and ensuring the most efficient use of limited supported housing stock.

Move on pathways and proactive market shaping

Partnerships are key not only for demand forecasting, but for the successful day to day delivery of services. Strong partnerships lead to residents being accommodated in the right setting, with the right support based on their specific needs. Having a robust strategy is also key for planning move on pathways. It is of the utmost importance for councils to have clear processes established for liaison with both internal council departments, housing providers and care and support organisations so that a coordinated effort is made to ensure people are supported to move on to independent living or longer-term placements appropriate to their needs. This means that supported housing placements can be needs driven and outcome focussed as opposed to councils being dictated solely by what is available within the market (market driven). At the same time, it is important to acknowledge that existing mechanisms can already be meeting local needs, and there is no need to overhaul or decommission where these existing structures work.

Kirklees council has a collaborative move-on pathway (C-MOP) where those in supported housing ready to move-on to the private rented sector can be referred into the housing solutions service (HSS) to help with finances to secure a property they have viewed. In exchange, HSS have first refusal on the void space in the supported housing scheme.

A 2024 [case study](#) from Metropolitan Thames Valley Housing (MTVH) highlights how the shortage of social housing is making it harder for people to move on from supported housing. Residents often end up in expensive and unstable private rentals, where they are more likely to lose tenancies without the support available in social housing. In response, MTVH worked with LAs to set clearer pathways into social housing for residents ready to move on, including securing quota agreements and advocating for tailored allocations through local housing registers.

Acknowledging the complexity of developing sustainable move on pathways, it is important to recognise that achieving this level of coordination requires navigating diverse organisational priorities, resource constraints, and the unpredictable nature of housing availability, which can make aligning placements with individual needs a particularly challenging task.

It's important to remain in control of these challenging landscapes, and not be controlled by the market dynamics. In order to achieve this, councils can work proactively to shape the market dynamics based on local needs. For example, Leicestershire County Council has adopted a market-shaping strategy through its [investment prospectus](#), outlining local housing needs to attract suitable providers to

the region. This strategic approach helps Leicestershire shape the local housing market, inviting providers aligned with council goals.

Some additional resources for councils include:

Surrey County Council Market position statement: Right homes, right support (March 2024)

This [strategy](#) outlines Surrey's ambition to deliver specialist housing, such as extra care and supported independent living, integrated with care and community services. It emphasises well placed, adaptable housing that fosters independence and reduces reliance on residential care by prioritising person-centred support, modern housing design, community integration, and assistive technology

Surrey County Council: A housing strategy for Surrey

This broader housing [strategy](#) builds on the above vision, setting out survey driven priorities to expand specialist accommodation across Surrey by 2030. It includes targets to deliver approximately 1,400 specialist units, covering extra care, supported independent living, and mental health provision, utilising council land and partnerships to meet both current and future housing with support needs.

Places for People: £23 million extra care development

In Guilford, Places for People and Surrey County Council have launched a £23 million [extracare housing scheme](#) designed for older residents requiring long-term care. The project combines purpose built, accessible homes with onsite support and community facilities, aiming to improve outcomes and reduce long-term reliance on institutional care

Hull City Council needs assessment

This [example](#) of Hull City Council's needs assessment, completed by Homeless Link, provides a thorough overview of the needs assessment methodology, combining quantitative data, stakeholder engagement, and resident insight to build a comprehensive picture of local supported housing demand. Councils may wish to draw on this approach when designing their own assessments, particularly in terms of integrating local data sets and identifying unmet need across different cohorts.

Best practice insight 2

Bristol City Council has developed an excellent approach to engaging with and regulating the private sector market (private registered providers of social housing (PRPs)/housing associations). In particular, Bristol has developed rigorous tender processes for providers, focussing on quality whilst achieving value for money. These quality focussed procurements ensure that individuals with support needs are living in safe, supportive environments delivered by trusted providers. This approach makes sure everyone (housing providers, commissioners, HB departments, social care) are round the table and in agreement from the very beginning.

Councils that proactively engage with private landlords and developers can gain valuable insights into their local housing economy, helping them to identify

opportunities for supported housing provision. Forums, surveys, and direct engagement can reveal trends in property availability and rental pressures, allowing councils to plan strategically for future need. The Oldland Common specialised supported housing Scheme in South Gloucestershire is one example of this approach in action. The scheme was developed on a privately owned site acquired at open market value, highlighting the importance of engaging with the private sector to secure suitable land. Led by Elim Housing Association, with joint commissioning from three LAs, the scheme provides bespoke homes for people with learning disabilities and autism, offering robust design, community integration, and 24/7 support. This collaboration was underpinned by a joint agreement on nominations and void costs, demonstrating how councils can shape and de-risk supported housing delivery through active market engagement and partnership.

Roles and responsibilities

Everyone has a responsibility for ensuring that the needs of individuals are met, but this needs to be broken down into tangible steps and clear roles and responsibilities amongst councils, providers, care and support organisations and wider system partners.

Examples of how these roles and responsibilities can be assigned are set out in the tables on the following pages.

Stakeholder	Roles and responsibilities
Local authorities (LAs)	- Secure funding for commissioning services. - Quality assure services within the region (contract monitoring). - Assess the admissibility of HB claims against Department for Work and Pensions (DWP) regulations. - Understand the legitimate costs of delivering supported housing - Coordinate strategic relationships with stakeholders, including the NHS, social landlords, care and support providers, and the voluntary sector. - Undertake thorough needs assessments of the local population. - Establish and maintain accurate records of local supported housing provision. - Plan for meeting supported housing need. - Ensure optimal care and support services are commissioned based on community needs. - Lead market-shaping efforts to attract and support appropriate providers. - Implement safeguarding protocols to protect individuals with support needs. - Foster Resident voice mechanisms, ensuring feedback informs policy and service design.

Stakeholder	Roles and responsibilities
	- Ensure the timely processing and payment of HB claims. - Collaboration activities such as providing training and advice to supported housing providers. - Ensuring effective communication between upper and lower LA tiers. This ensures that the upper tier tenders opportunities that align with the needs of the lower tier and ensures that risk is managed appropriately between the authority and providers. - Collaborate with support providers and landlords to create seamless referral and support pathways.
Housing providers	- Collaborate with councils on developing supported housing strategies. - Provide safe, high-quality accommodation. - Maintain transparency to ensure supported housing aligns with its intended purpose. - Provide appropriate information to verify claims for HB from residents. - Ensure properties are well-maintained, safe, and conducive to resident wellbeing. - Comply with contractual & forthcoming national quality standards, and meet RSH standards where relevant. - Collaborate with councils and care and support providers to create seamless referral and support pathways.
Care and support services	- Deliver high-quality care and support services tailored to resident needs, in collaboration with residents. - Ensuring co-production of services with residents. - Ensure services align with regional and national standards, such as Care Quality Commission (CQC) regulations for personal care and contract key performance indicators (KPI's). - Alignment with Ofsted standards for 16 plus services where applicable. - Support residents with their needs or to achieve independence where possible, through life skills training, education, or employment support. - Participate in multi-disciplinary teams (MDTs) to ensure integrated support for residents. - Monitor and report on resident wellbeing, identifying safeguarding risks where necessary.
NHS	Provide healthcare services integrated with supported housing, such as mental health support, substance misuse programmes, and hospital discharge pathways.

Stakeholder	Roles and responsibilities
	• Collaborate with councils to align housing with health priorities under Integrated Care Systems (ICSs). • Share data with councils to support needs assessments and strategic planning. • Contribute to funding and delivery of specialised services in housing schemes, such as step-down care or on-site healthcare.

Strategy and needs assessment checklist

Immediate actions

Action	Notes	Complete?
Has a senior officer or strategy lead been appointed to oversee supported housing across the council?	- Assign responsibility to an appointed lead who has authority across housing, HB, and social care. - Form MDT working group to coordinate efforts.	☐
Develop governance structures	Establish a regular strategic forum with HB officers, commissioning teams, supported housing providers, social care, housing options, and safeguarding leads. Assign points of contact in each team to ensure smooth information flow.	☐
Conduct an internal audit of supported housing provision (commissioned, non-commissioned, RPs, and non-RPs)	- Use existing HB claims data and commissioning records to map current provision (quantifying number of units). - A provider survey can help to obtain more detail and fully quantify the scale of provision. - Cross check with housing needs assessments and social care caseloads to identify gaps.	☐

Action	Notes	Complete?
	• Engage floating support teams to understand trends in tenancy breakdown.	
Identify non-commissioned providers operating in the area and assess risks related to quality and HB scrutiny.	• Take a risk-based approach: Consider investigating providers with high void rates, poor resident feedback or schemes which are complex in nature. • Are processes in place to engage with providers before enforcement action is needed so that improvement plans can be offered first?	☐
Identify key data sources	Consider: • Census • ONS population projections • Public health profiles • Indices of multiple deprivation • Homelessness applications • Social care data • JNSAs • Hospital population Housing register • Existing supported housing population data	☐

Action	Notes	Complete?
Have both existing needs and provision gaps been mapped to identify where are there shortages or over supply?	• Use homelessness data, social care referrals, and NHS & voluntary sector data to identify high-demand areas. • Compare with provider capacity data and void rates to identify gaps. • Create a simple dashboard showing supply vs demand for each support need.	☐
Ensure processes are in place to work with existing providers to ensure the ongoing supply of housing.	• Is there a provider engagement plan? • Is there a current provider database? • Are provider risks being monitored? • Is future demand being forecasted? • The RSH.GOV Transparency Data may will help with mapping RP's. Councils can then assess if they are able to expand provision.	☐
Identify and map move-on pathways to prevent bottlenecks in supported housing placements.	• Councils can engage with all internal housing teams (council	

Action	Notes	Complete?
	housing) and other housing providers in the local areas and explore incentives/reciprocal relationships. • Consider auditing current move on pathways. • Are housing options teams and PRS landlords being engaged with to plan move on pathways? • Ensure floating support services are engaged with and aligned to move on pathways.	☐

Short term actions

Action	Notes	Complete?
Map out system partners within the local area.	• List local NHS Trusts, mental health services, substance misuse teams, social care teams, voluntary organisations, and providers that interact with supported housing. • Is there a contact list for each organisation?	☐
Consider sending out a local market position statement based on the outcomes of the immediate actions to	• Use data from your supply-and-demand audit to define needs.	☐

Action	Notes	Complete?
communicate supported housing needs to providers.	• Publish as a formal document and share it with local providers and prospective developers.	
Engage with floating support services to identify early intervention opportunities.	• Identify residents at risk by using complaints, housing options team and safeguarding data. • Where appropriate, scale up floating support teams that can provide light-touch support. This can be applied to residents who may be suitable for general needs settings with some floating support as well as intervening before more intensive supported housing is required. • Review referral pathways between housing officers, social care and wider system partners for floating support provision.	☐

Medium and long term actions

Action	Notes	Complete?
Are processes in place to assess the financial impact of the supported housing provision, including risks of HB subsidy loss?	- Consider developing processes between HB, housing quality officers and internal council finance teams to model different HB subsidy scenarios. - This should include positive financial impacts such as taking pressure off social care/temporary accommodation. - It is important to note that the subsidy loss issue does not result in rejecting nonregistered providers.	☐
Develop a contingency plan for providers at risk of closure or non-compliance	- In line with a risk-based approach, identify providers at highest risk of non-compliance or financial failure and develop early contingency plans to reduce the risk of homelessness. This helps to avoid situations that are both distressing to residents and costly to council, including supporting providers from both a financial and quality perspective. - Identify alternative trusted providers who can take over failing services when the need arises.	☐

Action	Notes	Complete?
Identify existing strategies and investment prospectus materials	Councils should await further guidance following the SHROA implementation regarding strategy development. However, collecting any existing resources may help to provide context and baselines to build upon.	☐

Section 2: Optimising internal relationships

Councils can improve the efficiency and effectiveness of their supported housing schemes by encouraging collaboration between internal LA teams and implementing a multidisciplinary team (MDT) approach. Co-ordinating the efforts of HB teams, compliance officers, commissioners, housing strategy teams, procurement officers and social care departments is essential to streamline processes, improve outcomes for individuals with support needs, continue to meet the need for supported housing, and ensure robust oversight of supported housing schemes and prevent homelessness.

