

**TO: The Rt Hon Michael Gove MP
Secretary of State for Levelling Up, Housing and Communities,
House of Commons,
London,
SW1A 0AA**

17/02/22

Dear Secretary of State,

Re: Urgent reform in the exempt accommodation sector

We are writing to you on behalf of 41 organisations and individuals across the housing sector and those that work with, or represent, people currently living in the non-commissioned supported housing sector, otherwise known as exempt accommodation. Together, we encourage the government to tackle the cases of exploitation of the exempt system and work towards the provision of secure, appropriate, and good quality support for vulnerable adults and young people.

As you will be aware, there has been significant concern over the growth in the underregulated exempt accommodation sub-sector. In this type of housing, landlords that provide “more than minimal care, support or supervision” get significantly higher levels of rent covered by Housing Benefit than under the normal rules. The city of Birmingham has seen the number of claimants double in the three years since Commonweal Housing commissioned its groundbreaking report [Exempt From Responsibility?](#) with Spring Housing Association and the University of Birmingham.

While many housing providers in the space are operating appropriate services and providing secure housing, unfortunately there are some organisations failing to deliver the necessary quality in provision or services to protect vulnerable people. These include among others: domestic abuse survivors, those recovering from alcohol and drug addiction, rough sleepers, care leavers, and asylum seekers and refugees. Many of these people are living in cramped and often dangerous housing without the necessary support that should be expected, and often to which they were promised. This is further marred by a lack of transparency and regulation which has enabled some exploitative providers to profiteer.

We are concerned by the growing number of poor providers emerging across the country and the number of vulnerable people from diverse groups and backgrounds whose health and wellbeing is compromised. This is in addition to the increasing number of providers deemed non-compliant by the [Regulator for Social Housing](#); the impact that an unplanned collapse of one or more of these organisations would be tangible to the lives of potentially thousands of people, with no clear reactive rehousing strategy in place. The planned closure of Prospect Housing, a large provider in Birmingham, has already highlighted the significant pressure this places on the local authority and other housing and support services.

We are pleased to note that the Levelling Up, Housing and Communities Committee has launched an inquiry into exempt accommodation and we look forward to the Committee's findings. This is an important next step following the Government's initial introductions of five local authority pilot projects in 2020. But despite the positive learnings we have seen, the findings of the pilots are not yet published, and the pace of decision-making has been slower than we would hope, we are therefore growing increasingly concerned by the

potential ramifications that inaction will have on already vulnerable, precariously housed individuals. The ongoing rise and spread in the number of exempt accommodation schemes across the country has been described as a "[gold rush](#)", as providers and agents seek to capitalise on the loopholes whilst they can.

We recommend the Government commit to developing a strategy for how it intends to make sure vulnerable people receive quality services and do not have to live in substandard accommodation. This should include:

- Measures to ensure that care, support and supervision meets the necessary and expected quality, and that Government provides local authorities with sustained funding to support services that meet local needs, ending the injustice of exempt claimants having to pay for the costs of support services that are ineligible for Housing Benefit;
- The closure of loopholes that grant the opportunity to exploit the system;
- Further strengthening the powers of the Regulator of Social Housing to proactively act in this area where Registered Providers are involved;
- Support, enable and fund councils to review their local situation, including where necessary, empowering councils to assess the need for housing-related support and carry out the development of an Exempt Accommodation Strategy so that local authorities can be actively engaged in oversight of this sector.

We see this as an urgent issue for both the Department for Levelling Up, Housing and Communities (DLUHC), and the Department for Work and Pensions (DWP), and a copy of this letter has been sent to the Secretary of State for Work and Pensions. We'd be happy to work collaboratively with both Departments, building on positive work from the Government to date, to ensure a safe and sustainable future for the sector and its users.

Yours sincerely,



Ashley Horsey
Chief Executive
ashleyh@commonweal.org.uk



Cllr James Jamieson
Chairman of the Association
Local Government
Association
James.jamieson@local.gov.uk

And we the undersigned:

National Housing Federation		National Housing Federation
Matt Downie	Chief Executive	Crisis
Dominic Bradley	Group Chief Executive	Spring Housing
Steve Douglas	Chief Executive	St Mungo's
Balbir Chatrik	Director of Policy and Communications	Centrepont
Gavin Smart	Chief Executive	Chartered Institute for Housing
Jean Templeton	Chief Executive	St Basils
Bridget Young	Director	NACCOM
Farah Nazeer	Chief Executive	Women's Aid
Kathy Mohan	Chief Executive	Housing Justice
Tom Copley	Deputy Mayor of London for Housing and Residential Development	Greater London Authority
Thea Raisbeck	Honorary Research Fellow	University of Birmingham
Cllr Sharon Thompson	Chair, WMCA Homelessness Taskforce Members Advisory Group, West Midlands Region	Birmingham City Council
Cllr Ian Ward	Leader of the Council	Birmingham City Council
Cllr Shabrana Hussain	Cabinet Member for Homes and Neighbourhoods	Birmingham City Council
Cllr Daren Hale	Leader of the Council	Hull City Council
Cllr Asher Craig	Deputy Mayor	Bristol City Council

