

Consultation Questions: East Suffolk Council response:

Supported Housing (Regulatory Oversight) Act Consultation

Closing Date: 15th May 2025

Further Information: <https://www.gov.uk/government/consultations/supported-housing-regulation-consultation/supported-housing-regulation-consultation>

Consultation Questions:
1. In which capacity are you completing these questions? Please tick all that apply.
Local Authority
2. Please enter the following information:
Name: [single line text] Email address: [single line text] Organisation: [single line text]
East Suffolk Council
3. If responding as an individual, where do you live? If you are responding as an organisation, where are you based?
East Of England
4. Landlord or provider only: How many supported housing units (beds) do you own or manage?
1-19 20-49 50-99 100-499 500-1000 1001 +
N/A
5. Do you agree that the licensing regime that the government is proposing to introduce under powers in the Act should apply to all supported housing (supported exempt accommodation as defined in the Act)? This definition is the same as 'specified accommodation' in Housing Benefit regulations. [Fully agree/partly agree/do not agree/do not know.] If you do not fully agree please explain why here. [Free text.]
Fully agree
6. Do the principles reflect the core elements of a good quality support service? [Strongly agree/partly agree/neither agree nor disagree/partly

disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Agree
7. Do you have suggestions for any additions to the principles as described above? [Free text.]
No additional suggestions.
8. Do you agree with the person-centred support standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here.
Strongly Agree - A person centred approach builds on the strengths of the individual to enable them to achieve the outcomes that matter to them. It also supports with minimising repeat admissions into supported accommodation.
9. Do you agree with the examples of evidence that are listed? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Strongly agree
10. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies? Please specify what the information is currently used to evidence. [Free text.]
Business Continuity plans to enable long term sustainability of service.
11. Do you agree with the empowerment support standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Strongly agree, feedback from service users is key to ensure their needs are met.
12. Do you agree that providers should give residents an information pack when they move into their accommodation? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
<p>Strongly agree</p> <p>Information such as: -</p> <ul style="list-style-type: none"> • the full address of the property. • the Service Provider's address and contact details. • the Service Provider's out-of-hours emergency contact details • what to do in case of fire or flood (if relevant). • general house rules/group living rules and how customers are involved in determining them. • how customers' views shape the service, support and monitoring of the service and the opportunities for their voice to be heard. • security of the premises.

<ul style="list-style-type: none"> • the health, safety, and security policies, including any evacuation procedures. • how to access advocacy. • how to report concerns and complaints. • rights and responsibilities including the clear, structured, and well explained process for the termination of support/accommodation.
13. Do you agree with the examples of evidence that are listed? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Agree
14. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies. Please specify what the information is currently used to evidence. [Free text.]
Move on rates, return to service, engagement
15. Do you agree with the environment support standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Strongly agree, residents should be placed in accommodation that is suitable to their needs and that it is in balance with other residents residing in the same provision.
16. Do you agree with the examples of evidence that are listed in relation to the environment standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Strongly agree
17. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies. Please specify what the information is currently used to evidence. [Free text.]
What has been included seems sufficient.
18. Do you agree with the staff and safeguarding support standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Agree

<p>19. Do you agree with the examples of evidence that are listed in relation to the safeguarding standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree - staff should have relevant skills and experience are available to deliver an appropriate service which meets the needs of the service user.</p>
<p>20. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies. Please specify what the information is currently used to evidence. [Free text.]</p>
<p>The Service should promote Recovery, Social Inclusion, and Independence</p>
<p>21. Do you agree with the local need support standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>
<p>22. Do you agree with the examples of evidence that are listed in relation to the strategic need standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>
<p>23. What additional standards may be needed to ensure specialised schemes are meeting local and national need? [Free text.]</p>
<p>This covers it</p>
<p>24. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies. Please specify what the information is currently used to evidence. [Free text.]</p>
<p>As above</p>
<p>25. Do you agree with the responsible person standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>
<p>26. Do you agree with the examples of evidence that are listed in relation to the responsible person standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>