Building internal bridges

Effective supported housing management in practice, follows on seamlessly from the development of the strategy and begins with strong internal collaboration. The complexity of supported housing requires a whole council approach where housing strategy teams, social care, compliance and HB teams, commissioners and procurement officers work together cohesively to oversee the continuing provision of high-quality services. At this stage, councils can establish regular joint meetings to share updates on issues and opportunities as they emerge, and then establish specific MDT's once the SHROA is implemented.

These developed governance structures are evident with in both Coventry and Hull councils who have co-ordinator roles which work across internal council departments. This has enabled these organisations to identify shared priorities between internal teams and develop co-ordinated solutions. Councils who have a strong interface between the commissioners of schemes, compliance teams working with commissioned housing providers, social care teams, and the teams processing claims are more likely to ensure accurate review of claims, as well as resolve disputes with providers in a more transparent and sustainable way, while also preventing homelessness. This also supports all groups to develop a full understanding of supported housing service requirements and costs. Strong internal relationships can have a positive effect on relationships with external bodies such as the housing providers, setting supported housing schemes up for success.

Strong internal relationships also allow teams to communicate their priorities and any conflicts. For example, benefits teams shouldn't make decisions without considering the knock on impact on homelessness teams.

A key question for councils to consider is:

Do we have mechanisms in place that facilitate effective communication, strong internal governance and collaborative working across departments?

Promoting collaboration and shared learning between council departments will help to break down silos and enable teams to address challenges collectively. This avoids duplication and solidifies a unified approach to supported housing. How can 'them and us' mentalities between councils and providers be transformed, if these cultures exist within the LA itself?

MDTs

MDTs bring professionals together across the various council departments that have been identified in the section above, to deliver integrated housing and support to residents. MDT working is also key to working in partnership with providers and care and support organisations within the voluntary sector. Providers will respond well to an organised and joined up council approach, particularly one that supports them to comply with the relevant quality standards.

Kirklees Council's MDT approach has streamlined the assessment of supported housing claims by integrating HB officers, SHIP contract & monitoring officers, and SHIP housing compliance/property standards officers. Regular collaboration through weekly MDT meetings ensures that claims are reviewed efficiently, with contract & monitoring officers assessing support provision and making recommendations for claim reviews. Where concerns arise, potential claim terminations are discussed collectively with senior officers from the housing solutions service and the provider. Councils looking to enhance their claims processing can replicate this model by establishing a dedicated quality team that works closely with providers and HB teams. (See best practice insight on page 23). The key principle is to ask:

Do we 'know' our local service provision and what they were commissioned for and how they are performing?

Councils can consider implementing regular 'touchpoints' to ensure that this question is being answered thoroughly and continuously.

Best practice insight 3

Coventry Council has nurtured strong internal relationships. They have a dedicated eviction prevention panel, delivered through an MDT approach with internal council teams. This group also works actively with providers to tackle issues early, reducing evictions and preventing homelessness. This is a strong example of having a robust understanding of individual resident circumstances in a high level of detail. This not only supports residents to maintain stable housing but also reduces the costs associated with emergency homelessness services and last minute interventions.

Figure 3. Optimising internal relationships

Shared Governance
& Data

Housing Benefit
Teams

Social Care
Departments

Optimised Internal Relationships
(Effective Supported Housing)

Joint Decision
Making

Commissioning

Compliance, Quality &
Training & Development teams
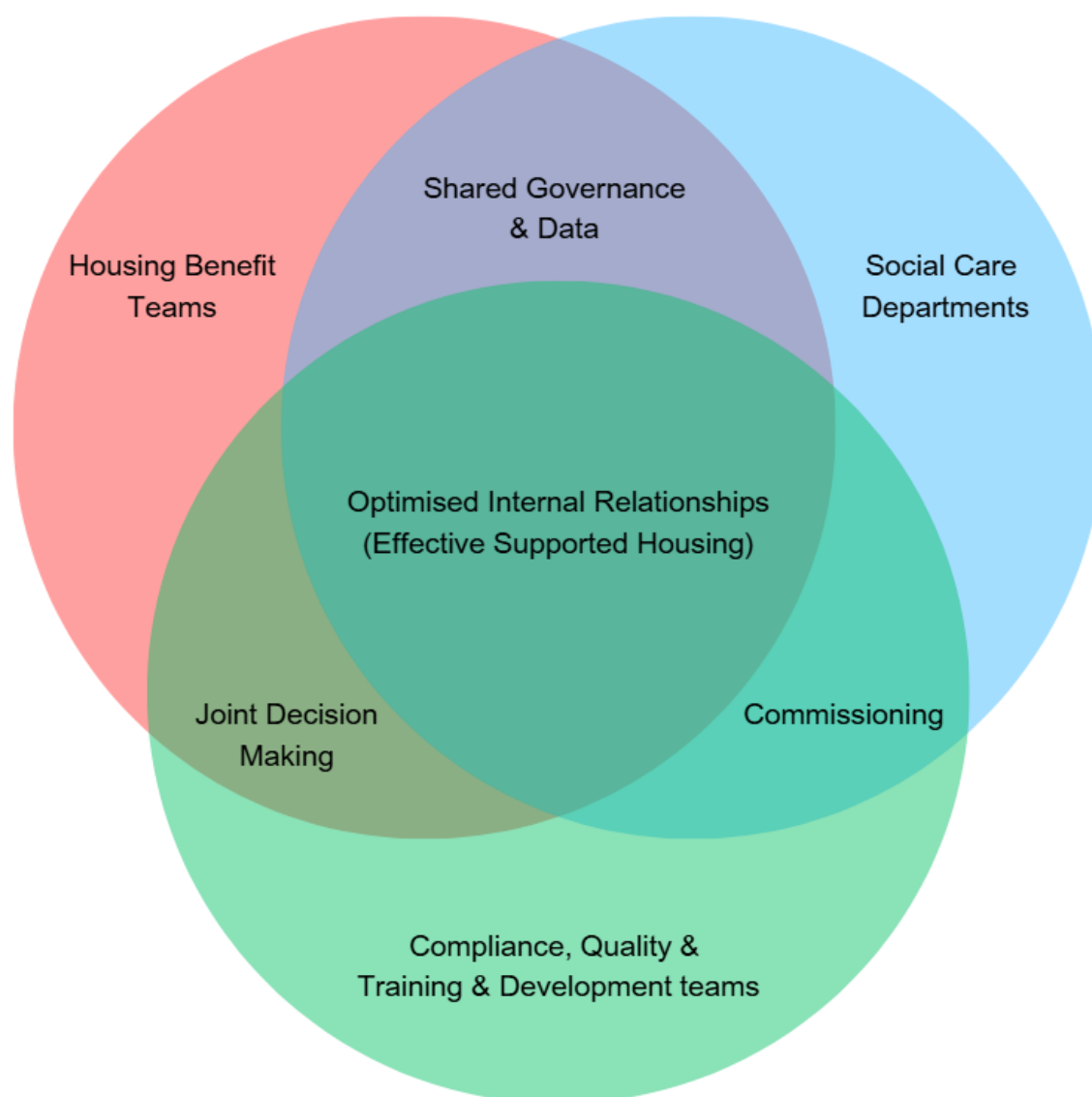
Leveraging data

Councils can harness data to align the internal processes and maintain oversight.
Internal dashboards that track the local supported housing landscape (following on
from the national data tools identified in the strategy section), can be utilised to track
referrals, occupancy rates and compliance inspection schedules. This can also
support the previously mentioned governance structures by providing a basis for
accurate reporting. Establishing and maintaining data and reporting processes can
help to identify spikes in complaints or issues related to a particular provider,
enabling compliance and HB teams to act quickly and identify solutions. Councils
can also make use of external data sources such as the Regulator of Social Housing
(RSH) and Care Quality Commission (CQC) to provide high level information on
providers.

Regularly reviewing the data available can also monitor changes in need for supported housing and enable council teams to identify systemic issues such as high areas of demand, capacity constraints and 'bottlenecks' in service provision. In addition to this, maintaining accurate datasets can support bids or business cases for regional or national funding initiatives, by being able to clearly demonstrate particular needs within a group and the demand and capacity implications. It is important for councils to share this data across its relevant departments and tiers. This also links into the principle of having sustainable funding strategies which will be explored in further detail later.

Best practice insight 4

Kirklees Council SHIP team is an example of data driven planning, utilising the Northgate and Business Objects systems for weekly reporting and have ingrained this into their management and governance processes. These dashboards track HB claims to help identify which providers are receiving HB payments and how many units are occupied. These robust management processes, when used in conjunction with population demographic data, enables them to monitor service quality, identify gaps in provision and optimise resource allocation. This leads to reduced delays in interventions and improved oversight of local supported housing schemes. If additional funding is secured, a further improvement will be to have a single system which captures all relevant supported housing data.

Training and development

Investing in ongoing training for council staff across various departments ensures that teams are prepared to work with supported housing schemes effectively. This also ensures that teams feel empowered and builds a sense of shared responsibility across the MDT to ensure the successful delivery of these schemes. The key topics for training could include latest legislative changes, safeguarding protocols, quality standards and raising awareness of key events within the sector. For example, webinars run by the National Housing Federation (NHF) can provide a great opportunity to keep abreast of key developments within the sector (Recordings are available). The Housing Community Summit is also a valuable forum.

The LGA hosts a Supported Housing Network which will become a support network for council officers once the SHROA is implemented.

LA staff can access free training from the National Homelessness Advice Service (NHAS) and should also take advantage of internal training opportunities, such as those provided by the Safeguarding Board, Domestic Abuse Risk Assessment and Management Meetings (DRAMM), Multi-Agency Risk Assessment Conferences (MARAC), and Safer Neighbourhoods, covering topics like modern slavery and cuckooing. It is advised for new burdens funding to include these activities within its scope.

Process breakdowns between LA tiers

In two-tier LAs, the division of responsibilities between county and district councils can create challenges in delivering effective supported housing. Historically, upper-tier authorities received the original Supporting People funding, though typically limited to their statutory responsibilities. Meanwhile, district councils hold the

statutory homelessness duties, meaning the split goes beyond HB administration and compliance oversight, as it also extends to unmet needs and resource limitations for addressing them. This fragmentation can lead to gaps in service provision, delays in identifying and responding to quality concerns, and difficulties in ensuring financial sustainability.