Cllr Mohammed Khan CBE	Leader of the Council	Blackburn with Darwen Borough Council
Simon Foster	West Midlands Police and Crime Commissioner	West Midlands Police
Tom McNeil	Assistant Police and Crime Commissioner	West Midlands Police
Joanne Anderson	Mayor of Liverpool	Liverpool City Council
Cllr Lynn Williams	Leader of the Council	Blackpool Council
Cllr Terry Fox	Leader of the Council	Leader of Sheffield City Council
Cllr Bev Craig	Leader of the Council	Manchester City Council
Cllr Nick Forbes	Leader of the Council	Newcastle City Council
Alexia Murphy	Executive Director	Depaul
David Ford	Founder and CEO	Expert Link
Moya Woolven	CEO	Basis Yorkshire
Stephen Bell OBE	Chief Executive	Changing Lives
Jeremy Gray	Chief Executive	Evolve Housing + Support
Denise McDowell	Chief Executive	Greater Manchester Immigration Aid Unit
Helen Syrop	Manager	Hope Housing
Michael Patterson	Author	Supported Housing Blog
Salma Ravat	Manager	One Roof Leicester
Dr Chris Wooff	Joint Leader	ACAP (Ashton Churches Asylum Project)
Gudrun Burnet	CEO	Standing Together
Jane Williams	CEO and Founder	The Magpie Project

Mick Clarke	Chief Executive	The Passage
Richard James	Chief Executive	YMCA St Paul's
Liz Zacharias	Director	Campbell Tickell
David Ireland	Chief Executive	World Habitat
Richard Davies	Chair of Trustees	Wakefield District City of Sanctuary
Cllr Robert Alden	Leader of the Opposition	Birmingham City Council
Cllr Gareth Moore	Councillor for Erdington & Lead Opposition Member for Planning	Birmingham City Council
Jane Brannan	Group Leader Housing	Barnsley Metropolitan Borough Council
Paul Powell	Director	Succour Haven CIC
Daniel Evans	National Housing Manager	Adullam Homes Housing Association Ltd.
Guy Bosanko	Executive Chair	IHL Group
David Fawcett	Chief Executive Officer	Happydays UK
Ros Holland	Chief Executive	Boaz Trust
Rebecca Brearley	Housing Officer	St. Augustine's Centre
Andy Redfearb	Director	LivShare Housing and Consultancy
Anne Asquith	Senior Commissioning Manager	Barnsley Council
Rebekah Douglas	Social Impact Manager	Wiggett Group LTD
Neil Parkinson	Co-head of Casework	Glass Door Homeless Charity
Nicola Gates	Co Founder	Suffolk Survivor Network
Sara Robinson	Centre Director	St Augustine's Centre
Liz Rutherford	CEO	Single Homeless Project
Paul Hunt	CEO	IMPAKT housing & support
Kim Larkin	Managing Director	LA Directories Ltd

Paul E. Gartland	CEO	Horton Housing Association
Lisa Thompson	CEO	RSVP (Rape & Sexual Violence Project)
Amrick Singh Ubhi	Director of Civic Engagement and Partnerships	Nishkam Civic Association
Beth Ash	Co-ordinator	The Night Shelter
Ed Hodson	Research & Campaigns Co-ordinator	Coventry Citizens Advice
Jim Nicholl	Acting Chair	Quinton Housing Liaison Board (Birmingham)
Moz Stewart	Co-developer	The UK Right 2 Rent Register
Vicks Johnson	Associate Director	Devon Clinical Commissioning Group
Matthieu Lambert	Chief Executive	Enterprise Homes Group
David Mullins	Emeritus Professor of Housing	University of Birmingham
Gavin Mullaley	Director	Cornerstone Partnership
Chris Smith	Founder and Managing Director	Centre for the New Midlands
Halima Sacranie	Research Lead, Housing and Communities Research Group, University of Birmingham; Housing and Communities Advisory Board Chair, Centre for the New Midlands	University of Birmingham, and Centre for the New Midlands
Carly Jones	Chief Executive	SIFA Fireside
Jackie Kings	Strategic Manager	Plymouth City Council
Rick Henderson	CEO	Homeless Link

TO: The Rt Hon Dr Thérèse Coffey MP
Secretary of State for Work and Pensions
Caxton House
Tothill Street
London
SW1H 9NA

17/02/22

Dear Secretary of State,

Re: Urgent reform in the exempt accommodation sector

We are writing to you on behalf of 42 organisations and individuals across the housing sector and those that work with, or represent, people currently living in the non-commissioned supported housing sector, otherwise known as exempt accommodation. Together, we encourage the government to tackle the cases of exploitation of the exempt system and work towards the provision of secure, appropriate, and good quality support for vulnerable adults and young people.

