

Response ID ANON-TFWH-TZ6U-J

Submitted to Supported Housing (Regulatory Oversight) Act – Consultation
Submitted on 2025-05-14 14:39:07

Basic Information

Ministerial Foreword

Introduction

About you

1 In which capacity are you completing these questions? Please tick all that apply.

Other (please specify in free text below)

If 'Other', specify below.:

This response is from Kent Housing Group, a forum of all the local authorities, many of the housing associations and some supported housing providers in Kent and Medway.

2 Please enter the following information:

Name:

Helen Miller

Email Address:

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Organisation (if applicable):

Kent Housing Group

3 If responding as an individual, where do you live? If you are responding as an organisation, where are you based?

Not Answered

4 Landlord or provider only: How many supported housing units (beds) do you own or manage?

Not Answered

Part 1 - Chapter 1 – Scope

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.

Partly agree

If you do not fully agree please explain why here.:

How can Local Authorities Licence their own premises? E.g. refuges, homeless hostels.

Part 1 - Chapter 2 - National Supported Housing Standards and Principles

6 Do the principles reflect the core elements of a good quality support service?

Partly disagree

If you would like to explain your answer, please do so here.:

The way the question's worded is not wholly appropriate.

7 Do you have suggestions for any additions to the principles as described above?

Please enter your answer here.:

Align with the previous Supported Housing Quality Assessment Framework.

Needs to have additional information on staff training and equality issues.

Many in this group are private sector housing officers based in local housing authorities and have no/limited knowledge on care/support.

Part 1 - Chapter 2 - Evidencing and Assessing the Standards

Part 1 - Chapter 2 - The person-centred support standard

8 Do you agree with the person-centred support standard?

Partly agree

If you would like to explain your answer, please do so here.:

Fairly standard expectations for this type of support.

9 Do you agree with the examples of evidence that are listed?

Partly agree

If you would like to explain your answer, please do so here.:

We'd expect feedback from Residents to be included in this.

We have Data Protection concerns about sharing support plans as very personal information is included in these plans. Need to be measured and provide relevant information to the recipient.

Need to evidence that support plan matches the needs assessments.

Some Clients have capacity issues.

Claimant provides their own evidence with Housing Benefit.

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.

Please enter your answer here.:

Audit from other bodies is evidence for plan to be evidenced/approved e.g. CQC, Commissioners notes.

Outcomes evidence.

Part 1 - Chapter 2 - The empowerment standard

11 Do you agree with the empowerment support standard?

Partly agree

If you would like to explain your answer, please do so here.:

Should be advocacy standards and opportunities.

More about equality needed.

Feedback from family/representatives also relevant, particularly if client lacks capacity.

Tenant satisfaction measures.

12 Do you agree that providers should give residents an information pack when they move into their accommodation?

Strongly agree

If you would like to explain your answer, please do so here.:

Should be adapted to needs of the client e.g. language, pictorial, accessible formats, etc.

13 Do you agree with the examples of evidence that are listed?

Partly agree

If you would like to explain your answer, please do so here.:

Partly agree if include to answers to Q11:

Should be advocacy standards and opportunities.

More about equality needed.

Feedback from family/representatives also relevant, particularly if client lacks capacity.

Tenant satisfaction measures.

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.

Please enter your answer here.:

Accreditation by Third parties

See previous answers in Q11:

Should be advocacy standards and opportunities.

More about equality needed.

Feedback from family/representatives also relevant, particularly if client lacks capacity.

Tenant satisfaction measures.

Part 1 - Chapter 2 - The environment standard

15 Do you agree with the environment support standard?

Partly agree

If you would like to explain your answer, please do so here.:

16 Do you agree with the examples of evidence that are listed in relation to the environment standard?

Partly agree

If you would like to explain your answer, please do so here.:

There should be a Housing Act 2004 HHSRS inspection at this point.

Energy Performance Certificate.

Legionnaires Risk Assessment.

Decent Homes Standard inspection.

Asbestos Surveys.

Planning consent where required.

Building Control Notification.

Insurance documents e.g. insurance liabilities, landlord insurance.

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.

Please enter your answer here.:

See answer to Q 16:

There should be a Housing Act 2004 HHSRS inspection at this point.