However, the introduction of the SHROA will provide housing authorities with the duty and accountability to assess local needs, develop strategic responses, and implement a licensing programme, intending to create a more coordinated and structured approach to supported housing oversight.

To overcome these challenges, councils can:

- Develop mechanisms for consistent and structured communication across tiers.

- Establish formal governance structures, such as joint taskforces or inter-tier working groups, ensuring that all relevant teams share information and align their approaches.

- Hold regular meetings with representatives from HB, compliance, and other relevant departments to help identify emerging issues and coordinate responses.

- Shared data platforms or dashboards that track provider compliance, HB claims, and use inspection outcomes to improve transparency and enable all teams to work from the same evidence base.

- Tenders issued by an upper-tier authority for accommodation-based care or support should be developed in collaboration with the lower-tier councils they partner with, ensuring there is a shared understanding of local needs. Currently, upper-tier authorities may procure both accommodation and care services without lower-tier councils being involved in the process, leaving district councils unaware until a HB claim is submitted. A more coordinated approach would ensure that procurement decisions align with local priorities and resource planning across both tiers.

Optimising internal relationships checklist

Immediate actions

Action	Notes	Complete?
Assign a single point of contact	- Establish a clear communication stream (e.g. a designated person, working group, or shared inbox) to ensure coordination between housing, social care, and HB teams. - Are departments aligned on the processes for provider engagement? - Are processes in place to facilitate case discussions to address complex claims?	☐
Develop processes for planned targeted joint property visits to ensure housing safety, assess support provision, and evaluate resident wellbeing, promoting both compliance with standards and the independence of residents	This should focus on: - Housing conditions in relation to safety and suitability. - Support provision to ensure that providers are delivering support. - Resident experience to ensure their wellbeing and promote independence where possible.	☐

Action	Notes	Complete?
Review processes for the escalation of urgent cases	Are processes in place to deal with the following situations to prevent homelessness: • providers at risk of closure. • HB claim suspensions (with the focus on early intervention before escalation to this stage). • residents at risk of eviction, with immediate housing options support.	☐

Short term actions

Action	Notes	Complete?
Consider the data sources and infrastructure available to share insights with key council teams	• Is supported housing capacity clear: available and occupied accommodation? • Is there an understanding of referral patterns to track who is entering and exiting supported housing? • Are tenancy sustainment rates being tracked to identify where placements are failing?	☐

Action	Notes	Complete?
	• Are provider compliance and financial risks being tracked to ensure early intervention and collaboration with providers?	
Develop regular governance structure for case reviews	Are housing, social care and HB teams meeting on a regular basis to: • Review cases where residents are at risk of eviction due to HB claim challenges. • Identify providers with persistent quality issues and agree on corrective actions. • Discuss emerging demand trends and service gaps.	☐
Deliver training workshops to align internal teams on supported housing processes	• Provide practical training on HB rules, referral pathways, roles, and escalation procedures. Build shared understanding across teams.	☐

Medium and long-term actions

Action	Notes	Complete?
Develop data sharing agreements between key council teams	Can the relevant council teams access compliance reports, social care assessments and provider performance and risk assessments where appropriate?	☐

Action	Notes	Complete?
Assess the current position for developing an MDT approach by mapping out internal skills and professionals available	Map out skills within the following teams: • HB • housing standards/strategy • commissioners • compliance • social care.	☐

Section 3: Optimising external relationships

Councils play a key role in shaping supported housing through the collaboration with external partners. This ranges from housing providers, local NHS Trusts, and care and support services to voluntary sector organisations. These relationships ensure that the local supported housing provision is meeting the interconnected needs of the local population. It is also important to maintain continuity with the overarching strategy discussed in section 1, so that supported housing initiatives do not exist in isolation, but rather, contribute to the wider population health goals and the avoidance of hospital admission which is a core strength of optimal supported housing. Equally, the local NHS Trusts should be open to engaging with councils on these strategies in line with the values of integrated care system working.

A key question for councils to consider is:

Are we proactively engaging with housing providers, NHS partners and care and support organisations to address health and housing inequalities through supported housing? Are we operating in isolation or as part of a wider, co-ordinated health and social care system?

Partnerships

A key part of achieving this is for council leads to identify and build relationships with key decision makers within the NHS, housing providers and local care and support organisations. System partnerships can have a hugely positive impact on the delivery of successful supported housing schemes. Furthermore, the key systems benefits identified above offer a great way to achieve the 'buy in' from key stakeholders. A strategy backed by both data and system backing makes for a strong case, and can even open the door to funding for housing related support and innovative models such as jointly commissioned services.

Best practice insight 5

Kirklees Council SHIP team is an example of data driven planning, utilising the Northgate and Business Objects systems for weekly reporting and have ingrained this into their management and governance processes. These dashboards track HB to help identify which providers are receiving HB payments and how many units are occupied. These robust management processes, when used in conjunction with population demographic data, enables them to monitor service quality, identify gaps in provision and optimise resource allocation. This led to reduced delays in interventions and improved oversight of local supported housing schemes. If additional funding is secured, a further improvement will be to have a single system which captures all relevant supported housing data.

A key benefit of strong external partnerships is the opportunity to co-design accommodation pathways and having a thorough understanding of all the referral routes which exist (as many of these partners will also be referrers) and this makes the overall approach to supported housing proactive rather than reactive. When collaborating with the NHS, this not only enables faster discharge and reduction in pressure on acute care services, but also increases the opportunity of getting things

right the first time around. For example, designing processes which do not clash across organisational boundaries, but instead align with the shared priorities of both organisations. This will help to ensure that people are being housed in appropriate accommodation based on their specific needs on the first attempt. Having timely support, curated through strong relationships with wider care and support organisations also reduces reactiveness, and increases the likelihood of successful move on pathways to independent living, or longer-term placements where required.

Organisations that councils could consider include:

- NHS Trusts

- Mental health services

- Substance misuse recovery programmes

- Domestic violence support

- Homelessness support services/charities

- Older peoples organisations and forums

Councils could consider mapping out all of these relationships to ensure no key stakeholders have been missed. A huge part of achieving successful strategic oversight of the provision of supported housing schemes is to do the basics right on a consistent basis, and it is important to not overlook a key partnership.

Cost savings and effective supported housing

Working effectively as a system can have a number of benefits at both individual council and system level when delivering effective supported housing schemes. Understanding the scale of the challenge is the first step towards making a compelling financial case for investment in supported housing. The National Housing Federation's Supported Housing to 2040 analysis projects that England will need 219,127 additional supported housing units by 2040, reflecting both hidden demand (51,798 units) and population-driven growth (167,329 units). This would take total supply from approximately 509,873 in 2023 to around 729,000 by 2040. Delivering those units carries an estimated development cost of £33.9 billion, with £10.5 billion per year forecast for rent, service charges and support, which includes £4.9 billion likely to be covered by HB or universal credit.

Complementary modelling in the NHF Costs and Benefits briefing identifies potential public sector savings of £6 billion per annum, with current provision estimated to already save £3.5 billion annually through reduced demands on crisis, homelessness, and care systems. These savings are largest for older people (circa £3.66 billion) and people with learning disabilities or autism (£1.27 billion).

Supportive housing also plays a vital role in reducing delays in hospital discharge. NHF's Reducing Delayed Discharge briefing reports that in 2023/24, 109,029 hospital bed days were lost due to waiting for supported housing, constituting about 19 percent of all delayed discharge days in mental health settings. The associated cost to the

NHS is estimated at £56 million, with safe discharge pathways offering potential savings in the range of £26 million to £50 million annually.

Councils can put this evidence into practice by:

- Using local planning and demographic data to model the likely number of supported housing units needed to both meet service demand and avoid public costs.

- Embedding supported housing targets into housing strategies to align commissioning with forecast need and to support grant or capital funding applications.

- Developing costed business cases that demonstrate downstream savings in health, homelessness, and care systems by preventing hospital delays or reducing reliance on institutional placements.

- Prioritising supported housing development for client groups with the largest demonstrated cost-benefit (such as older people and those with learning disabilities or autism).

- Embedding supported housing in integrated discharge pathways with Integrated Care Boards (ICBs) and homelessness services to reduce hospital length of stay and recoup NHS savings.

Examples of effective partnership working

Cornwall Council and Coastline Housing

Coastline Housing works closely with Cornwall Council's housing options and adult social care teams to support people experiencing street homelessness. They operate a purpose-built scheme called Chi Winder, where individuals receive personalised support packages and access to an on-site GP service. Partnerships include integrated referral, shared risk assessment, and collaborative tenancy sustainment planning. This model demonstrates how combined council and provider action can prevent homelessness and support successful move-on into permanent accommodation.

Partnership Models from LGA-Commissioned real world examples

The LGA case studies emphasise the value of council investment in supported housing to achieve savings across public services. In Bradford, supported housing schemes delivered estimated £47,000 per person in NHS savings, while in Medway, 151 people with complex needs accessed employment or training within nine months. These examples underline how strategic partnership between councils and providers can create value beyond housing alone.

Strategic commissioning for people with learning disabilities and autism

LGA guidance on developing specialist pipelines for people with learning disabilities and autism highlights the role of councils and NHS commissioners working together to co-produce supported housing supply. These partnerships structure risk-share

agreements, nominations protocols, and referral consistency, ensuring that housing aligns with individual support needs and clinical pathway objectives.

Improving hospital discharge pathways through supported housing partnerships

The NHF's finding a safe home after hospital report highlights how delays in hospital discharge, particularly from mental health settings, are increasingly caused by a lack of supported housing, with over 100,000 delayed bed days and £71 million in avoidable NHS costs in 2023/24 alone. Case studies from Bolton, Gloucestershire and East London show how partnerships between councils, ICBs and supported housing providers can ease these pressures by creating dedicated step-down accommodation, shared referral processes and integrated discharge pathways. Councils can replicate these models to improve outcomes and reduce public expenditure.

Best practice insight 6

Councils partnering with organisations like St Basil's in the West Midlands, demonstrate how collaboration with specialist providers can improve outcomes for young people with support needs. St Basil's delivers tailored supported housing for those aged 16 to 25, using a strengths-based approach focused on keeping young people in education, employment, and stable housing. Their expertise in creating psychologically informed environments enhances resident wellbeing and fosters independence, while their accredited programmes with the University of Birmingham provide councils with access to best practices and training. This partnership approach ensures holistic, high-quality support, addressing immediate housing needs while equipping young people with skills for a secure future, reducing the risk of long-term homelessness.

A key question that councils can ask is:

Are we resourceful in our approach to supported housing, maximising the opportunities that partner organisations can present?

In a similar way to the internal council MDTs, multi-agency system forums could be sought out or established if they do not exist. This is easier once key stakeholder 'buy-in' is achieved and can encourage collaboration between council housing teams, NHS Trusts, housing, care and support providers. There is a practical function to these mechanisms, as they provide opportunities for professionals to ensure that people with complex needs have some choice and control and are able to access an appropriate housing pathway.

Councils (unitary or upper tier) already have a responsibility for market management, engagement, and shaping within social care services, including supported living, under the Care Act 2014. This requires LAs to assess existing services, facilities, and community resources that could support people locally, identify individuals with unmet care and support needs, and ensure that carers also receive the necessary support. Embedding these considerations into supported housing strategies strengthens collaboration across housing, health, and social care, ensuring a more

integrated approach that meets the diverse needs of local communities.

