



EAST STAFFORDSHIRE BOROUGH COUNCIL

REPORT COVER SHEET

Title of Report:	Review of Supported Housing for Working Age Adults	To be marked with an 'X' by Democratic Services after report has been presented
Meeting of:	Corporate Management Team – 18 September 2024	X
	Pre Cabinet – 26 September 2024	X
	Leader's / Leader of the Opposition's Advisory Group – 3 rd October 2024 / 9 th October 2024	X
	Cabinet – 21 October 2024	
	Audit Committee [DATE] / Scrutiny Regeneration, Development and Market Hall Committee [DATE] / Scrutiny Health and Well Being Committee [DATE] / Scrutiny Climate Change and Environment Committee / Scrutiny Value for Money Council Committee [DATE]	



<p>Is this an Executive Decision:</p>	<p>NO</p>	<p>Is this a Key Decision:</p>	<p>NO</p>
<p>Is this in the Forward Plan:</p>	<p>YES</p>	<p>Does this report contain Confidential or Exempt Information:</p> <p>If the report Contains Confidential Information, please provide reason.</p> <p>If the report contains Exempt Information, please state relevant paragraph from Schedule 12A LGA 1972:</p>	<p>YES - Appendix 2</p> <p>Only Appendix 2 - Paragraph 3 - Information relating to the financial or business affairs of any particular person (including the authority holding that information).</p>

Essential Signatories:

ALL REPORTS MUST BE IN THE NAME OF A HEAD OF SERVICE



Monitoring Officer: **John Teasdale**

Date: 5 August 2024 Signature: J. Teasdale

Chief Finance Officer: **Lloyd Haynes**

Date: 5 August 2024 Signature: L. Haynes

EAST STAFFORDSHIRE BOROUGH COUNCIL

Report to Cabinet

Date: 21 October 2024

REPORT TITLE: Review of Supported Housing for Working Age Adults

PORTFOLIO: Environment and Housing

CHIEF OFFICER: Thomas Deery

CONTACT OFFICER: Brett Atkinson Ext. No. x1123

WARD(S) AFFECTED: Multiple

1. Purpose of the Report

- 1.1. To review the supported housing sector in East Staffordshire following targeted activity to drive up standards.

2. Executive Summary

- 2.1. The supported accommodation sector has stabilised and there are early signs of a slow decline in the growth of the sector; it is believed this is partly due to the measures the Council has put into place through the introduction of the Gateway process, a willingness to progress to Housing Benefit Tribunal where required and the recruitment of a Supported Housing Visiting Officer. In general the standard of supported accommodation has been found to be in line with the regulations, with only relatively small improvements identified.
- 2.2. The Supported Housing (Regulatory Oversight) Act 2023 will bring about significant changes in the coming years, but the detail is unknown pending implementation by the Secretary of State.
- 2.3. The recommendation is for Cabinet to endorse the approach that is being taken to driving up standards in the supported accommodation sector.

3. Background

3.1. What is supported housing?

3.2. Supported housing is utilised to assist households that are unable to manage their own independent accommodation and thus need care and/or support. These schemes provide accommodation alongside support, supervision or care to help people live as independently as possible. Supported accommodation is generally transitional in nature and occupied by a wide cross section of vulnerable citizens; many with multiple or complex care and support needs and often with no other option to meet their housing need.

3.3. Common presenting issues include: homelessness, substance misuse, mental health problems, lack of life skills, learning disabilities. These are not always distinct groups and many individuals may have multiple needs. Figure 4, below at para. 5.11 provides a detailed breakdown of the stated reasons for the referral into supported accommodation.

3.4. Clients with these needs would generally be rejected by mainstream landlords due to concerns over the likelihood tenancy failure and the associated cost, and where the landlord was persuaded to offer accommodation repeat homelessness would be a significant risk unless outside assistance was provided in order to prevent this outcome. Such assistance is in short supply. Historically there was funding for 'floating support' however very little of this service remains since the demise of the County's Supporting People Fund in 2016.

3.5. The supported housing sector is diverse, comprising housing associations and local council housing, as well as charities and voluntary organisations. Housing providers and schemes can vary significantly in size and scale: from large organisations with tens of thousands of residents across the country, to smaller local providers who may own one property.