Energy Performance Certificate.

Legionnaires Risk Assessment.

Decent Homes Standard inspection.

Asbestos Surveys.

Planning consent where required.

Building Control Notification.

Insurance documents e.g. insurance liabilities, landlord insurance.

Part 1 - Chapter 2 - The staff and safeguarding standard

18 Do you agree with the staff and safeguarding support standard?

Partly agree

If you would like to explain your answer, please do so here :

19 Do you agree with the examples of evidence that are listed in relation to the safeguarding standard?

Partly agree

If you would like to explain your answer, please do so here.:

Interviews with staff to verify that policies are understood and followed.

Evidence of performance management and governance.

Safer recruitment policies.

Complaint handling policies.

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.

Please enter your answer here.:

See previous answers:

Interviews with staff to verify that policies are understood and followed.

Evidence of performance management and governance.

Safer recruitment policies.

Complaint handling policies.

Additionally:

Inspectors wouldn't want to see the DBSs, just confirmation that all staff are checked and cleared.

Declarations of compliance will be needed as burden of proof/amount of information involved is very high.

Part 1 - Chapter 2 - The local need standard

21 Do you agree with the local need support standard?

Do not know

If you would like to explain your answer, please do so here.:

Currently don't know what the local needs support strategy will include so very difficult to make any comments.

22 Do you agree with the examples of evidence that are listed in relation to the strategic need standard?

Do not know

If you would like to explain your answer, please do so here.:

Currently don't know what the local needs support strategy will include so very difficult to make any comments.

23 What additional standards may be needed to ensure specialised schemes are meeting local and national need?

Please enter your answer here.:

The schemes should reflect the Local Plan and may need planning consent.

Local government re-organisation may also have a bearing on this.

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.

Please enter your answer here.:

Commissioning strategies agreed by the commissioning authorities (which may be different organisations from those doing the licensing).

Local Authorities (Unitary) also have a responsibility to issue commissioning strategies.

Local Housing Authorities are not currently involved in this.

There is a dis-connect at the moment between responsibilities between the different levels of authorities e.g. county, unitary and districts.

Following any re-organisations to larger unitary governance, there will be issues with conflict of interest.

Needs Data required.

Part 1 - Chapter 2 - The responsible person standard

25 Do you agree with the responsible person standard?

Strongly agree

If you would like to explain your answer, please do so here.:

CQC already do this and common in Licensing in Housing remit.

26 Do you agree with the examples of evidence that are listed in relation to the responsible person standard?

Partly agree

If you would like to explain your answer, please do so here.:

CQC Certification already available as evidence.

Should the Responsible Person be the safeguard lead? How does that work if they are the one posing a risk to clients?

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.

Please enter your answer here.:

No response.

Part 1 - Chapter 2 - The statement of purpose standard

28 Do you agree with the statement of purpose support standard?

Partly agree

If you would like to explain your answer, please do so here.:

29 Do you agree with the types of evidence that are listed in relation to the statement of purpose standard?

Partly agree

If you would like to explain your answer, please do so here.:

But some of the evidence suggested could put clients at risk; it's too sensitive to publish. Evidence better to be provided to those that need to see it only e.g. Licence provider.

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.

Please enter your answer here.:

No Response.

Part 1 - Chapter 2 - Needs Assessments and Support Plans

31 What criteria should a needs assessment include?

Please enter your answer here.:

Person Centred.

Outcome based.

Needs assessment should include why that client needs this type of housing and why that particular type of supported housing is required; helpful to Housing Benefit assessment.

Date carried out and review date both should be covered.

Needs of the persons should be matched to the appropriate type of Supported Housing.

32 Do you agree with the suggested content of support plans?

Partly agree

If you would like to explain your answer, please do so here.:

Identify the individual's need.

Support identified needs to be linked to the assessment.

Proposed outcomes and interventions need to reflect the needs of the individual.

Regular reviews required as needs change.

33 Are there any further criteria that a support plan should include?

Please enter your answer here.:

No Response.

Part 1 - Chapter 3 - The Supported Housing Licensing Regime

34 What would the risks and benefits be with licensing authorities joining up to administer licensing across local areas authority boundaries?

Please enter your answer here.:

How does this fit in with local authorities Local Plan and standards?