Voluntary and community sector

The voluntary sector is a key partner in delivering person centered supported housing. These organisations often have deep rooted connections within the local community. A key part of this is delivering culturally sensitive support and targeted interventions. This links back to the earlier principle of having a strong understanding of the local population's needs and the demographics ('knowing' your local population). Councils can consider mapping out the key voluntary sector organisations and decision makers, including not for profit housing providers.

A practical example of this includes working with homelessness charities to provide wraparound support for residents transitioning from rough sleeping and working with the council to plan the individuals' journey to independent living. Similarly, partnerships with groups like local domestic abuse charities and local faith groups can enhance councils' ability to respond to specific needs such as those fleeing domestic abuse or experiencing social isolation. This aligns with the principle of having a resourceful approach to supported housing, mapping and utilising these groups as community assets, similar to the strengths-based approach of social care.

Best practice insight 7

Councils working with organisations like Crisis can enhance their approach to tackling homelessness and supporting individuals with support needs. Crisis provides services for people experiencing homelessness in nine areas across Great Britain and brings specialist expertise in housing-led models, including Housing First for people with high and complex support needs. Their approach focuses on moving individuals into permanent accommodation quickly and providing tailored support so people can sustain their independence, put down roots and, where appropriate, get back into work.

Councils can refine their supported housing strategies, enabling people to access settled housing more quickly and reducing reliance on transitional housing. Working with organisations like Crisis to provide tailored support can help councils deliver sustainable settled housing solutions, improving long-term outcomes for residents while addressing systemic barriers in the homelessness pathway.

Data sharing

Building upon the earlier points of establishing and maintaining strong data processes internally, councils can consider reviewing data sharing agreements with local system partners. A key question is:

Do the local data sharing processes support timely service delivery to a high standard, or do they inhibit this delivery?

Data sharing should always be managed in line with local and national standards to protect sensitive information, but councils can explore the ways in which data can be leveraged to support the specific goal of improving outcomes.

For example, the following could be considered:

- Are organisations able to access the information they require quickly to support pathways and deliver effective care and support?

- Have the system partners been informed of the key council contacts to formulate a co-ordinated solution?

- Are there shared data platforms being utilised within the system?

- Are the key data and insights closely guarded by stakeholders or are they being utilised to develop co-ordinated strategies, identifying trends amongst key referral groups, forecasting demand and allocating system resource effectively?

As a minimum, councils and their system partners should have an agreed upon set of processes for escalating concerns, safeguarding issues and protocol for acting decisively when a resident is at risk.

Councils that are able to successfully leverage system partnerships will most likely increase the resources available to them when delivering their supported housing schemes. Strengthening links with NHS Trusts, care and support organisations and the voluntary sector helps to build a strong network to support the diverse needs of residents. Furthermore, demonstrating the mutual benefits of this approach to partners will help to achieve their buy in and lays the foundation for innovative funding and delivery models. Most importantly, it builds a sense of shared ownership amongst partners and that everyone can benefit from optimal supported housing.

There are also a number of benefits that can be achieved through working with non-commissioned providers. These providers may have reach into communities that councils cannot access, along with a more grassroots/lived experience ethos which all contributes to a rich and balanced sector. Working with both commissioned and non-commissioned providers enables everyone to benefit from strong relationships.

Provider surveys: Practical tips for councils

Provider surveys offer councils a valuable opportunity to gather insights on service quality, operational challenges and market readiness, helping to shape more responsive strategies and target support where it is most needed.

Providers will find it helpful to know what the aim of the surveys is and to be given adequate time to fill them in, as staff time will be needed to complete the surveys. In particular, small providers may find that their staff are taken away from client-facing duties by filling in surveys. There should not be any restrictive conditions attached to filling in the survey, as this will create an adversarial relationship. It would help to try to speak to providers directly as well as sending surveys, to establish a positive partnership.

Component	Tips
Capacity and type of provision	- Ask providers to outline the type of support they offer (e.g. mental health, substance use, learning disability). - Include questions on the number of units, levels of support, and any eligibility criteria for residents.
Referral and move-on arrangements	- Include questions on referral routes: are they accepting referrals from statutory services? - Explore how move-on is supported and whether there are established pathways to social or private rented housing.
Safeguarding and staff training	- Ask whether safeguarding policies are in place and whether staff receive regular training. - Include questions on how safeguarding concerns are escalated and addressed.
Governance and risk management	- Include questions on whether the organisation has internal governance mechanisms, such as board oversight or quality assurance processes. - Consider asking about how risk is monitored and mitigated.
Engagement with the LA	- Check whether providers attend or are willing to attend local forums or partnership meetings. - Understand what support or engagement they would find valuable from the council.
Experience with HB	- Explore how confident providers are with HB processes. - Ask about any barriers they experience when working with HB teams or submitting claims.
Feedback and continuous improvement	Ask if and how providers collect resident feedback.

Component	Tips
	• Include a question on how they use this feedback to improve services.
Challenges and support needs	• Provide open-text boxes for providers to highlight what challenges they currently face. • Offer the opportunity for providers to identify where they would welcome support.
Regulatory status and accreditation	• Include a tick-box or drop-down option asking if they are a registered provider, a registered charity, registered with CQC, or member of any accreditation scheme.
Digital readiness and data collection	• Gauge how well providers collect and share data, including outcomes, safeguarding incidents and resident demographics. • Ask about their use of digital systems to support service delivery and reporting.

Optimising external relationships checklist

Immediate actions

Action	Notes	Complete?
Set up initial engagement forums for providers.	• Use these forums to share updates on regulatory changes, gather insight, and begin to build trust.	☐
Circulate safeguarding processes to all providers.	• Ensure all providers, registered and unregistered, understand local safeguarding protocols and escalation routes.	☐
Deliver support workshops for small and voluntary sector providers.	• Focus workshops on practical topics such as HB claims, safeguarding, service standards and referral processes. • These sessions can help smaller providers meet expectations without excessive administrative burden and can create space for collaborative problem solving.	☐

Short term actions

Action	Notes	Complete?
Establish system governance structures where key developments can be communicated and data insights can be shared.	• Are there forums for system partners to communicate and share developments, insights and changes within the sector?	☐
Engage with private landlords to identify properties suitable for supported housing.	• Use landlord forums or targeted outreach to surface sites for future	☐

	development or improved management.	

Medium and long-term actions

Action	Notes	Complete?
Establish local referral criteria for non-commissioned schemes.	• Work with housing options and homelessness teams to define when and how placements into non-commissioned services occur.	☐
Formalise partnership arrangements with high-performing non-commissioned providers.	• Consider framework-style arrangements or pathways agreements to integrate them more formally.	☐
Feed insight from provider engagement into market shaping and strategic commissioning.	• Use what's learned from forums and provider data to influence future supported housing strategy.	☐

Section 4: Compliance and collaboration balance

Councils face the double-edged challenge of maintaining oversight of supported housing schemes while fostering productive and supportive relationships with providers. Achieving the optimal balance between compliance and collaboration is key to ensuring high quality schemes, supporting well intentioned providers and addressing rogue practices within the sector. There are a number of strategies that councils can adopt to achieve this balance, with considerations for both commissioned and non-commissioned providers. The approaches set out in this Section assume councils will adopt a risk-based approach to introducing more proactive oversight of supported housing providers and benefit claims, with schemes presenting the highest safeguarding risks prioritised. In all cases, Councils are encouraged to adopt a proportionate approach that does not duplicate existing regulations or checks.

Striking this balance is particularly challenging, as it requires councils to uphold rigorous oversight and quality assurance while maintaining trust and positive working relationships with providers, all within the constraints of limited resources and competing priorities.

Clear expectations and standards

Councils can establish clear, transparent expectations from the outset to support providers in understanding their roles and responsibilities. Councils can create local quality charters that outline the minimum service requirements. There are some 'fixed pillars' that apply to both commissioned and non-commissioned providers, and awareness of the forthcoming national guidance and standards is one of them. Local systems will also need to align with forthcoming national guidance.

The supported housing principles can serve as a basis for this:

Person-centred
Residents can influence the support they receive, and their voices are respected and heard.

Respectful
Residents are treated fairly and with dignity and respect, without discrimination.

Safe and responsive
The accommodation provides a safe environment with responsive, supportive staff.

Effective
The supported housing provider takes a tailored approach to residents' support needs and can demonstrate that the service delivers positive resident outcomes.

Well led
Appropriate governance structures and organisational procedures are in place to enable the delivery of good quality supported housing and there is a designated responsible person.

Best practice example 8

Hull City Council is a stand out example of its work during the SHIP pilot, effectively communicating the standards and ensuring the appropriate resources are available for providers to align with these standards. Hull puts a strong emphasis on its [standards charter](#), supporting providers who are willing to improve to meet the standards.

A key question for councils to consider is:

Do our quality standards clearly articulate expectations for both commissioned and non-commissioned providers?

The way in which these standards may be measured is the key differentiating factor between commissioned and non-commissioned providers. Below are some examples of how councils may decide to measure this (some assumptions are made, in advance of the SHROA being implemented). It is also important for councils to have access to new burdens funding to resource providers effectively in order to uphold quality standards.

Communicating standards for commissioned providers

Commissioned providers operate under formal contracts, giving councils greater control over the performance and accountability of providers delivering schemes. These mechanisms are already in place through the procurement and contract management processes which ensure schemes are meeting local need and have effective KPI's. These processes should be adapted to the size and demands of each contract, and should be reviewed regularly to ensure compliance. Rather than introducing additional layers of oversight, councils should focus on leveraging existing processes effectively, avoiding unnecessary administrative burdens that increase costs for both councils and providers, especially before further national government guidance is published.

Standards that councils may consider for regulating commissioned providers include:

Standards	Description
Contractual performance metrics	• Achievement of outcomes specified in contracts, such as tenancy sustainment rates, reduced resident complaints, and improved resident independence. • Delivery of care and support services aligned with service-level agreements (SLAs) or agreed standards.
Resident outcomes	• Resident satisfaction scores collected through surveys or feedback sessions. Councils should have a variety of ways to collect this feedback in order to obtain as much of a voice as possible from the resident.

Standards	Description
	• Progression rates for residents transitioning to independent living or longer-term housing where appropriate.
Compliance and quality standards	• Adherence to national standards, such as Care Quality Commission (CQC) guidelines (if personal care is provided). • Compliance with local quality charters or service specifications set by the council.
Housing Benefit (HB) coordination	• Collaboration with HB teams to ensure that rental costs are in line with Housing Benefit regulations. • Ensure that rental charges for commissioned providers are appropriate for tenants receiving HB, with clear processes in place for aligning rental costs with LA HB policies. • Involvement of HB teams in reviewing and approving rental rates as part of the contract management and procurement process to ensure compliance and prevent overcharging or underfunding.
Financial accountability	• Demonstration of value for money through transparent reporting on how funds are utilised. • Evidence of efficient use of resources without compromising quality.
Regular monitoring and reviews	• Monthly or quarterly performance review meetings with council teams. • Participation in annual inspections or audits of housing and service quality. • Early reviews if any issues are identified. • Ensure adherence and performance under regulatory requirements such as the CQC or RSH.
Flexibility and responsiveness	• Ability to adapt services to meet changing resident needs or respond to feedback. • Timeliness in addressing complaints or issues raised by the council or residents.