<p>27. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies. Please specify what the information is currently used to evidence. [Free text.]</p>
<p>Mandatory, Additional or Selective HMO Licence Electrical Installation Condition Reports Gas Safety Certificate Energy Performance Certificate Water safety management plan Fire Risk Assessment Fire Detection Commissioning / Compliance Certification Emergency Lighting Certification PAT Testing Certificates Fire evacuation plan Flood evacuation plan</p>
<p>28. Do you agree with the statement of purpose support standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>
<p>29. Do you agree with the types of evidence that are listed in relation to the statement of purpose standard? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>No additional comments</p>
<p>30. What other information (if any) could be provided to evidence this standard, including evidence that providers already submit to other bodies. Please specify what the information is currently used to evidence. [Free text.]</p>
<p>As above</p>
<p>31. What criteria should a needs assessment include? [Free text.]</p>
<p>Level of need Risks Support Plan Safeguarding Local connection Aims and objectives</p>
<p>32. Do you agree with the suggested content of support plans? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>

Agree
33. Are there any further criteria that a support plan should include? [Free text.]
Nothing additional
34. What would the risks and benefits be with licensing authorities joining up to administer licensing across local areas authority boundaries? [Free text.]
35. Do you agree with the definition of a scheme? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
36. Do you agree with the proposed licensing exemptions? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Agree
37. Do you agree with the fit and proper person test proposed and who it would apply to? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.]
Strongly agree It should apply to all parties with responsibility for either providing the accommodation (Licence Holder, Manager), mirroring mandatory licensing requirements, and those responsible for managing the support element of the accommodation.
38. Do you agree that supported housing schemes must meet the relevant accommodation requirements and standards to get a supported housing licence? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.]
Strongly agree There should not be a disparity between supported and non-supported accommodation. The standards expected in a premises should not be defined by the cadre of occupant. Parity in national/local licensing schemes should be achieved, as far as is practicable, to make it straightforward for operators and enforcement authorities.
39. you agree that if enforcement action is being taken under the Housing Act 2004 due to the presence of Category 1 health and safety hazards, or there are other issues of concern relating to accommodation quality at the scheme, a licence should not be granted? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not

<p>know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Neither agree nor disagree</p> <p>The presence of a hazard (whether this be Category 1 or 2 hazards, or DHS failures), could arise at any point in a licence's lifetime – this would not necessarily mean that a landlord or provider was not compliant, but how it is then dealt with would need to be considered by the enforcement authority, with revocation / refusal to grant a licence as a punitive measure, alongside tools and powers already provided.</p>
<p>40. Which factors could mean that accommodation is unsuitable to be supported housing for the purposes of this licensing condition? [Free text.]</p>
<p>An outstanding Emergency/Prohibition Order under the Housing Act 2004.</p> <p>An outstanding Prohibition Notice under the Regulatory Reform Order 2005.</p> <p>A premises that does not comply with minimum room sizes / amenity requirements, similar to that expected of other licensed properties.</p>
<p>41. Do you agree that the scheme should demonstrate that it holds the appropriate planning permission to demonstrate compliance with this licensing condition? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.]</p>
<p>Strongly agree</p> <p>There should be scope to facilitate the application or regularisation for premises where planning permission has not already been obtained (in mandatory licensing, this can be achieved by issuing a reduced licence term).</p>
<p>42. Do you agree that each resident must have a needs assessment and support plan? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly Agree</p>
<p>43. Do you agree that a scheme providing care (that meets the definition of regulated personal care) will only be granted a licence if the care service is registered by the Care Quality Commission? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.]</p>
<p>Strongly agree</p>
<p>44. Should the government prevent schemes where the care service has been rated as inadequate by the Care Quality Commission from getting a licence? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree</p>