One size fits all won't necessarily work across many districts.

With Local Government re-organisation this could be advantageous as one area could deal with other area within the one unitary authority.

Could lead to difficulties with different levels of Housing Benefit and service charges applicable across different districts.

Licensing is per property, even in the same licensing scheme this could have different Housing Benefit levels across boundaries.

This will come in before local government re-organisation; risks to those not currently unitary authorities could commission something that the district isn't comfortable with as far as licensing is concerned.

Local Housing Authorities expertise is with property standards not support and care, so re-organisation could allow bigger authority to have a specialised Officer working on care/support side across the merged authorities.

Multi-disciplinary approach needed; Local Housing Authority cannot assess needs/support/care; need help from experts in this field.

Part 1 - Chapter 3 - Which types of supported housing will need a licence?

35 Do you agree with the definition of a scheme?

Neither agree nor disagree

If you would like to explain your answer, please do so here.:

This scheme definition would mean one bed units would be defined as a scheme so a high burden on providers. It may be better to consider a service, based on factors including geography, similar service deliver, similar client group, using same staff and management, etc.

Funding is an issue; changes to personnel would be required. Providers would have to pass costs on through Housing Benefit bills.

Part 1 - Chapter 3 - Who will need to apply for a licence?

36 Do you agree with the proposed licensing exemptions?

Partly disagree

If you would like to explain your answer, please do so here.:

Need clarification on: b. OFSTED regulated supported housing.

Neither the CAS2 accommodation schemes, MOJ or OFSTED regulated supported housing are inspected for building safety etc, so same rules should apply to all schemes. No exemptions should be given.

Part 1 - Chapter 3 - The fit and proper person test

37 Do you agree with the fit and proper person test proposed and who it would apply to?

Partly agree

If you would like to explain your answer, please do so here.:

Part 1 - Chapter 3 - Licensing conditions

Part 1 - Chapter 3 - Proposed conditions relating to the standard of accommodation

38 Do you agree that supported housing schemes must meet the relevant accommodation requirements and standards to get a supported housing licence?

Partly agree

39 Do 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?

Partly disagree

If you would like to explain your answer, please do so here.:

What would happen to the vulnerable residents if the licence were not granted?

Local Housing Authorities would not have the expertise to assess for specific disabilities.

Part 1 - Chapter 3 - Proposed conditions relating to the use of accommodation

40 Which factors could mean that accommodation is unsuitable to be supported housing for the purposes of this licensing condition?

Please enter your answer here.:

No response.

(For Q41 below - we strongly agree and have an additional comment: Planning permission needs to be agreed before licence given if planning permission is needed.)

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

Part 1 - Chapter 3 - Proposed conditions for needs assessments for support

42 Do you agree that each resident must have a needs assessment and support plan?

Strongly agree

If you would like to explain your answer, please do so here.:

Domestic Abuse Refuges are not required to provide support under Housing Benefit regulations.

Part 1 - Chapter 3 - Proposed conditions relating to the provision of care, support, and supervision

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?

Do not know

44 Should the government prevent schemes where the care service has been rated as inadequate by the Care Quality Commission from getting a licence?

Do not know

If you would like to explain your answer, please do so here.:

What happens to the property if no licence granted?

Challenges to CQC (which is under-resourced) with providers justifying why the CQC finding is incorrect.

Additional licence condition could be that providers should rectify issues within a certain timescale.

Part 1 - Chapter 3 - Proposed conditions relating to compliance with the National Supported Housing Standards

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?

Do not know

If you would like to explain your answer, please do so here.:

Do not have knowledge of the National Supported Housing Standards.

Part 1 - Chapter 3 - Local authority discretion and the National Supported Housing Standards

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?

Do not know

Part 1 - Chapter 3 - Local authority discretionary licensing conditions

47 What discretionary conditions, if any, should licensing authorities be able to add to a licence application?

Please enter your answer here.:

Should include Anti Social Behaviour and nuisance to neighbours.

Individual conditions for individual schemes.

Deal with Category 1 Rating System hazards as conditions.

CQC findings of inadequacies should incur a time period for provider to rectify the issues.

Suitability of accommodation, properties lacking facilities, inadequate room sizes – there should be a condition that when the current resident moves on from such rooms, they should no longer be used.