3.6. The relationship between Housing Benefit and Supported Housing

3.7. 'Exempt Accommodation' was created within the Housing Benefit (HB) Regulations¹ to acknowledge the higher costs of providing and running certain types of supported accommodation, e.g. homeless hostels and older persons' accommodation. For an Exempt Accommodation scenario to exist ALL of the following 4 criteria must be fulfilled:

3.7.1. The landlord must be a non-metropolitan county council, or a voluntary organisation, or charity or Housing Association.

3.7.2. The landlord must have legal interest in the properties concerned (ownership or lease)

3.7.3. The tenants concerned must need "care, support & supervision" (in case law terms this means "more than normal property management functions")

3.7.4. The additional services to meet those needs ("Additional/Intensive Housing Management") must be provided by the landlord or an agent on its behalf

¹ <http://www.legislation.gov.uk/ukdsi/2013/9780111531938/schedule/1>

- 3.8. Attaining 'exempt accommodation' status is significant for the landlord because the rules are more favourable in the following areas:
- 3.8.1. Levels of rent and charges which can be paid for by benefits are significantly higher.
 - 3.8.2. The claims are still managed by local Councils rather than the DWP under Universal Credit, and are paid directly to the landlord.
 - 3.8.3. Recent benefit reforms such as the Benefit Cap and Under-Occupation regulations are not applicable to exempt accommodation cases.
- 3.9. Although there must be care, support and supervision provided by or on behalf of the landlord, this cannot be paid for by HB. To be an eligible charge² for HB purposes the charge must be connected with the provision of adequate accommodation having regard to the personal needs of that tenant group. Therefore the significantly higher rates of HB payable for exempt accommodation arise from activities connected to the support, but not the support itself e.g. cost of the accommodation (normal rent), intensive housing management, furniture & household equipment provided for the use of residents, cleaning of communal areas and gardening.
- 3.10. With the exception of the cost of the accommodation, intensive housing management is frequently the largest single eligible charge driving up the amounts payable in respect of exempt accommodation. Landlords charging for this perform functions that are different to that of an 'ordinary' landlord. These functions have an impact on the resident's life, because of the nature of the clients served by that accommodation.
- 3.11. Following a 2017 consultation, the government decided not to pursue any changes to the exempt housing benefit arrangements with a published response³ in 2018. The government said that funding for all supported accommodation should continue to be provided by keeping the housing benefit system in place, administered and paid by local authorities. Therefore, local authorities will continue to be responsible for funding supported accommodation through housing benefit administration and payment.
- 3.12. There are significant financial risks for the Council arising from the sector, and the subsidy calculation is complex but is primarily driven by the status or type of accommodation provider. Further information on this is provided at Appendix 1.

4. Contribution to Corporate Priorities

- 4.1. CP Target COM09 - Delivering Housing and Homelessness Support, Complete a review of the Supported Housing Sector

² <https://webarchive.nationalarchives.gov.uk/20111115165911/http://www.dwp.gov.uk/docs/a22-2008.pdf>

³

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/732692/Supported_Housing_Funding_Consultation_Response.pdf

5. Overview of Supported Housing in East Staffs

5.1. The Council saw sustained growth in supported housing for working age adults between 2018 and 2020, but that has now stabilised and there are early signs of a slow decline.⁴ Currently the Council has 7 supported accommodation providers in receipt of exempt Housing Benefit providing services to around 338 people.

5.2. Figure 1: No. of Beds in Supported Accommodation⁵

Provider	Bed Spaces Mar 2020	Bed Spaces Mar 2021	Bed Spaces Mar 2022	Bed Spaces Mar 2023	Bed Spaces Mar 2024
RP	145	154	159	155	145
Non RP	153	168	125	121	119
Total	298	322	284	276	264
Disputed Providers			112 ⁶	90	65 ⁷
Grand Total			396	366	329

5.3. The additional disputed beds bear all the hallmarks of supported housing in general, but are in 'dispute' because the Council has recently had their decision overturned at Tribunal and is currently considering whether to make an appeal. Engagement and data are therefore limited in these cases. The Tribunal upheld a similar Council decision last year, further details can be found in Appendix 2.

