



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 <u>Regulator for Social Housing</u>; 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

Jams Jameses

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

Centrepoint

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

Deputy Mayor of London
Tom Copley for Housing and Greater London

Residential Development Authority

Thea Raisbeck Honorary Research Fellow University of Birmingham

Chair, WMCA

Homelessness Taskforce Birmingham City

Cllr Sharon Thompson

Members Advisory Group, Council

West Midlands Region

Cllr Ian Ward Leader of the Council Birmingham City

Council

Cabinet Member for Cllr Shabrana Hussain Homes and Birmingham City

Ilr Shabrana Hussain Homes and Council

Neighbourhoods

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



Jane Brannan



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

Group Leader Housing Barnsley Metropolitan

Borough Council

Paul Powell Director Succour Haven CIC

Daniel Evans National Housing Adullam Homes Housing

Manager

Association Ltd.

Birmingham City Council

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 Ba

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 Rutherfoord CEO Single Homeless Project

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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

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Yours sincerely,

Ashley Horsey

Chief Executive

Commonweal Housing

Allyttoney

Cllr James Jamieson

Chairman of the Association

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Local Government Association





And we the undersigned:

National Housing National Housing Federation Federation

Matt Downie Chief Executive Crisis

Dominic Bradley Group Chief Executive Spring Housing

Steve Douglas Chief Executive St Mungo's

Director of Policy and **Balbir Chatrik** Centrepoint Communications

Chartered Institute for

Gavin Smart Chief Executive Housing

Jean Templeton Chief Executive St Basils

Bridget Young Director NACCOM

Farah Nazeer Chief Executive Women's Aid

Kathy Mohan Chief Executive **Housing Justice**

Deputy Mayor of London **Greater London**

for Housing and Tom Copley Authority Residential Development

University of Thea Raisbeck Honorary Research Fellow Birmingham

Chair, WMCA

Homelessness Taskforce Cllr Sharon Thompson

West Midlands Region

Birmingham City

Birmingham City

Members Advisory Group, Council

Birmingham City Cllr Ian Ward Leader of the Council

Council

Cabinet Member for Cllr Shabrana Hussain

Homes and Council Neighbourhoods

Leader of the Council **Hull City Council** Cllr Daren Hale

Deputy Mayor **Bristol City Council** Cllr Asher Craig





Cllr Mohammed Khan Blackburn with Darwen Leader of the Council CBE **Borough Council**

West Midlands Police and Simon Foster West Midlands Police Crime Commissioner

Assistant Police and Tom McNeil West Midlands Police Crime Commissioner

Joanne Anderson Mayor of Liverpool Liverpool City Council

Leader of the Council Blackpool Council Cllr Lynn Williams

Leader of Sheffield City Cllr Terry Fox Leader of the Council

Council

Leader of the Council Cllr Bev Craig 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

Evolve Housing + Chief Executive Jeremy Gray

Support

Greater Manchester Denise McDowell Chief Executive

Immigration Aid Unit

Helen Syrop Manager Hope Housing

Michael Patterson Author Supported Housing Blog

Salma Ravat One Roof Leicester Manager

ACAP (Ashton Churches Dr Chris Wooff Joint Leader

Asylum Project)

Standing Together Gudrun Burnet CEO

Jane Williams **CEO** and Founder The Magpie Project



Rebekah Douglas



Mick Clarke Chief Executive The Passage

Richard James Chief Executive YMCA St Paul's

Liz Zacharias Director Campbell Tickell

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Coventry Citizens Advice

Jim Nicholl Acting Chair

G 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

Cornerstone Partnership

Gavin Mullaley Director

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

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