<p>45. Is the National Supported Housing Standards condition set out above, enforced as part of the licensing regime, likely to be an effective means of securing that the National Supported Housing Standards are met? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree – the onus should be on the licensee to evidence pro-actively</p>
<p>46. Do you agree that the local authorities should have discretion to treat support services commissioned by a public body (such as a local authority, National Health Service or UK government department) as complying with the National Supported Housing Standards? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.]</p>
<p>Partly disagree – unless the service has a specific accommodation inspection regime, with aligned standards to Part 1 of the Housing Act 2004, there is no way to guarantee housing standards, therefore compliance should not be assumed. To ensure fairness across the licensing scheme, all accommodation should be subject to the same checks.</p>
<p>47. What discretionary conditions, if any, should licensing authorities be able to add to a licence application? [Free text.]</p>
<p>Any – provided there is a justified/demonstrable reason, and these conditions are proposed and agreed by the licence applicant in advance of the licence being issued, similar to existing licensing schemes.</p>
<p>48. If you are a supported housing provider, do you already hold another property licence and will you need to hold a supported housing licence in the future? [Yes/No.] If yes, please state which property licence you already hold [Multiple choice HMO/ Selective/ Additional]</p>
<p>N/A</p>
<p>49. Do you agree that where a property licence is already in effect the provider should be treated as licensed for the purposes of supported housing licensing? This would only be for the remaining period of the existing property licence, until it is replaced with a supported housing licence. [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Disagree Holding an existing property licence could be used within a supported housing application to demonstrate previous/current competence, absolutely. However, they should not be relied upon to provide a ‘licensed’ status. We have mandatory HMO licensed property owners who still fall foul of licensing requirements and Management Regulations, who, if this was the case, would be, by default be ‘licensed’ and legitimately responsible for vulnerable residents and the provision of their support.</p>

Premises licensed under HMO licensing schemes will have paid a fee to support that application/service and as such, if a new (suggested 5 year) licence is awarded, a large proportion of properties will then not provide the requisite level of fee to cover the life of the licence issued. It could be possible to deduct any remaining years' licence fee to cover the amount 'lost' by the licensee.

50. In addition to a standardised licence application form that all local authorities would use, what else can the government do to ensure applications are as straightforward as possible for providers and licensing authorities to minimise unnecessary burdens on local authorities and applicants? [Free text.]

A standardised application, with the inclusion of a standard checklist of items which will be expected to be provided for each application, similar to that for HMO licensing.

Integration into LA database systems would be advantageous, but likely out of the reach of Government due to the fact there is no one adopted system used by all authorities.

51. What would the impact of licence fees be on your business, or for administrative purposes if you are a licensing authority? [Free text.]

As a licensing authority, licensing fees must be able to cover the full costs of running the scheme, including issuing/renewing licenses and enforcement and monitoring activity (Part A and Part B) as seen in mandatory licensing.

There is no capacity within existing licensing or housing standards teams to be able to deliver additional schemes within existing budgets.

Schemes must be directly funded by incoming fees. It is not sustainable or good practice to have to rely on funds potentially generated during enforcement activity, as the aim would ultimately be to have a successful licensing scheme that is well managed, with properties that are of a good standard.

52. Do you have any other comments on licensing fees? [Free text.]

As above

53. Do you agree that supported housing licences should be granted for five years, starting from the day the licence is formally issued by the licensing authority? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know]

Strongly agree

This would ensure that licensing schemes achieve parity, which will make it easier for both enforcement authorities and scheme operators to operate within the various schemes that will be in place across the country.

54. Do you agree that local authorities should have the discretion to grant a supported housing licence without carrying out an inspection? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]

Unless for a renewal, all new applications for licenses should be inspected for/at their first application.

At renewal, unless there have been material changes, or changes to the management regime, which could impact the operation of the premises, it would be possible to issue a renewed licence without prior inspection, provided an inspection took place over the lifetime of the licence.

55. Do you agree that licensing authorities should inspect each scheme at least once in a licence period, or more frequently if required? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]

Strongly agree

This would ensure that licensing schemes achieve parity, which will make it easier for both enforcement authorities and scheme operators to operate within the various schemes that will be in place across the country.

56. Do you agree that licensing authorities should agree an improvement plan for a scheme together with the licensee before any further enforcement action is taken? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]

Strongly agree

57. Do you agree that licensing authorities should be able issue improvement notices for a period of three months, except in the case of a serious failure, if the scheme has not improved after an improvement plan has been agreed and undertaken? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]

Strongly agree

58. Do you agree that licensing authorities should have the ability to extend the improvement notice to a maximum of 6 months in exceptional circumstances? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.]