Communicating standards for non-commissioned providers

Non-commissioned providers may operate without formal contracts with councils which can sometimes 'blur' the lines when communicating standards and measuring performance. Councils will utilise licensing (post-Act implementation), strong HB scrutiny processes and informal engagement. As issues with non-commissioned providers who expanded fast by leasing properties was a key trigger for the SHROA, it is important for councils to focus their efforts on this area, and not on areas which are already thoroughly quality checked.

Councils currently face limitations when seeking to apply oversight to non-commissioned providers, particularly in the absence of SHIP funding or formal contractual levers. Without licensing fully in place, there may be barriers in encouraging providers to engage with council forums or adopting measures such as resident surveys. For now, councils can still influence standards through soft levers, including offering referral routes or move-on support as an incentive for engagement. Where concerns arise, statutory tools remain available, such as HB scrutiny, environmental health enforcement (eg. category 1 and 2 hazards), and referring to relevant regulatory standards including the Regulator of Social Housing (RSH), Charity Commission or CQC (for care elements) depending on the provider type. These interventions should be utilised in line with a risk-based approach and proportionate to the nature of the quality concern identified. These approaches offer councils a layered response to quality concerns in the interim period before the full implementation of the Supported Housing (Regulatory Oversight) Act.

Standards that councils could focus on for non-commissioned providers could include, but are not limited to:

Standards	Description
HB Scrutiny	- Accurate and justifiable claims for HB rates. The LA needs to be satisfied that the eligibility conditions for HB have been met and that the rent and service charges are appropriate and not unreasonably high, based on what it costs to deliver the service. - Regular financial audits to identify inflated costs or unsupported expenditure.
Compliance with minimum standards	Safe, hazard free, and well-maintained housing in line with national and local standards.
Resident Safeguarding and Welfare	- Review of safeguarding policies to protect individuals with support needs from harm or exploitation. - Evidence of a supportive environment that prioritises resident wellbeing.
Inspection and monitoring	- Where appropriate, targeted visits dependant on level of concern, nature of the scheme, level of staff training and responsiveness to other communication channels. - Prompt resolution of any issues identified during inspections.
Engagement with the Council	Where appropriate, attendance at council-led forums or workshops for non-commissioned providers can be encouraged. This should not be mandatory as workshops may not be appropriate (for example for older people's services) or there may be no concerns about standards or services within a scheme run by an established provider who can demonstrate adequate levels of staff training.

Standards	Description
	• Openness to feedback and willingness to implement improvement plans when required.
Community Impact and Resident Feedback	• Evidence that residents feel safe, supported, and satisfied with their living arrangements. This can be achieved through mandatory resident satisfaction measures that all registered providers are required to collect. • Demonstration of positive community integration and reduced reliance on emergency services.

Supporting well-intentioned providers

Well intentioned providers often require guidance to navigate regulatory requirements or to achieve the service quality outlined in local charters and national standards. For commissioned providers operating under a formal contract, it is likely that there is a higher expectation on them to have a full understanding of the standards and regulatory landscape, as well as having greater internal resource to govern their processes. It is important to note that some non-commissioned providers may have previously been a commissioned service. Non-commissioned providers often deliver high quality schemes which are essential to supporting local housing capacity.

To support this cohort of providers, councils could consider providing advice and guidance on topics such as safeguarding, compliance and effective service delivery. A quick win for councils is to provide e-learning on these subjects to local providers. Facilitating advisory forums for providers to discuss local challenges, share best practices and receive updates on legislative or policy changes can be a great way to build trust. This can also support providers to feel confident raising concerns to the council or seeking clarification without the fear of punitive measures.

In addition to support and guidance, councils may also wish to consider more tangible forms of partnership to encourage provider buy-in. For example, housing options services could establish referral pathways into non-commissioned provision where the provider meets local standards. Councils might also work with providers to support residents' progression, such as jointly assessing individuals for move-on into social housing where appropriate. These practical steps can help bring providers into the fold, offering mutual value while maintaining oversight and accountability.

Strengthening assurance and proactive oversight

Robust oversight ensures that supported housing schemes meet the required standards. Councils can take a proactive approach in a number of ways. This can include developing processes to respond to complaints promptly and proactively scheduling planned inspections when contract managing commissioned providers. This is key to maintaining the balance between compliance and collaboration and it is

important for councils to instil a culture of trust with providers whilst also understanding that they are providing schemes for individuals with support needs, and that there is a high degree of commitment and responsibility that comes along with this. It is important that councils do not introduce inappropriate monitoring measures or duplication of other quality assurance regimes that will result in an additional burden on providers, as well as being distressing for residents. Co-designing quality assurance measures with residents could help to avoid these risks.

It is important to recognise that if Councils' actions are not carefully planned and co-ordinated with all relevant departments, they can have the unintended consequence of putting residents at risk of homelessness. This may happen for example where councils suspend benefits. It is important that councils consider all the tools available to them to investigate and act on areas of concern, using actions that are proportionate to the level of issue identified.

Councils having particular awareness of CQC and Ofsted standards is important for schemes which are providing personal care or services for young people.

The earlier sections regarding robust data strategies also support dialogue with providers, using insights and evidenced backed tools to plan the provision based on the forecasted demand for services. This is essential for coordinating the additional care and support services with the housing provider to ensure seamless working and positive outcomes for residents.

Finally, councils can proactively audit the evidence from inspections. It is best practice for these reviews to be conducted by multidisciplinary council teams (i.e. commissioning, housing safety, social care and HB) to arrive at fair and data informed decisions regarding provider management, and take a measured approach.

Best practice insight 9

Hull City Council has a preference for improvement notices over immediate benefit suspensions. This gives providers the chance to improve to meet compliance standards without destabilising the housing provision within the area. This also improves providers perception of the council, seeing them as a source of support instead of immediate punitive measures. Councils can address the risk of providers benefiting from extended tenancies in high-support settings by designing commissioning strategies that incentivise positive outcomes for residents.

Outcome-based contracts can reward providers for successfully transitioning residents to more independent living arrangements, focusing on measures such as the number of residents moving into lower-support housing and overall resident wellbeing. Building strong relationships with providers is key to reinforcing a shared commitment to resident progress, enabling open discussions about move-on planning and ensuring housing solutions are tailored to individual needs. This approach helps councils create a fair, outcome-driven system that prioritises resident independence and ensures providers remain focused on delivering sustainable, high-quality support.

Managing rogue providers and tackling exploitation

Some providers exploit the supported housing model, prioritising profit over resident welfare and not providing the relevant care and support services. Councils can utilise a strong MDT approach and cross departmental working to ensure alignment with relevant regulations such as building safety standards, house in multiple occupation (HMO) rules, safeguarding procedures and understanding of referral pathways. This will help councils to understand:

Is the provider delivering an eligible supported housing scheme, aimed at supporting individuals with support needs?

The key to managing this process comes back to clear communication and collaboration between internal council teams. It is imperative that the support quality and housing/property standards compliance teams working directly with providers are speaking to the HB teams in order to effectively audit and detect inflated rent or unsupported cost structures.

Following the SHROA's implementation, councils may introduce gateway approval processes for new providers to ensure that only those likely to meet national standards can operate a supported housing scheme. Developing relationships with neighbouring councils can provide the opportunity for intelligence sharing and proactively prevent 'bad actors' from moving between regions to evade oversight. For example, Hull City Council visits new schemes to check that what has been proposed in HB applications aligns with what the provider is delivering in practice before a scheme decision is made.

Councils can also develop processes to deal with existing providers and claims renewals. Where suspected rogue operators are involved, it is important to provide proactive support for residents to prevent illegal evictions and management of the rehousing process should be an absolute priority.

Best practice insight 10

Bristol City Council not only reduced subsidy losses through rigorous oversight of supported housing providers but has also effectively prevented homelessness through proactive supported accommodation development and strategic partnerships:

- Under the Better Lives in Bristol: Supported Housing Delivery Plan 2024–2029, the council has prioritised increasing supply of supported and temporary housing, time-limited accommodation combined with targeted support as part of temporary accommodation.
- Working with registered and specialist housing providers, Bristol has delivered modular and acquired properties specifically for people at risk of homelessness, including families and single people, embedded within homelessness pathways and Housing First pilots.
- Through new frameworks (e.g., Temporary Social Housing and Supported Family Accommodation) and training for PRS landlords in trauma-informed practice, Bristol has improved access to affordable options and strengthened tenancy sustainment for vulnerable households.

- The homelessness and rough sleeping strategy/action plan can be found here.

Balancing strategies for commissioned and non-commissioned providers

The approaches for managing commissioned and non-commissioned providers require tailored strategies, reflecting their distinct operational frameworks and the varying levels of oversight councils can exert pre-implementation of the Supported Housing (Regulatory Oversight) Act.

For commissioned providers, councils can prioritise regular performance reviews and evaluations that align with the terms of their contracts. These reviews provide an opportunity to monitor service quality, identify areas for improvement, and ensure providers remain accountable to agreed outcomes. Defining measurable performance outcomes, such as tenancy sustainment rates or resident satisfaction, can guide providers to prioritise quality in service delivery. Additionally, encouraging long-term collaboration through multi-year contracts and flexible funding arrangements creates stability for providers, enabling them to focus on continuous improvement rather than short-term targets. This approach can form part of a multifaceted innovative strategy to 'shape the market' rather than being dictated by it, encouraging long-term collaboration with trusted providers that can deliver the required quality.

Non-commissioned providers, operating outside formal contracts, necessitate alternative strategies for oversight and engagement. Licensing and accreditation schemes will provide effective frameworks for ensuring these providers adhere to consistent quality standards. It is important to recognise that some non-commissioned services were previously commissioned, or now form part of local housing pathways, with councils assessing needs and placing individuals directly into these schemes. As the SHROA is implemented, councils can further strengthen relationships with non-commissioned providers by hosting regular engagement forums, which offer opportunities to discuss challenges, share updates on regulatory requirements, and align on expectations. Targeted support is also crucial for smaller non-commissioned providers, who may lack the resources or expertise of larger organisations. Offering guidance on training and access to practical tools can help these providers enhance their service delivery without imposing an undue administrative burden.

Kirklees Council facilitates best practice sharing, networking, and discussions on key issues to improve supported housing provision. The Council has hosted sessions on employment and skills, where colleagues have highlighted work opportunities for people in supported housing, as well as awareness-raising initiatives covering Domestic Abuse Risk Assessment and Management Meetings (DRAMM), Multi-Agency Risk Assessment Conferences (MARAC), safeguarding, and modern slavery. To support service development, Kirklees Council has also explored the question 'What does good look like?' as a foundation for its Charter, which remains in progress. Future forums will focus on security of tenure (licence vs tenancy), welfare visits, the Equalities Act, and move-on options, with a potential discussion on the licensing consultation if it has been published.

Maintaining the balance

To maintain the delicate balance between collaboration and compliance, councils can develop a culture that focuses on continuous improvement. Framing oversight as an opportunity for growth rather than punitive measures supports providers in meeting their objectives while promoting a shared commitment to high standards. Recognising and celebrating providers who excel in service delivery is another way to promote best practices and encourage others to follow suit. Finally, establishing feedback loops that invite providers to share their experiences and insights can help councils refine their processes, build stronger partnerships, and ensure their strategies remain relevant and effective.