5.4. The growth in the number of providers who are Not for Profit as opposed to being a Housing Association / Registered Provider of Social Housing has created a substantial cost pressure on the Council. The difference in how the subsidy calculation works in each case is set out in Appendix 1. The Council's Housing Strategy states that: "For quality assurance and budgetary reasons the Council intends to increase the percentage of supported beds provided by Housing Associations."

⁴ Whilst is true in Burton upon Trent currently it isn't the national trend so we need to continue to be resilient given the national picture.

⁵ For various reasons, there is no good data on the numbers of units of and people living in supported housing – a fact that is recognised by the [National Audit Office](#). These figures have been produced utilising data on Housing Benefit Claims, Housing Options intelligence, and in respect of the 2023 and 2024 datasets the work of the Supported Housing Visiting Officer.

⁶ This figure includes a provider who has been awarded exempt HB in 2020 and 2021, but had their claims cancelled by Mar 2022, as well as new provider who moved into the area and was disputed by Mar 2022.

⁷ Following the court's decision the new entrant has left the area, but the other more established provider has only reduced in size having recently succeeded in making their case at Tribunal.

5.5. Figure 2: Exempt HB Claims from Not for Profit Organisations

Row Labels	2021-2022	2022-2023	2023-2024
Total Exempt HB Payments to Not for Profit Orgs	£850,642,00	£923,417,00	£982,482,00
Subsidy Claimed from Central Govt.	£524,477,00	£619,326,00	£691,760,00
Cost to the Council	£326,165,00	£304,091,00	£290,722,00

- 5.6. The Council has sought to secure value for money from the sector over successive years by closely following the work of the pilot authorities⁸ and adopting good practice when available, as well as participating in DLUHC panel consultations. In 2019 the Council adopted a project plan⁹ to improve value for money from the sector, and it is believed that this has been partly responsible for preventing further growth.
- 5.7. Following an unsuccessful bid for funding from the Supported Housing Improvement Programme¹⁰, the Council has invested from its own reserves in order to implement part of the original proposal which involved providing additional resource for rigorous assessment of the Housing Benefit regulations. That work is considered in more detail in Section 6: Feedback from the Supported Housing Visiting Officer (hereafter SHVO).
- 5.8. The SHVO has been evaluating pathways into supported housing to understand both how the sector grew between 2018 and 2021, and then how it has sustained itself at roughly the 2021 level since. There were two supported accommodation providers who recorded the number of referrals received on a monthly basis which are presented in figure 3. Please note this includes self-referral as well as referral by a professional. The figures below are provided simply to show activity in the sector as other pertinent information was not available; e.g. number accepted and declined by reason, how many were accommodated, how many are from outside ESBC etc.

⁸ <https://www.gov.uk/government/publications/supported-housing-oversight-pilots-independent-evaluation>

⁹ <https://www.eaststaffsbc.gov.uk/council-democracy/committees/cabinet/2021-06-14-000000>

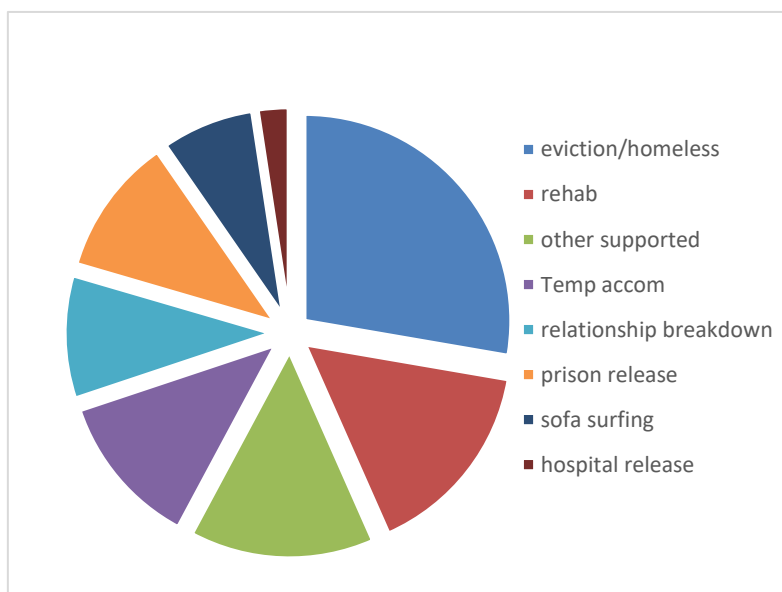
¹⁰ <https://www.gov.uk/government/publications/supported-housing-improvement-programme-prospectus>