Strongly agree

59. Do you agree with the proposed circumstances in which a licence would need to be varied or revoked? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know]

Strongly agree

60. Do you agree that financial penalties should also be available as an alternative enforcement tool to prosecution and that equivalent provision should be provided for in the licensing regulations? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not

<p>know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree</p> <p>This would ensure that licensing schemes achieve parity, which will make it easier for both enforcement authorities and scheme operators to operate within the various schemes that will be in place across the country.</p>
<p>61. Do you agree that the financial penalties may be determined by the licensing authority, but must not be more than £30,000? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree – with the exception that maximums should be increased in line with other licensing schemes (such as is happening with the Renters Rights Bill).</p> <p>This would ensure that licensing schemes achieve parity, which will make it easier for both enforcement authorities and scheme operators to operate within the various schemes that will be in place across the country.</p>
<p>62. Do you agree that operating as a supported housing scheme without a licence in a licensing area should be an offence? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree</p> <p>This would ensure that licensing schemes achieve parity, which will make it easier for both enforcement authorities and scheme operators to operate within the various schemes that will be in place across the country.</p>
<p>63. Do you agree with the penalties attached to this offence? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree</p>
<p>64. Do you agree that a tenant living in supported housing where a licensing offence has been committed should be able to apply to a tribunal for a determination of rent? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Strongly agree</p> <p>This would provide parity to those in licensed accommodation who are able to be supported to apply for Rent Repayment Orders.</p>
<p>65. Do you agree with the proposed penalty outlined above in respect of non-compliance with licensing conditions? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not</p>

know.] If you would like to explain your answer, please do so here. [Free text.]
Strongly agree
66. Do you agree with the proposed consequence outlined above in respect of non-compliance with an improvement notice? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Strongly agree
67. Should the government include any other consequences of compliance or non-compliance with the regulations or with conditions attached to licences in regulations? [Free text.]
Strongly agree
68. Do you agree that if an offence is committed by a licensee who is a company or organisation and it was committed with the approval or connivance of an officer, or because the officer was negligent, both the officer and the organisation have committed the offence? [Strongly agree/partly agree, neither agree nor disagree/partly disagree/strongly disagree/do not know.]
Strongly agree
69. What other steps can local authorities take to ensure that decisions on compliance with National Supported Housing Standards and licensing applications are delivered consistently across England? [Free text.]
70. What additional ways do you think there may be for securing compliance with the National Supported Housing Standards, in addition to the licensing regime? [Free text.]
71. Do you agree that all providers should be treated as licensed (and still receive Housing Benefit) when the regulations come into force, until a licensing decision has been made? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]
Partly agree There needs to be a period of time to enable enforcement authorities to on-board providers onto the scheme, however it should be over a year to enable the licences to be issued in a staggered fashion, to ensure renewals are not prohibitively intensive after the 5-year cycle. We would suggest all providers should receive their first licence within 12-18 months of the legislation being enacted, with a minimum of a 6-month lead-in period for authorities to create their licensing scheme, staff it, and ensure they are ready to process applications.

72. How can providers be supported to prepare for supported housing licensing? [Free text.]

Strongly agree

This would provide parity to those in licensed accommodation who are able to be supported to apply for Rent Repayment Orders.

73. How can licensing authorities be supported to prepare to run a supported housing licensing scheme? [Free text.]

Clear guidance, resources, additional information on new licensing regime, technical assistance, data analysis tools, stakeholder events and collaborative working with other LAs.

Provide a fixed date for licensing schemes to 'go live' by, to enable adequate preparation.

Provide a fixed term to allow enforcement authorities to on-board initial licences, with these being staged across this term to ensure renewals are not grouped in unsustainable numbers.

Provide new burdens funding in advance of these dates to ensure staff have enough time to be recruited, on-boarded and are ready to licence from the commencement date.

74. Should the government consider introducing a supported housing planning use class and other planning measures to enable more effective regulation? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]

Strongly agree

Providing a specific use class will provide absolute clarity. Premises with existing valid/relevant permission that would be affected by the inception of such a new use class should be able to apply for a change of use free of charge, to ensure they are compliant.

75. What would the effect of a supported housing planning use class, or requiring planning permission for supported housing schemes, be? [Free text.]

There is already a tendency for the use class of properties to be used to a developers' advantage – the use of terms like 'serviced accommodation' and the two use classes (C4 / Sui Generis) to determine small or large HMOs does not align with the enforcement responsibilities of LA housing enforcement teams – to make this licensing scheme and its management as straightforward as possible, allowing only properties with a particular use class to be licensed in this way would be a huge advantage and make evidencing breaches/failures to comply very clear cut.