Part 1 - Chapter 3 - Existing property licences

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(s) you already hold.

No

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 disagree

If you would like to explain your answer, please do so here.:

HMO licensing is only for condition and suitability not regarding vulnerable people – they could be inadequate in provision of care standards. There should be a short transition period to comply with the new supported housing licensing – not five years; suggest a year maximum to allow for setting up administrative processes and staff resources.

Part 1 - Chapter 3 - Applying for a licence

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?

Please enter your answer here.:

No Response.

Part 1 - Chapter 3 - Licence fees

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

Please enter your answer here.:

Where will the budget for the licensing come from?

This will impact resources – e.g. the administrative tasks required.

Local authorities set fee according to the cost of processing licences – this will be high in this process.

Buying in services to help with care assessment will add to the cost.

52 Do you have any other comments on licensing fees?

Please enter your answer here.:

No response.

Part 1 - Chapter 3 - How long will a license last?

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?

Partly agree

Part 1 - Chapter 3 - Inspections and licensing authority discretion

54 Do you agree that local authorities should have the discretion to grant a supported housing licence without carrying out an inspection?

Partly agree

If you would like to explain your answer, please do so here :

Without inspections properties could fall through the gaps.

Inspecting allows recognition of the issues but cannot amend the licensing afterwards. In this case there would not be enforcement powers to amend the licensing.

Do not support licensing without inspections.

Could have flexible approach e.g. in Lack of resources could prevent property inspections, or the presence of particular health conditions of residents, such as residents with TB could delay access.

No rush to issue a licence

Housing Benefit LA error – could get less subsidy; if licences take longer this would have a negative impact.

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

If you would like to explain your answer, please do so here.:

Part 1 - Chapter 3 - Maintaining licences wherever possible and using improvement notices

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?

Partly agree

If you would like to explain your answer, please do so here.:

Might contradict duties under Housing Act.

Mitigate risk of service shut down and so making vulnerable people homeless.

Makes it easier for LA to take a case to tribunal and makes it easier for a provider to have more time to put works right.

Is this about additional conditions to the licence rather than an improvement plan?

Why is this not an improvement notice with a timescale for improvements, rather than an improvement plan? This adds another level of processes. No need for an improvement plan in addition to an improvement notice.

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?

Partly agree

If you would like to explain your answer, please do so here.:

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?

Neither agree nor disagree

Part 1 - Chapter 3 - Varying or revoking licences

59 Do you agree with the proposed circumstances in which a licence would need to be varied or revoked?

Partly agree

Part 1 - Chapter 3 - Enforcing licensing conditions

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?

Partly agree

If you would like to explain your answer, please do so here.:

61 Do you agree that the financial penalties may be determined by the licensing authority, but must not be more than £30,000?

Partly agree

If you would like to explain your answer, please do so here.:

62 Do you agree that operating as a supported housing scheme without a licence in a licensing area should be an offence?

Partly agree

If you would like to explain your answer, please do so here.:

This doesn't fit well with the suggestion that all properties would be treated as licensed for housing benefit purposes until a decision is made. It's a conflicting approach and opposite to what is suggested in Question 71. There should be a grace period or at least an opportunity for the housing scheme to submit a licence application.

63 Do you agree with the penalties attached to this offence?

Partly agree

If you would like to explain your answer, please do so here.:

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?

Partly agree

If you would like to explain your answer, please do so here.:

Providing the Local Housing Authority is not expected to support with the application for rent repayment, as this would be too resource intensive. At present, if housing benefits are claimed, the rent or a large proportion of it would have to be repaid to benefits department.

Part 1 - Chapter 3 - Non-compliance with licensing conditions and improvement notices

65 Do you agree with the proposed enforcement action outlined above in respect of non-compliance with licensing conditions?

Partly agree

If you would like to explain your answer, please do so here.:

There should be a civil penalty and revocation option.

66 Do you agree with the proposed consequence outlined above in respect of non-compliance with an improvement notice?

Neither agree nor disagree

If you would like to explain your answer, please do so here.:

67 Should the government include any other consequences of compliance or non-compliance with the regulations or with conditions attached to licences in regulations?

Please enter your answer here.:

No Response.