Best practice insight 11

Coventry City Council has implemented a proactive approach to maintaining high standards in supported housing by appointing a dedicated quality officer. This role is central to auditing supported housing providers against bespoke local quality standards developed in consultation with stakeholders. The quality officer:

- Engages directly with providers, conducts regular assessments, and collaborates on improvement plans where necessary.

- Takes a supportive but firm approach to improve compliance across the sector and has enabled Coventry to take decisive action, including the closure of three non-compliant providers in recent years.

- Ensures that providers deliver safe, high-quality housing while strengthening trust and collaboration.

Coventry also offers:

- Stakeholder planner - free and accessible training delivered by stakeholders, for stakeholders (e.g. Drug and Rehabilitation services providing training for housing and support providers).

- Pre-Eviction panel - forum for providers to discuss individual cases who may be faced with eviction with the aim of prevention. This is attended by key services in the city, with input from probation & mental health services
- Vulnerable persons and complex needs forum - MDT meeting held monthly to coordinate a response for people at risk of homelessness with multiple complex needs.

- When onboarding new providers, the specified exempt accommodation (SEA) team request a breakdown of support staff and their hours to evidence that the provider satisfies the definition of SEA under HB regulations.

- Introduced an online portal for feedback of SEA. This has encouraged residents, stakeholder and third party organisations to share experiences in between SEA team visits

This approach directly benefits residents by creating stable, well-regulated housing environments and reducing instances of inadequate service delivery.

An example SEA support audit checklist is included in appendix 1.

Managing relationships with registered and non-registered providers

Councils often work with a mix of Regulator of Social Housing (RSH) registered and non- registered supported housing providers to meet local needs, but this can lead to challenges, particularly in relation to subsidy loss. While registered providers are subject to additional regulatory oversight, many non-registered providers also deliver high-quality support and play a vital role in maintaining local housing capacity. If the exempt accommodation is provided by a registered provider, the LA can claim 100 per cent subsidy for eligible HB payments.

When the accommodation is provided by a non-registered provider, the subsidy arrangements are different, regardless of the nature or quality of the service. These subsidy arrangements mean that councils may face financial shortfalls when housing benefit is paid to non-registered providers, regardless of the quality of the service.

Where market conditions require councils to continue working with non-registered providers, it is vital to focus on ensuring claims are robustly evidenced. Strong collaboration between HB teams and quality assurance officers can help determine whether claims clearly demonstrate eligibility, reducing the likelihood of disputes. In the interim, this joint approach provides assurance.

While the DWP is not currently in a position to agree changes to subsidy rules, councils, providers and wider sector bodies have consistently raised concerns that the current arrangements are increasingly difficult to justify and will be increasingly so as all providers will be subject to licensing regardless of registration status. There is a shared view across the sector that aligning subsidy eligibility with quality standards would support a more rational and equitable funding model.

Such a change could free up resources for councils to invest in commissioning high-quality supported housing, making licensing easier to implement, improving the value for money of housing benefit expenditure, and strengthening local oversight. In the meantime, councils must continue to balance decisions around affordability and local need. This will include commissioning non-registered providers where they offer the best fit for local priorities, even where this results in higher subsidy loss.

Councils should aim to balance the need for financial sustainability with ensuring high-quality provision, recognising that non-registered providers are often critical in delivering much-needed housing capacity for residents.

When councils review supported housing provision and identify a need for more housing owned by registered providers, they can engage directly with those already building through Homes England grant funding. Finding out which registered providers are active in the area and discussing specific housing requirements can create opportunities for alignment and collaboration that is both high quality and affordable. This proactive approach helps ensure that new supported housing

developments meet local priorities while contributing to a more sustainable and financially viable housing market.

Discussions during the engagement process have highlighted key considerations for licensing under the SHROA once implemented. While the final structure of licensing is yet to be determined, several themes have emerged:

- Keeping costs low is essential. Councils should aim to minimise these costs to avoid placing additional financial pressure on residents.
- Collaboration across councils is also crucial. Since every LA will need a licensing scheme, developing separate frameworks in each area could create unnecessary complexity and administrative burdens.
- Councils are encouraged to take a risk-based approach to licensing, once the SHROA is implemented. It is important to note that this could take a number of years to fully come into effect. For the time being, Councils can take into account current regulatory frameworks and implement effective contract management to inform their decision processes.

These points reflect the insights gathered from engagement discussions and are not definitive policy positions. The final licensing framework will be determined through the implementation of the SHROA and LAs can await further instruction from the forthcoming national guidance.

Figure 5. Compliance & collaboration balance
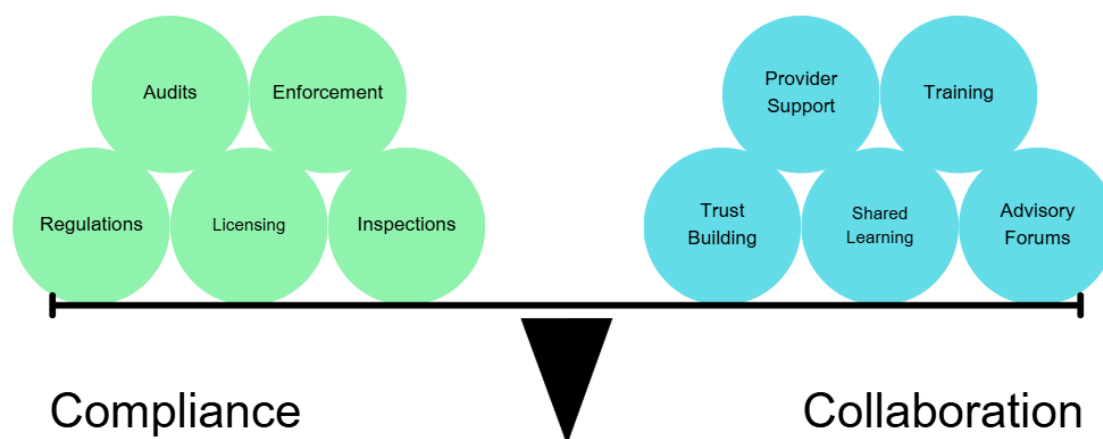
Reviewing HB claims for supported housing

Councils face an increasingly complex task in reviewing HB claims for SEA. While scrutiny is necessary to ensure value for money and compliance with regulations, the way this is done must be fair, proportionate, and structured to avoid destabilising supported housing provision. The challenge is particularly acute for LA HB teams, which must balance financial oversight with the need to maintain essential housing services for residents with complex needs. This section provides guidance on how councils can apply the HB regulations effectively, engage with providers constructively, and ensure that SEA claims meet the necessary standards without unintended consequences for residents.

Understanding the specified exempt accommodation HB regulations

In specified exempt accommodation (SEA), the resident claims HB to cover eligible rent and eligible service charges. To be eligible for HB under the regulations, the accommodation must meet the definition of specified accommodation, a broad category covering four types: (1) Exempt Accommodation, (2) Managed properties, (3) Refuges,(4) LA Hostels.

These types fall under specific regulations, particularly regarding housing benefits, which includes the provision of more than minimal care, support, or supervision (with the exception of the separate 'refuges' category). While these support services themselves are not funded through HB, their presence is essential in determining eligibility. Where the property is not classified as specified accommodation and the resident is under pension age, claims for housing costs are usually made through universal credit instead.

LA HB teams are responsible for:

- Assessing SEA claims to ensure they meet the criteria set out in HB regulations.
- Determining whether rent levels and service charges reflect real and reasonable costs in relation to the accommodation provided.

DWP's 2022 HB guidance for supported housing claims consolidated previous guidance and clarified expectations around the care, support, and supervision requirement. The application of this guidance when assessing care, support and supervision has not been consistent, leading to concerns from providers about the variation in decision-making across different LAs.

Improving consistency of decision-making on HB claims

Councils need a structured and evidence based approach to reviewing applications.

Good practice includes:

a) Establishing clear internal processes for reviewing SEA claims

- HB teams should have standardised templates and checklists for assessing SEA claims. This ensures a consistent approach and prevents delays.
- Decisions should be documented clearly, with justifications recorded in case of challenge or appeal.

b) Cross-department collaboration

- HB teams should work closely with commissioning teams to align decisions with wider local supported housing

strategies.

- Early engagement between HB teams and providers can prevent unnecessary disputes by setting clear expectations on eligible costs and required support levels. HB teams should work with providers to understand the costs involved in providing the service, basing decisions on evidence rather than assumptions.
- Homelessness teams should also be involved in shaping decisions, particularly where SEA placements intersect with statutory duties. Their insight can help ensure SEA is being used appropriately within the local housing pathway and supports wider prevention.

c) Conducting reasonable scrutiny without unnecessary delay

- Claims should be reviewed promptly while ensuring that due diligence is carried out. Unnecessary delays can impact providers' financial stability and residents' security.
- Where concerns arise, councils should engage with providers at the earliest stage rather than rejecting claims outright.

Managing disputes and provider engagement

Some providers have raised concerns about increased HB scrutiny leading to funding instability, with long delays in decision making, particularly where councils have rejected claims or imposed strict conditions. However, councils have a duty to ensure public funds are spent appropriately and that SEA providers meet their obligations in delivering care, support or supervision.

To manage disputes effectively:

- Early engagement is key: HB teams should aim to have face-to-face discussions with providers to better understand the nature of the scheme,where there are concerns, rather than relying solely on written correspondence.
- Use improvement plans where possible: Rather than immediately rejecting a claim, councils should consider allowing a period for the provider to demonstrate compliance.
- Maintain a fair and transparent appeals process: Councils should ensure that the appeals process and the process for submitting further evidence is clear.

Future changes and preparing for the SHROA

The introduction of the SHROA will bring significant changes to how supported housing is regulated. DWP has consulted on the possibility of linking HB entitlement to the new licensing regime and defining care, support and supervision within the HB regulations, which could create greater consistency in how councils review claims.

Councils can:

- Monitor developments around licensing and HB regulatory changes and prepare for potential adjustments to how claims are reviewed.
- Ensure HB teams are aligned with strategic housing teams so that the council's supported housing market remains sustainable and financially viable.
- Engage with DWP where necessary to clarify emerging policy changes and advocate for additional support where councils face resource constraints.

An example HB claims checklist can be found in appendix 2.

Managing HB suspensions in supported housing

Councils are operating in a difficult landscape, balancing financial oversight with the need to protect residents and ensure that SEA delivers real value. Proportionate scrutiny of HB claims is necessary to prevent poor quality provision and misuse of public funds, but it also presents challenges. Where claims are refused, there is a risk that residents could be displaced, creating additional pressures on homelessness services. A structured and proportionate approach is essential to ensure compliance without destabilising services.

When addressing concerns about support levels, councils should prioritise engagement with providers, offering clear expectations and an opportunity for improvement before taking action on HB claims. Hull has used a three-month improvement period, allowing providers to either enhance their support offer or make alternative housing arrangements for residents. This approach balances the need for compliance with a practical pathway for providers to adapt, ensuring that enforcement is only used as a last resort.