76. Do you agree with the broad principle of aligning payment of housing benefit or any future housing support to licensing? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]

Agree
<p>77. For England, we are proposing using the definition of personal care as per the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014/2936 to define care in Housing Benefit regulations. Do you agree? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree – For the provider to receive exempt specified rates they must have a valid license.</p>
<p>78. For England, personal care is defined in the Health and Social Care Act 2008 (Regulated Activities) Regulations 2014/2936. Is this definition of personal care sufficient to define the care provided in supported housing (in England) within Housing Benefit regulations? Please provide details to explain your answer. [Free text.]</p>
Agree
<p>79. Do you agree that we should link a definition of care in Housing Benefit regulations to existing legislative definitions of care and frameworks for the regulation of care in Scotland and Wales where possible? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
Agree
<p>80. For Scotland and Wales, will a reference to the respective legislative definition of care be enough to cover all care delivered in supported housing which may be classed as specified accommodation in Housing Benefit regulations? Do you agree? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
N/A
<p>81. What would you define as ‘support’ and ‘supervision’ for the purposes of Housing Benefit? [Free text.]</p>
<p>The provision of assistance or guidance to help a person that is not able to live independently to build on the necessary skills and address any support needs that will assist with reaching independence with minimal level of assistance or none at all.</p>
<p>82. Do you agree that a definition of support in Housing Benefit regulations could include supervision? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
Agree

<p>83. Do you agree that we should also link any definition for support and supervision to the National Supported Housing Standards for England, the Health and Social Care Standards in Scotland and relevant regulations in Wales? [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>
<p>84. What level of care, support or supervision provision do you think is reasonable to be eligible for Housing Benefit under specified accommodation rules? [Free text]</p>
<p>Minimum of 3 hours of support per week.</p>
<p>85. When assessing a Housing Benefit claim under specified accommodation rules, what is reasonable in terms of evidence which a local authority could request when assessing a Housing Benefit claim under any definition or threshold of care, support, or supervision? [Free text].</p>
<p>Evidence of residence, support plan and level of hours of support provided.</p>
<p>86. The government intends to link the eligibility of Housing Benefit in England to licensing so that residents must be living in licensed supported housing to receive Housing Benefit under the specified accommodation rules. [Strongly agree/partly agree/neither agree nor disagree/partly disagree/strongly disagree/do not know.] If you would like to explain your answer, please do so here. [Free text.]</p>
<p>Agree</p>
<p>87. What risks or issues should DWP consider when linking Housing Benefit eligibility in England to licensing? [Free text.]</p>
<p>Some providers may be working with the Council on addressing or validating a license and therefore consideration should be given in consultation with the District Council before a payment is suspended or stopped to avoid unnecessary sanctions.</p>
<p>88. For providers in England, if you had a licence refused and Housing Benefit stopped or was restricted for your residents, what action would you take? Would you consider continuing to operate as general needs accommodation? Would you consider closing? [Free text.]</p>
<p>N/A</p>
<p>89. For residents in England, if you had to move because your provider failed to obtain a licence, what help would you need with finding somewhere else to live and with moving? [Free text.]</p>
<p>N/A</p>
<p>90. For local authorities in England - what support could you offer to residents who may have to move out of their current accommodation if they lose</p>

entitlement to Housing Benefit and access to care, support or supervision because their provider fails to get a licence? [Free text.]
The Council could refer to other support providers that will be willing to accept the applicant. Failing this an assessment under homelessness would have to be considered.
91. For local authorities in England - if a licence is refused for a large scheme, would you be able to identify the Housing Benefit customers within the scheme that were affected by the decision? [Yes/No/Unsure.] Please provide details to explain your answer. [Free text.]
Yes, we should be able to.
92. For stakeholders in Scotland and Wales - What risks do we need to mitigate against, in Scotland and Wales, if we link eligibility in England for Housing Benefit, under specified accommodation rules, to licensing? [Free text]
N/A
93. For stakeholders in Scotland and Wales - As licensing is not being introduced in Scotland and Wales under the Act, would you wish to see entitlement to Housing Benefit under specified accommodation rules linked to the schemes referenced in paragraphs 2.9 and 2.10 or to any other regulatory scheme already in place? [Yes/No.] Please share the appropriate framework or regulatory scheme and give your reasons. [Free Text.]
N/A