As you will be aware, there has been significant concern over the growth in the underregulated exempt accommodation sub-sector. In this type of housing, landlords that provide “more than minimal care, support or supervision” get significantly higher levels of rent covered by Housing Benefit than under the normal rules. The city of Birmingham has seen the number of claimants double in the three years since Commonweal Housing commissioned its groundbreaking report [Exempt From Responsibility?](#) with Spring Housing Association and the University of Birmingham.

While many housing providers in the space are operating appropriate services and providing secure housing, unfortunately there are some organisations failing to deliver the necessary quality in provision or services to protect vulnerable people. These include among others: domestic abuse survivors, those recovering from alcohol and drug addiction, rough sleepers, care leavers, and asylum seekers and refugees. Many of these people are living in cramped and often dangerous housing without the necessary support that should be expected, and often to which they were promised. This is further marred by a lack of transparency and regulation which has enabled some exploitative providers to profiteer.

We are concerned by the growing number of poor providers emerging across the country and the number of vulnerable people from diverse groups and backgrounds whose health and wellbeing is compromised. This is in addition to the increasing number of providers deemed non-compliant by the [Regulator for Social Housing](#); the impact that an unplanned collapse of one or more of these organisations would be tangible to the lives of potentially thousands of people, with no clear reactive rehousing strategy in place. The planned closure of Prospect Housing, a large provider in Birmingham, has already highlighted the significant pressure this places on the local authority and other housing and support services.

We are pleased to note that the Levelling Up, Housing and Communities Committee has launched an inquiry into exempt accommodation and we look forward to the Committee's findings. This is an important next step following the Government's initial introductions of five local authority pilot projects in 2020. But despite the positive learnings we have seen, the findings of the pilots are not yet published, and the pace of decision-making has been

slower than we would hope, we are therefore growing increasingly concerned by the potential ramifications that inaction will have on already vulnerable, precariously housed individuals. The ongoing rise and spread in the number of exempt accommodation schemes across the country has been described as a ["gold rush"](#), as providers and agents seek to capitalise on the loopholes whilst they can.

We recommend the Government commit to developing a strategy for how it intends to make sure vulnerable people receive quality services and do not have to live in substandard accommodation. This should include:

- Measures to ensure that care, support and supervision meets the necessary and expected quality, and that Government provides local authorities with sustained funding to support services that meet local needs, ending the injustice of exempt claimants having to pay for the costs of support services that are ineligible for Housing Benefit;
- The closure of loopholes that grant the opportunity to exploit the system;
- Further strengthening the powers of the Regulator of Social Housing to proactively act in this area where Registered Providers are involved;
- Support, enable and fund councils to review their local situation, including where necessary, empowering councils to assess the need for housing-related support and carry out the development of an Exempt Accommodation Strategy so that local authorities can be actively engaged in oversight of this sector.

We see this as an urgent issue for both the Department for Work and Pensions (DWP), and the Department for Levelling Up, Housing and Communities (DLUHC), and a copy of this letter has been sent to the Secretary of State for Levelling Up, Housing and Communities. We'd be happy to work collaboratively with both Departments, building on positive work from the Government to date, to ensure a safe and sustainable future for the sector and its users.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Ashley Horsey'.

Ashley Horsey
Chief Executive
Commonweal Housing

A handwritten signature in black ink, appearing to read 'James Jamieson'.

Cllr James Jamieson
Chairman of the Association
Local Government
Association

And we the undersigned:

National Housing Federation		National Housing Federation
Matt Downie	Chief Executive	Crisis
Dominic Bradley	Group Chief Executive	Spring Housing
Steve Douglas	Chief Executive	St Mungo's
Balbir Chatrik	Director of Policy and Communications	Centrepont
Gavin Smart	Chief Executive	Chartered Institute for Housing
Jean Templeton	Chief Executive	St Basils
Bridget Young	Director	NACCOM
Farah Nazeer	Chief Executive	Women's Aid
Kathy Mohan	Chief Executive	Housing Justice
Tom Copley	Deputy Mayor of London for Housing and Residential Development	Greater London Authority
Thea Raisbeck	Honorary Research Fellow	University of Birmingham
Cllr Sharon Thompson	Chair, WMCA Homelessness Taskforce Members Advisory Group, West Midlands Region	Birmingham City Council
Cllr Ian Ward	Leader of the Council	Birmingham City Council
Cllr Shabrana Hussain	Cabinet Member for Homes and Neighbourhoods	Birmingham City Council
Cllr Daren Hale	Leader of the Council	Hull City Council
Cllr Asher Craig	Deputy Mayor	Bristol City Council