Part 1 - Chapter 3 - Offences committed by companies or organisations

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?

Do not know

Part 1 - Chapter 3 - Appeals against licensing decisions

Part 1 - Chapter 3 - Ensuring consistency across licensing districts

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?

Please enter your answer here.:

No Response.

Part 1 - Chapter 3 - Alternative ways to ensure compliance with National Supported Housing Standards

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?

Please enter your answer here.:

Expecting Local Housing Authorities, with no care/support experience, to be licensing properties of this type is disproportionate to the remit of Local Housing Authorities (specifically Private Sector Housing services). This role would sit better with another body such as CQC (with the right investment in their resources) and Local Housing Authorities acting as consultees to provide housing condition reports. Local Housing Authorities will have to buy in expertise in order to run a licensing scheme such as this. When we become unitary authorities in a few years' time, how can they licence properties that they in effect manage or own? It would be outside of their remit to do this. Who then takes on the licensing? This is another good reason for a separate (Non-LA) body to operate this licensing regime.

Part 1 - Chapter 3 - The transition to supported housing licensing

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?

Partly disagree

If you would like to explain your answer, please do so here.:

72 How can providers be supported to prepare for supported housing licensing?

Please enter your answer here.:

No Response.

73 How can licensing authorities be supported to prepare to run a supported housing licensing scheme?

Please enter your answer here.:

No Response.

Part 1 - Chapter 3 - Case Studies

Part 1 - Chapter 4 - Planning use class for supported housing

74 Should the government consider introducing a supported housing planning use class and other planning measures to enable more effective regulation?

Do not know

If you would like to explain your answer, please do so here.:

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

Please enter your answer here.:

No Response.

Part 2 - Housing Benefit Changes (applies to Great Britain (GB))

76 Do you agree with the broad principle of aligning payment of housing benefit or any future housing support to licensing?

Partly agree

If you would like to explain your answer, please do so here.:

Part 2 - Chapter 1 - Defining care, support, and supervision for the purposes of specified accommodation in Housing Benefit regulations across Great Britain.

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?

Not Answered

If you would like to explain your answer, please do so here.:

No Response.

Part 2 - Chapter 1 - Defining care (1)

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.:

No Response.

Part 2 - Chapter 1 - Defining care (2)

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?

Not Answered

If you would like to explain your answer, please do so here.:

No Response.

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?

Not Answered

If you would like to explain your answer, please do so here.:

Part 2 - Chapter 1 - Defining Support and Supervision (1)

81 What would you define as 'support' and 'supervision' for the purposes of Housing Benefit?

Please enter your answer here.:

No Response.

Part 2 - Chapter 1 - Defining Support and Supervision (2)

82 Do you agree that a definition of support in Housing Benefit regulations could include supervision?

Not Answered

If you would like to explain your answer, please do so here.:

No Response.

Part 2 - Chapter 1 - Defining Support and Supervision (3)

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?

Not Answered

If you would like to explain your answer, please do so here.:

No Response.

Part 2 - Chapter 1 - Defining Support and Supervision (4)

84 What level of care, support or supervision provision do you think is reasonable to be eligible for Housing Benefit under specified accommodation rules?

Please enter your answer here.:

No Response.

Part 2 - Chapter 1 - Defining Support and Supervision (5)

85 When assessing a Housing Benefit claim under specified accommodation rules, what is a 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?

Please enter your answer here.:

No Response.

Part 2 - Chapter 2 – Linking Housing Benefit eligibility to licensed provision in England and exploring opportunities to link to other frameworks in Scotland and Wales.

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. Do you:

Not Answered

If you would like to explain your answer, please do so here.:

No Response.

87 What risks or issues should DWP consider when linking Housing Benefit eligibility in England to licensing?

Please enter your answer here.:

No Response.

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?

Please enter your answer here.:

No Response.

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?

Please enter your answer here.:

No Response.

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 entitlement to Housing Benefit and access to care, support or supervision because their provider fails to get a licence?

Please enter your answer here.:

No Response.

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

Please provide details to explain your answer.:

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?

Please enter your answer here.:

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?

Not Answered

Please share the appropriate framework or regulatory scheme and give your reasons. :

Annexe - Privacy Policy