5.9. Figure 3: Record of the number of Referrals Received

Month & Year	Provider 1 - No of Referrals Received	Provider 2 - No of Referrals Received
Jan-23	21	4
Feb-23	13	2
Mar-23	31	8
Apr-23	21	3
May-23	27	8
Jun-23	33	20
Jul-23	21	4
Aug-23	31	8
Sep-23	28	6
Oct-23	26	16
Nov-23	31	18
Dec-23	9	15
Jan-24	26	10
Feb-24	19	7
Mar-24	19	8
Apr-24	21	2
May-24	23	12

5.10. The SHVO has examined the referral paperwork for individuals who were residing in supported housing at the time of his assessment. The chart below provides a representation of the primary reason for the referral.

5.11. Figure 4: Primary Reason for Referral of current Residents in Supported Accommodation



- 5.12. It is noticeable that eviction/homelessness is the largest single reason for referral and identified support need. There is significant pressure on single person's accommodation. Approximately half of all applicants to the Council's Housing Register are looking for 1 bedroom accommodation. This has been relatively consistent over several years and it has been asserted by various professionals that supported accommodation can sometimes act as substitute for affordable single person's accommodation; i.e. the individual is homeless but does not need support, and if it were available they could have independent accommodation at a fraction of the cost.
- 5.13. Once accommodated it is the role of the provider to ensure that the resident's needs are addressed via a support plan with the objective of enabling the resident to move on into independent living within a period of 2 years or less.¹¹ It must be a joint effort from both provider and client to actively address their needs via 1-1 support/key working sessions, and if needed seek specialist advice or support from external agencies.

6. Feedback from the Supported Housing Visiting Officer

6.1. The Gateway Process

- 6.2. Following the introduction of government guidance,¹² the Council began implementing¹³ standardised assessment of new providers and schemes seeking to claim exempt rates of Housing Benefit for supported accommodation. A thorough Gateway process applies to all prospective new entrants to the market, demonstrating that a robust set of expectations apply across the piece. The Gateway also provides a single response to all providers who may have different contacts within the Council, and gathers all the information the Council needs to assess new providers and schemes, enabling the panel to benchmark and make comparisons between providers
- 6.3. The standardised assessment process requires potential new providers to engage with the Council prior to setting up a scheme and requiring their tenants / licensees to submit a claim for exempt rates of housing benefit.
- 6.4. The government guidance states that local authorities can rely on their powers to research and collect evidence on the provider and scheme in relation to a claim for Housing Benefit by an individual, to assess whether the eligibility conditions have been met for specified accommodation (as per regulation 86 of the Housing Benefit Regulations 2006); and inspect local accommodation

¹¹ There is a national issue with move on accommodation and in particular 1 bed properties that are creating barriers to move on after 2 years and keeping people in very expensive accommodation longer than they need it for. This is also denying people in need finding supported places and driving demand for new providers into the area.

¹² <https://www.gov.uk/government/publications/local-authority-interventions-to-improve-quality-in-supported-housing/local-authority-interventions-to-improve-quality-in-supported-housing#conducting-a-standardised-assessment-of-new-providers-and-schemes>

¹³ EDR No. 422.22

conditions and enforce improvements and removals of hazards where needed (Housing Act 2004).

6.5. The assessment has a clear structure through which providers/schemes can proceed at different speeds depending on their level of expertise, local need etc.

6.6. The benefits of working with providers on a scheme from the start include:

6.6.1. Developing a positive working relationship with the provider to ensure a commitment to delivering good accommodation and quality support services is in place early on.

6.6.2. Checking whether the scheme, once future claims are made from a resident, is unlikely to meet the criteria for specified accommodation (e.g., including exempt accommodation), as set out in Housing Benefit regulations, before a Housing Benefit claim is made.