CLlr Mohammed Khan
CBE

Leader of the Council

Blackburn with Darwen
Borough Council



Simon Foster

West Midlands Police and
Crime Commissioner

West Midlands Police

Tom McNeil

Assistant Police and
Crime Commissioner

West Midlands Police

Joanne Anderson

Mayor of Liverpool

Liverpool City Council

CLlr Lynn Williams

Leader of the Council

Blackpool Council

CLlr Terry Fox

Leader of the Council

Leader of Sheffield City
Council

CLlr Bev Craig

Leader of the Council

Manchester City Council

CLlr Nick Forbes

Leader of the Council

Newcastle City Council

Alexia Murphy

Executive Director

Depaul

David Ford

Founder and CEO

Expert Link

Moya Woolven

CEO

Basis Yorkshire

Stephen Bell OBE

Chief Executive

Changing Lives

Jeremy Gray

Chief Executive

Evolve Housing +
Support

Denise McDowell

Chief Executive

Greater Manchester
Immigration Aid Unit

Helen Syrop

Manager

Hope Housing

Michael Patterson

Author

Supported Housing Blog

Salma Ravat

Manager

One Roof Leicester

Dr Chris Wooff

Joint Leader

ACAP (Ashton Churches
Asylum Project)

Gudrun Burnet

CEO

Standing Together

Jane Williams

CEO and Founder

The Magpie Project

Mick Clarke	Chief Executive	The Passage
Richard James	Chief Executive	YMCA St Paul's
Liz Zacharias	Director	Campbell Tickell
David Ireland	Chief Executive	World Habitat
Richard Davies	Chair of Trustees	Wakefield District City of Sanctuary
Cllr Robert Alden	Leader of the Opposition	Birmingham City Council
Cllr Gareth Moore	Councillor for Erdington & Lead Opposition Member for Planning	Birmingham City Council
Jane Brannan	Group Leader Housing	Barnsley Metropolitan Borough Council
Paul Powell	Director	Succour Haven CIC
Daniel Evans	National Housing Manager	Adullam Homes Housing Association Ltd.
Guy Bosanko	Executive Chair	IHL Group
David Fawcett	Chief Executive Officer	Happydays UK
Ros Holland	Chief Executive	Boaz Trust
Rebecca Brearley	Housing Officer	St. Augustine's Centre
Andy Redfearb	Director	LivShare Housing and Consultancy
Anne Asquith	Senior Commissioning Manager	Barnsley Council
Rebekah Douglas	Social Impact Manager	Wiggett Group LTD
Neil Parkinson	Co-head of Casework	Glass Door Homeless Charity
Nicola Gates	Co Founder	Suffolk Survivor Network
Sara Robinson	Centre Director	St Augustine's Centre
Liz Rutherford	CEO	Single Homeless Project
Paul Hunt	CEO	IMPAKT housing & support
Kim Larkin	Managing Director	LA Directories Ltd



Paul E. Gartland	CEO	Horton Housing Association
Lisa Thompson	CEO	RSVP (Rape & Sexual Violence Project)
Amrick Singh Ubhi	Director of Civic Engagement and Partnerships	Nishkam Civic Association
Beth Ash	Co-ordinator	The Night Shelter
Ed Hodson	Research & Campaigns Co-ordinator	Coventry Citizens Advice
Jim Nicholl	Acting Chair	Quinton Housing Liaison Board (Birmingham)
Moz Stewart	Co-developer	The UK Right 2 Rent Register
Vicks Johnson	Associate Director	Devon Clinical Commissioning Group
Matthieu Lambert	Chief Executive	Enterprise Homes Group
David Mullins	Emeritus Professor of Housing	University of Birmingham
Gavin Mullaley	Director	Cornerstone Partnership
Chris Smith	Founder and Managing Director	Centre for the New Midlands
Halima Sacranie	Research Lead, Housing and Communities Research Group, University of Birmingham; Housing and Communities Advisory Board Chair, Centre for the New Midlands	University of Birmingham, and Centre for the New Midlands
Carly Jones	Chief Executive	SIFA Fireside
Jackie Kings	Strategic Manager	Plymouth City Council
Rick Henderson	CEO	Homeless Link