Early and transparent communication with providers is key to managing HB scrutiny effectively. Councils that have worked closely with providers before suspending claims have found that face-to-face discussions and structured improvement plans can resolve issues without causing widespread displacement. Engaging with housing options teams and other SEA providers can also help mitigate homelessness risks by ensuring that residents threatened with eviction have access to alternative accommodation and support.

It is also critical to frame accountability correctly. While HB decision-makers must ensure compliance with regulations and case law and HB rules, landlords and support providers are responsible for delivering the required support.

Recent government guidance has acknowledged the importance of scrutiny as a safeguard rather than a barrier to support. While councils must act within legal frameworks, it is equally important to address the practices of unscrupulous landlords exploiting the system. In some cases, SEA providers have been found to charge excessive rents and support fees to residents while delivering substandard services.

A case by case approach is essential when addressing failing SEA schemes. In Leeds, every HB decision related to supported housing has been upheld when challenged, demonstrating the importance of robust evidence collection. Before making a final decision to suspend HB claims, councils should:

- Conduct detailed assessments to document gaps in support provision.
- Provide improvement opportunities for providers before enforcement action.
- Offer clear guidance on compliance and the necessary steps to maintain funding.
- Work closely with housing options teams to minimise the impact on residents.

Councils can apply scrutiny where necessary if it is reasonable and proportionate, but it is important to be mindful of the impact HB decisions can have on residents. A well-managed approach focused on improvement and evidence-based decision making helps to raise standards across the sector while protecting residents.

Best practice insight 12

Derby City Council recently faced a situation where HB payments had to be suspended for a well-regarded provider of SEA. The decision was made in accordance with case law and HB guidance. The provider, which housed around 50 residents, was engaged face-to-face on multiple occasions to discuss the issue, explore available options, and ensure that both the provider and residents understood the potential impact.

A key priority for the council was to minimise disruption for residents. Housing options teams and partner SEA providers with available vacancies were brought in to help mitigate the risk of homelessness. As a result, only nine residents ultimately required rehousing through the housing options route.

This case highlights the importance of working collaboratively with providers to resolve concerns wherever possible. Rather than relying solely on enforcement, Derby City Council prioritised improvement plans and provider engagement to support compliance, using HB suspension only as a last resort. This approach ensured that HB scrutiny was applied fairly, without destabilising essential accommodation for residents with support needs.

Cornwall Council: Reducing subsidy loss through umbrella RP arrangements

Cornwall Council adopted a targeted approach to reduce its £4.2 million annual Housing Benefit (HB) subsidy loss. Through a cross-service programme, the council supported CICs, charities, and other providers to lease schemes to established umbrella RPs, enabling claims to qualify under 'specified accommodation' rules and securing full subsidy entitlement. This pragmatic, provider-led model included a dedicated internal team, milestone-based transition funding, market mapping to prioritise high-impact providers, and workshops to broker relationships with umbrella RPs. Peer examples, such as Harbour Housing's successful transition, reassured others of the process's benefits.

The initiative has already transitioned 62 per cent of affected stock, cutting the subsidy loss from £4.2 million to £1.5 million per year and delivering £2.7 million in annualised savings, with a target of 80 per cent transition within a year. Most non-RP providers are now engaged or in final partnership negotiations. Providers have reported improved oversight, clearer eligibility, stronger operational security, and enhanced quality standards, supported by the guidance and due diligence of partner RPs. HB payments continued without disruption, maintaining provider and resident confidence throughout the process.

Beyond addressing subsidy loss, Cornwall's approach has strengthened relationships with local providers, building trust, improving dialogue, and positioning the council as a supportive partner. Providers now feel more prepared for forthcoming regulation and licensing, citing the RP transition as a catalyst for better compliance and service sustainability. The model shows that with early investment, strong collaboration, and peer-led engagement, councils can deliver both financial savings and long-term improvements in supported housing quality.

Compliance and collaboration balance checklist

Immediate actions

Action	Notes	Complete?
Review the DWP's HB guidance	• Ensure key staff are familiar with the 2022 guidance for supported housing claims and the relevant regulations. • Pay particular attention to definitions of Specified Accommodation and the care, support and supervision requirement.	☐
Review current internal processes for assessing HB claims	• Map out the end-to-end process to identify inefficiencies or inconsistencies. • Ensure procedures align with national guidance and include steps for ongoing review at the three month point. • Clarify roles between HB teams and quality assurance functions to support joined-up decision making.	☐
Identify providers presenting the highest safeguarding or quality risks.	• Use available intelligence to prioritise oversight activities without overburdening providers delivering safe, quality care. • Ensure a process is in place for assessing and quantifying provider risk.	☐
Review existing expectations shared with providers.	• Ensure current standards, charters or expectations are clearly	

Action	Notes	Complete?
	documented and shared with both commissioned and non-commissioned services.	☐
Introduce clear messaging about the purpose of oversight activity.	• Communicate that monitoring is supportive and risk-based, not punitive, to encourage open dialogue.	☐

Short term actions

Action	Notes	Complete?
Develop or update a local quality charter for supported housing.	• Co-design with providers where possible, incorporating national supported housing principles and minimum service expectations.	☐
Introduce proportionate monitoring tools based on provider risk level.	• Use lighter-touch monitoring for low-risk providers, and more detailed checks for services with known issues or high-risk groups.	☐
Create a shared log of provider concerns and good practice.	• Allow cross-department access to maintain consistency in how providers are assessed and supported.	☐
Identify opportunities to engage early with providers	• Are processes in place for engaging early with providers, including clear mechanisms for improvement plans to address concerns and avoid unnecessary claim rejections?	☐

Medium and long-term actions

Action	Notes	Complete?
Continued awareness of developments linked to the Supported Housing (Regulatory Oversight) Act	• Monitor for updates including the forthcoming national guidance, ensuring HB policies remain aligned with new regulations	☐
Embed risk-based oversight into contract monitoring and informal engagement	• Ensure both commissioned and non-commissioned providers are subject to the same transparent, risk-informed expectations.	☐
Train internal teams on applying quality standards in a collaborative way	• Help staff understand how to conduct oversight that is rigorous yet constructive, especially in provider visits.	☐
Establish a multi-agency panel to review high-risk schemes	• Bring together HB, safeguarding, commissioning and housing leads to coordinate interventions and support for struggling providers.	☐
Use provider insight to inform the council's contribution to national oversight developments	• Feed evidence into national standards and licensing frameworks as they evolve.	☐

Section 5: Residents at the centre of supported housing

It is clear from our research that everyone involved in supported housing is committed to achieving the best outcomes for residents. However, the process is inherently complex, with competing priorities and operational challenges. In such a demanding environment, it can be easy to lose sight of the resident's perspective. Supported housing should be more than just providing accommodation; it must also serve as a platform for stability, growth, and a pathway to independence. This section explores how councils can navigate these complexities while keeping the residents' voice central to ensure meaningful and sustainable outcomes.

Understanding resident's needs

If councils establish a strong foundation by getting the key elements right which are outlined in the first four sections: strategy and needs assessment, ways of working internally, ways of working externally, and achieving the right compliance and collaboration balance, then matching an individual's needs becomes significantly easier. With these building blocks in place, councils are better equipped to ensure that supported housing schemes are adaptable and responsive to each resident's unique circumstances. This includes creating the conditions for thorough individual needs assessments, allowing for a deep understanding of residents' physical, mental, spiritual, and social support requirements, and working closely with care and support providers, healthcare professionals, and voluntary organisations to build holistic, person-centred support plans.

It is important for councils to consider the diverse demographics of residents, including older adults, individuals with disabilities, people recovering from substance misuse and those fleeing domestic abuse. This links back to the need for a population needs assessment outlined in the first section, enabling councils to develop a deep understanding of the needs and demographics of their area.

Ensuring resident voice and co-production

A key question that councils can ask is:

Are we actively listening to the needs of residents and ensuring their voices shape the services they rely on?

Residents should not just be recipients of services but active participants in shaping them. Councils can integrate the residents voice in decision-making processes by creating regular opportunities for feedback, such as surveys, focus groups, or resident advisory panels. These mechanisms empower residents to share their experiences, highlight issues, and propose improvements.

Co-production takes this a step further by involving residents in the design and evaluation of supported housing schemes. Collaboration between residents, councils and providers can create services that are more relevant, effective, and aligned with resident needs.

Best practice insight 13

Councils, in partnership with providers, can place residents at the heart of supported housing by developing personalised, resident-focused practices into the design and delivery of services. This begins with thorough individual needs assessments, ensuring that housing and support services are tailored to each resident's unique circumstances, such as their health, employment, or social needs. Regular feedback mechanisms, such as resident advisory panels or focus groups, can empower residents to voice their experiences and shape improvements in service delivery. Co-production, where residents are actively involved in designing supported housing schemes, ensures that services genuinely reflect the needs of the people they are intended to support.

In addition, councils can work with providers to create psychologically informed environments, which consider the emotional and social wellbeing of residents as integral to their housing experience. Guiding providers to train staff on adopting trauma-informed approaches and cultivating inclusive, supportive communities within housing schemes can significantly improve resident outcomes. Finally, councils can develop clear move-on pathways, helping residents transition to more independent living where appropriate, while ensuring those with long-term needs receive consistent, high-quality support.

Promoting independence

Supported housing can be a stepping stone towards greater independence wherever possible. Councils can work with providers to develop structured pathways for residents, enabling them to build life skills, access education or employment, and transition to more independent living arrangements when appropriate. For some residents, particularly those with long-term or complex needs, supported housing may represent a stable, permanent solution.

Outcomes can focus not only on tenancy sustainment but also on measures such as improved mental health, reduced reliance on crisis services, and increased engagement with the wider community. Councils play a crucial role in driving an outcome focused approach amongst providers, ensuring this is built into their commissioning processes. Clear expectations around measurable outcomes can be built into contracts and service agreements to ensure providers prioritise resident wellbeing and long-term independence. Regular performance reviews and ongoing collaboration with providers are also essential to maintain this focus and ensure supported housing schemes deliver meaningful benefits for residents.

Safeguarding residents and upholding rights

Residents in supported housing are often individuals with complex support needs, making safeguarding a fundamental priority. Councils can ensure robust safeguarding protocols are in place, protecting residents from exploitation, abuse, or neglect. This includes regular monitoring of provider safeguarding processes, clear escalation routes for concerns, audits of safeguarding training completion rates, and

encouraging clear whistleblowing procedures, particularly among providers identified as higher risk.

Equally important is upholding residents' rights. Councils can ensure that residents understand their entitlements, such as access to support services, the right to safe and decent housing, and pathways for raising complaints or concerns.

Measuring outcomes

Supported housing should be more than just providing accommodation, it needs to be outcomes focused. Councils are key to promoting this outcome focused approach amongst providers. In order to evaluate the ongoing effectiveness of supported housing schemes, these outcomes need to be measurable, meaningful and reflective of resident priorities. Key metrics which could be included in commissioning contracts as KPI's, where appropriate to resident needs and desires (specially where support plans are co- produced) include:

- Stability: increased tenancy sustainment rates and reduced evictions/decommissioned services
- Wellbeing: Improvements in residents mental and physical health
- Independence: greater uptake of education, training and employment opportunities, as well as successful transition into 'move on' pathways
- Community integration: Enhanced participation in social or community activities

Nurturing a culture of respect and dignity

Respecting residents' dignity and individuality is central to the delivery of supported housing, as highlighted in numerous discussions, best practice examples and case studies throughout the research. Supported housing is not just about providing a service; it is about creating a home where people feel valued, supported, and empowered to lead fulfilling lives. As one council reflected during consultation, "It's about more than meeting standards; it's about making a real difference to people's lives by giving them the tools and confidence to thrive." This sentiment underscores the shared commitment within the sector to prioritise residents and deliver meaningful outcomes.