6.6.3. Meeting local need more effectively by advising providers on local demand and priorities.

6.7. Between June 2023 and June 2024 there have been 13 applications to the gateway process, and to date none of the prospective new providers have moved into the area. None of the prospective providers were Registered Providers / Housing Associations, and most were new organisations with no demonstrable track record. The same process is used if an existing provider wants to expand and increase the units they currently have.

6.8. Visits to Supported Housing Schemes

6.9. In Year 1, the SHVO conducted 107 visits to properties and had access to over 98% of resident paperwork.¹⁴ The intended outputs from the visits and associated activities can be broken down as follows:

6.9.1. Assess housing and property management standards to ensure provision of safe, well managed and maintained accommodation.

6.9.1.1. Referral to Environmental Health colleagues where concerns are identified.¹⁵

6.9.2. Improve the quality of support and accommodation for residents of the sector; enabling providers with the right motivations to improve, and others to close in a managed way.

6.9.2.1. Review the support to ensure that the support is “more than minimal”; to ensure that sub-standard Schemes are not given exempt status, and to provide an opportunity for Schemes which do not meet minimum standards to make appropriate improvements.

¹⁴ In order to demonstrate that support is provided as per the Housing Benefit regulations, it is necessary for the provider to release paperwork which has recorded the same.

¹⁵ Proportionally the Environmental Health Team have received more complaints about rented properties managed by CICs. Nearly 16% of licensed HMOs were managed by CICs in 2024. This has resulted in an increased workload in a small team and more legal notices having to be served.

6.9.3. *Residents of supported housing are moved into independent housing when it is appropriate to do so, making the support available for someone who needs it and facilitating the desired progress for the individual.*

6.9.3.1. Residents who are identified as being ready to transition into independent living will be offered appropriate support to do so.

6.9.4. *The Exempt HB that is paid has met the most rigorous standards, representing both Value for Money and Not for Profit.*

6.9.4.1. Intensify the scrutiny of eligible costs, and the amount of those costs to ensure only reasonable costs are claimed via exempt housing benefit (including revisiting the claims of existing providers).

6.9.4.2. Assess providers thoroughly for any potential structures which are designed to take financial advantage or derive profit of the housing benefit scheme.

6.10. As at July 2024 the SHVO has visited all 7 supported accommodation providers and requested to visit 107 residents, 45 of these residents either refused or simply did not attend the meeting. This level of attrition was expected, and is replicated by Hull City Council who piloted this approach.¹⁶ The paperwork that is utilised to collect pertinent information is amended from templates provided by Hull City Council.

6.11. The SHVO's approach to assessment is to assess between 30-50% of the providers resident base, depending on size, in order to achieve a representative sample. This will result in a report which is agreed by a panel comprising of middle managers from Housing Benefits and Housing Options. Where concerns are identified a set of actions will be required of the provider with a timescale for implementation. If the concerns are particularly wide ranging a full evaluation of the provider may be required, increasing the no. of residents who are interviewed and their support assessed to over 90%.

6.12. In general the supported accommodation providers in East Staffordshire have been assessed as being of a good standard. The SHVO did not come across any major concerns regarding either the support, care and supervision being offered or in the physical condition of the properties that were inspected. All providers were asked to make some improvements although generally they were relatively small issues, common examples include

6.12.1. Support, Care and Supervision – The Housing Benefit Regulations do not specify the amount of support required, but it has become industry standard to look for a minimum of 1 hour of one to one support per week. When it has been identified that there is no evidence of the same, the expectation is set out to the provider with follow up after a defined period, usually 3 to 6 months depending on the level of concern. This is crucial to the progression of the client in addressing their needs and hopefully making the changes needed to turn their life around to prepare them for independent living.

¹⁶ <https://www.gov.uk/government/publications/supported-housing-oversight-pilots-independent-evaluation>

- 6.12.2. Charges included in the exempt Housing Benefit – supported accommodation providers have submitted a breakdown of the rental cost. During visits the SHVO assesses whether the charges levied for services are being delivered. Services like window cleaning, gardening and painting and decorating have been identified as weaknesses for providers to address.
- 6.12.3. Preparation for ‘Moving On’ – Supported housing of this type is intended to prepare residents for independent living, typically in less than 2 years unless there are exceptional circumstances. The support plan and support provided should be targeted towards providing the resident the skills they need to live independently, where there is insufficient focus or actions directed towards this end this will be returned as an area for improvement.

7. Supported Housing (Regulatory Oversight) Act 2023

- 7.1. The Supported Housing Act¹⁷ was first introduced as a Private Members’ Bill to respond to ongoing reports¹⁸ of problems with the quality of supported exempt accommodation. It is unusual for a Private Members’ Bill to become law, but the Bill was supported by the government and attracted cross-party support due to the severity of the issues in the exempt accommodation sector.^{19 20}
- 7.2. Although the Act officially came into force on 29 August 2023, it effectively gave the Secretary of State a set of powers which could be utilised subject to certain provisions. The key powers and associated timescales are provided below.
- 7.3. The Act contains the following:
- 7.3.1. Provides for the creation of a national expert advisory panel to advise on matters related to supported housing before one year has passed.*
- 7.3.1.1. The panel must include at least one person who represents the interests of different key groups, including: social landlords, local authorities, social services, charities providing supported exempt accommodation and residents of supported exempt accommodation.
- 7.3.1.2. Recruitment took place between May and June 2024, but no further update has been provided.²¹
- 7.3.2. Requires local authorities in England to review supported housing in their areas and develop strategies before such date as may be specified in regulations made by the Secretary of State.*
- 7.3.2.1. No date has been provided, and given that this will be the first such exercise a relatively extended period for compliance is expected.
- 7.3.2.2. Local authorities must undertake this exercise before the end of each five-year period beginning with the day on which it published its most recent supported housing strategy.

¹⁷ <https://www.legislation.gov.uk/ukpga/2023/26>

¹⁸ <https://www.crisis.org.uk/media/246160/crisis-policy-briefing-exempt-accommodation.pdf>

¹⁹ <https://committees.parliament.uk/work/1688/exempt-accommodation/publications/>

²⁰ <https://www.nao.org.uk/reports/investigation-into-supported-housing/>

²¹ <https://www.housing.org.uk/news-and-blogs/news/latest-updates-on-supported-housing-oversight/>

7.3.3. Gives the Secretary of State power to introduce national support standards.

7.3.3.1. The standards could address the type or condition of accommodation, as well as the care or support provided.

7.3.3.2. We currently have guidance entitled 'Supported housing: national statement of expectations'²², and it seems likely that this will inform the standards given its relatively recent publication.

7.3.4. Gives local authorities power to create local licensing schemes for exempt accommodation.

7.3.4.1. Regulations under this section may not be made unless a draft of the instrument has been laid before and approved by a resolution of each House of Parliament.

7.3.4.2. If regulations have not been passed before one year of the act having been passed, the Secretary of State must publish a report setting out the progress that has been made towards doing so. Thus we can expect a report before the end of August 2024.

7.3.5. Gives the Secretary of State an option to introduce a new planning Use-Class for exempt accommodation.

7.3.5.1. The Secretary of State must, before the end of the period of three years beginning with the date on which the first licensing regulations are made, review the effectiveness of the licensing scheme and consider whether a new planning Use-Class would be appropriate.

7.4. So, in summary by the end of August 2024 there should have been an expert advisory panel and a report on progress towards bringing in a licensing scheme. As at 18 September 2024, these developments have not been made public if they have happened. The licensing scheme itself will need to be approved by each of the Houses of Parliament and therefore is not imminent. Potential changes to the planning Use-Classes will need to be considered after 3 years of the licensing schemes being in place. There has been no announcement, nor is there a fixed timescale in the legislation, as to when the review and supported housing strategy will need to be implemented.

7.5. It is difficult to make any plans or predictions on the strength of the above, as nothing has yet happened and it is not clear what priority this work will be given by the new government. The work of the Supported Housing Visiting Officer certainly puts us in comparatively strong position to undertake the review of the sector, and to inform the development of the licensing scheme when the time comes. The Supported Housing Visiting Officer is currently funded utilising Housing Option Fund Reserve, with the current contract due to expire at the end of May 2025 unless alternative funds are made available.²³

²² <https://www.gov.uk/government/publications/supported-housing-national-statement-of-expectations/supported-housing-national-statement-of-expectations>

²³ There are insufficient funds remaining in homelessness reserves to provide for a further 12 months.