Research and best practices consistently show that placing residents at the centre of supported housing strategies leads to better outcomes. This includes ensuring schemes promote independence, include resident voices in decision-making, safeguard rights, and measure success in ways that reflect what truly matters to residents.

Councils can reflect on how their supported housing system not only meets regulatory standards but also helps to transform lives.

A key question to consider is:

Have we created a system that places dignity, wellbeing, and independence at its core, ensuring that housing schemes support not just compliance, but real, lasting impact for residents?

Figure 6. The Resident

The resident

Financial security

Mental and physical wellbeing

Community and social inclusion

Housing stability

Independence and life skills

Safety and safeguarding

The resident checklist

Immediate actions

Action	Notes	Complete?
Review how individual needs assessments are conducted on referrals into supported housing	• Ensure assessments cover physical, mental, social, and cultural needs. Link this to data held by social care, healthcare, and community partners.	☐
Map existing resident feedback channels across commissioned and non-commissioned services	• Identify whether regular surveys, complaints logs, exit interviews, or panels exist and are being reviewed by the council.	☐
Introduce a minimum expectation for capturing resident feedback annually	• Set expectations for providers to gather and report on resident experience at least once per year using agreed formats. • RPs will already be doing this to meet regulatory requirements so this can be used as evidence rather than adding an additional layer through requiring a different format	☐
Move on pathway assurance	• Do these pathways focus on developing skills and independence where appropriate?	☐

Short term actions

Action	Notes	Complete?
Pilot resident involvement panels in a small number of supported schemes.	• Use these to test co-production approaches and gather real-time insight on service gaps or ideas for improvement.	☐
Create a practical guide for providers on inclusive engagement.	• Help providers tailor engagement for groups such as people with learning disabilities, sensory impairments, or trauma backgrounds.	☐
Work with care and support providers to embed outcome-focused support planning.	• Ensure residents' goals (eg. stability, training, move-on) are central to support plans and regularly reviewed. • Are these services able to meet the demand of residents that have been identified in individual needs assessments?	☐

Medium and long-term actions

Action	Notes	Complete?
Develop a cross-provider resident satisfaction framework.	• Create a consistent tool to gather, benchmark and publish resident satisfaction data across schemes.	☐
Include co-production principles in future contracts or funding arrangements.	• Incentivise resident involvement in service design, delivery and review.	☐
Use resident feedback trends to shape strategic commissioning priorities.	• Draw on co-produced insight to inform housing mix, support	

Action	Notes	Complete?
	models, and investment decisions in supported housing strategy updates.	☐
Establish an annual resident-led review of supported housing provision.	• Enable a cross-scheme group of residents to assess quality themes and report findings to senior leaders or scrutiny panels.	☐

Conclusion

The implementation of the SHROA provides a turning point for councils to take a more strategic, accountable and resident-focused approach to supported housing. The challenges that prompted the SHROA, ranging from the rapid growth of unregulated provision to inconsistent oversight, require a coordinated local response that treats commissioned and non-commissioned provision as part of the same housing ecosystem. This guidance has been developed to help councils navigate this shift, offering practical tools and proportionate actions that can be tailored to different local starting points.

Commissioned supported housing services are already subject to contractual requirements and performance oversight. Councils are generally able to shape delivery through monitoring and ongoing provider relationships. However, this guidance also acknowledges that many of the most pressing risks and gaps sit outside formal commissioning arrangements. Non-commissioned supported housing, particularly schemes that have grown rapidly through leasing arrangements or operate outside referral pathways, may still house people with support needs, but with less clarity on quality standards, safeguarding arrangements or financial assurance.

Strengthening the local system requires a joined-up approach to both types of provision. Early steps can include aligning internal teams around shared expectations for quality and compliance, and ensuring that HB, commissioning, housing, and environmental health colleagues have visibility of both commissioned and non-commissioned schemes. Councils can also use referral pathways and housing options teams to influence which providers receive placements, reinforcing good practice and reducing reliance on schemes that do not meet local standards. Engaging providers in practical forums, peer learning opportunities and voluntary quality assurance programmes can also build trust while driving up consistency.

Licensing will help address oversight gaps, but it is only one part of a wider system of accountability. In the interim, councils already have access to important tools. These include proportionate scrutiny of HB claims, implementation of housing standards through environmental health teams, and partnership with national regulators such as the Charity Commission, CQC and the Regulator of Social Housing. Using these levers consistently, and focusing them on areas of highest risk, allows councils to maintain resident safety and financial integrity even before new licensing powers take effect.

A central message throughout this guidance is that improvement does not always require formal enforcement. Much can be achieved through soft levers: transparent communication, supportive relationships, data sharing and resident feedback. Councils that make standards visible, offer clear routes for providers to raise concerns, and model proportionate, fair oversight are more likely to build a sustainable local market of providers that can meet diverse needs without exploitation or risk.

The resources within this guidance are intended to help councils move from insight to action, whether they are just beginning to map their supported housing landscape or already implementing advanced oversight mechanisms.

Ultimately, supported housing is not only a form of shelter. It is a pathway to safety, stability, and independence for people with some of the most complex support needs in our communities. Councils are uniquely placed to set the tone for how that support is delivered. Through careful planning, proportionate oversight and focus on partnerships and outcomes, LAs can create supported housing systems that are transparent, inclusive and fit for the future.

Appendix 1: Example SEA support audit checklist

Property facilities

Date:	
Council Officer:	
Provider:	
Provider Representative:	
Address:	
Property Support Worker/Manager:	
CCTV at the property? Location?	
Self-contained or shared?	
Units:	
Tenants:	
Notice Board (Provider details, emergency contact, local information, useful contacts, Health, and Safety)	

Wi-Fi at the property?	
Who cleans the property? How often?	
Who is responsible for the Maintenance? (In house operative, external)	

Property descriptions

Cosmetic appearance of the building:	
Bedrooms:	
Communal Living space:	
Kitchen:	
Bathrooms:	
Front/Back Garden:	

Recommendations:	

Support staff and paperwork

Support Staff and Hours Worked:	
Do all staff have current DBS checks? Have they been seen?	
Staff qualifications/credentials	
Do any staff administer medication? Are they qualified?	
24/7 Emergency Contact and Cover	
Sign Up - Support Plan	

Monthly Reviews	
Daily Logs	
Supporting documents requested	
GDPR followed? How are files stored? Are they secure?	
Recommendations	

Residents and support

Support Needs of residents	
Type of support provided	
Evidence of Support (How is this documented)	

Outside agencies used	
Do residents engage with staff/services?	
Have staff seen any tangible results from support?	
Are there regular house meetings? Are minutes taken?	
Are there extra activities on offer?	
Are any residents working or in training?	
How is anti-social behaviour approached?	
Resident Comments:	
Staff comments:	
Recommendations:	

Appendix 2: Example HB claims checklist

	Documentation	Provided
1	**Housing Benefit (HB) Supported Accommodation Questionnaire** (SEA Q.) • Form to be completed by the landlord in respect of the accommodation / portfolio of accommodation in question • Answers should be relevant to the individual client accommodated at a single property / all clients that are to be accommodated across a portfolio of properties • Additional information may be requested	☐
2	**Client Information** • Client's accommodated at a property specifically sourced for their needs , for example arrangements that involve placement by a social worker or the NHS, background information from personnel within the claimants support network (ie social worker or an NHS representative) is required to demonstrate their need for a high level of care support and supervision	☐
3	**Property Questionnaire**	

4	**Service Level Agreement** - for arrangements where the tenant (s) received care and support from a resident care providing organisation
	• To demonstrate agreements between landlord and support provider
	• If the landlord is contracted for support provision by a LA, and they contract this to a Care Provider at the accommodation, confirmation of the arrangements are required to show:
	   ○ What the landlord is responsible for and what they are paid by the LA for this
	   ○ Detail and evidence of the funding recharged within the SLA for this
		☐

5	**Lease** where property not owned by housing provider • Required to establish the landlord holds the proprietary right to let the accommodation and to contribute to decision making in relation to the reasonableness of the rent for HB purposes • Lease should be signed by all parties to the agreement	☐
6	**Rent breakdown** • Full-service charge breakdown	☐

		Elements of the breakdown may be queried in order to justify the cost	
7	**Tenancy agreement** • The agreement should be complete and hold the value of the rent the tenant has agreed to pay for their accommodation • It should be signed by all parties to the agreement • Where the tenant is unable to sign please provide a statement from their social worker regarding their capacity to do this	☐
8	**HB application** • Required within the first week of tenancy / move in date, via the landlord/provider of the supported accommodation IMPORTANT: Do not delay sending the form if all information is not available at the time, this can be provided later • Evidence / details of tenant financials / appointee etc	☐
9	**Individual Need Questionnaire** • To confirm the tenant's need for care support and supervision that is linked to the accommodation • The tenant's needs may have been established from client information provided via a social worker or NHS representative (as listed under point 2 above).	☐

Notes: supporting accurate and timely HB decisions

This section outlines the documentation and processes that councils can request to support lawful and efficient administration of HB claims for SEA. It expands upon the checklist and can be tailored locally.

Before tenancy start

Documents one to six in the checklist should ideally be submitted prior to the resident moving in. These documents establish the property's eligibility, the provider's intention to deliver support, and the proposed rent breakdown. Early provision allows the HB team to determine which HB regulations apply and assess whether the proposed rent is reasonable. Where documents are received in good time, a provisional decision can be issued to facilitate a smooth tenancy start. Councils may also choose to arrange a meeting with the provider at this stage to clarify any outstanding issues or confirm eligibility criteria.

After tenancy has started

Documents 6 to 9 should reflect any changes since the initial submission and confirm final tenancy details. The tenancy or licence agreement, proof of identity, proof of income, and two full months of bank statements should be provided within the first week of move-in. These are used to confirm the tenant's legal liability to pay rent and to assess income and capital. Where there is a delay in application, councils may backdate HB by up to one calendar month, provided there is continuous good cause for the delay.

Where the scheme has no formal decision

If the supported housing scheme has not yet been formally recognised as SEA, the HB team will require evidence that the resident has a genuine need for this type of accommodation and that care, support or supervision is linked to the tenancy. This might include an initial needs questionnaire, a referral from a support agency, or case records from a social worker. The HB claim can be paid once this information, along with other required proofs, is received and verified and that the HB decision-maker undertaking the assessment is satisfied with the evidence provided and that the HB regulations have been met.

Three month review of claims

Three months after payment begins, further documentation will be requested to demonstrate that more than minimal levels of care, support and supervision are being delivered. At this point, providers will be asked to submit three months of case notes, along with updated documents such as a Support Plan, Needs Assessment, and Risk Assessment. This review supports ongoing assurance that SEA criteria continue to be met and that HB remains payable under the correct regulation.