8. Financial Considerations

This section has been approved by the following member of the Financial Management Unit: NL/AB/Daniel Binks

- 8.1. The main financial issues arising from this Report are as follows: The Supported Housing Visiting Officer post, highlighted in section 7.5, is currently funded from the Housing Option Fund Reserve until the current contract expires at the end of May 2025. If the post is expanded beyond this period additional revenue funding will be required. The estimated revenue funding is as follows:

Revenue	2024/25	2025/26	2026/27
		£36,000	£44,000

Capital	2024/25	2025/26	2026/27
N/A			

- 8.2. Any decision on the future of this post should be considered in the context of potential cost reduction to the Council derived from the work currently carried out by the post, as well as requirements related to legislative changes set out in this report. Consideration for continued financial support for this resource post May 2025 will be considered and discussed as part of the 2025/26 budget process.

9. Risk Assessment and Management

- 9.1. The main risks to this Report and the Council achieving its objectives are as follows:

- 9.2. **Positive** (Opportunities/Benefits):

9.2.1. Improve the availability of supported accommodation for those requiring the same where the current residents are enabled to move on.

9.2.2. Opportunity to control growth in Housing Benefit costs.

9.2.3. Improve the standard of housing where applicable.

9.2.4. Provide a clear and consistent service to new providers and existing providers setting up new schemes, hopefully deterring unprofessional providers seeking to enter the market.

9.2.5. Opportunity to utilise information gained in the assessment during subsequent inspections to check that schemes have lived up to their initial submissions.

- 9.3. **Negative** (Threats):

9.3.1. Reputational risk that measures are regarded as heavy handed and disproportionate.

9.3.2. Sector becomes destabilised, negatively impacting on residents.

9.4. The risks do not need to be entered in the Risk Register. Any financial implications to mitigate against these risks are considered above.

10. **Legal Considerations**

*This section has been approved by the following member of the Legal Team:
Glen McCusker – Locum Solicitor and Deputy Monitoring Officer.*

10.1. These are detailed in the main body of the Report.

11. **Equalities and Health**

11.1. **Equality impacts:** The subject of this Report is not a policy, strategy, function or service that is new or being revised. An equality and health impact assessment is not required.

11.2. **Health impacts:** The outcome of the health screening question does not require a full Health Impact Assessment to be completed. An equality and health impact assessment is not required.

12. **Data Protection Implications – Data Protection Impact Assessment (DPIA)**

10.1. A DPIA must be completed where there are plans to:

- use systematic and extensive profiling with significant effects;
- process special category or criminal offence data on a large scale; or
- systematically monitor publicly accessible places on a large scale
- use new technologies;
- use profiling or special category data to decide on access to services;
- profile individuals on a large scale;
- process biometric data;
- process genetic data;
- match data or combine datasets from different sources;
- collect personal data from a source other than the individual without providing them with a privacy notice ('invisible processing');
- track individuals' location or behaviour;
- profile children or target marketing or online services at them; or
- process data that might endanger the individual's physical health or safety in the event of a security breach

10.2 Following consideration of the above, there are no Data Protection implications arising from this report which would require a DPIA.

13. Human Rights

13.1. There are no Human Rights issues arising from this Report.

14. Environmental Impacts

Consider impacts related to the Climate Change & Nature Strategy aims:

- Reducing greenhouse gas emissions (climate change mitigation)
- Preparing for future climate change (adaptation)
- Protecting and enhancing nature
- Using resources wisely and minimising waste and pollution

14.1. Does the proposal have any positive or negative environmental impacts? No

14.2. If so, are these impacts **significant**? No

15. Recommendation(s)

15.1. To endorse the approach that is being taken to driving up standards in the supported accommodation sector.

15.2. That consideration for continued financial support of the Supported Housing Visiting Officer will be discussed as part of the 2025/26 budget process.

16. Background Papers

16.1. The Housing Strategy

17. Appendices

17.1. Appendix 1: Subsidy Levels

17.2. Appendix 2: CONFIDENTIAL HB Tribunal Cases