

## Summary of Emmaus UK response

### Government consultation on the Supported Housing Act

#### Background

- The government's Supported Housing Act is introducing new national standards for supported housing, a licensing regime, changes to Housing Benefit, and proposals for a planning use class for supported housing.
- Emmaus UK is undertaking a peer-led research project to help shape the implementation of the Act. Emmaus residents have been trained to be researchers, helping lead our engagement with staff and other residents in supported housing.
- During the recent government consultation on the Act, running from February to May 2025, we received over 160 responses to an online survey on key aspects of the Act, ran workshops with 23 residents, held meetings with staff from throughout Emmaus's 29 local branches, and hosted a roundtable with small supported housing providers.
- The below is a summary of key points from our response, drawing on this research. We will be continuing our research and publishing our own report later this year.

#### Key points

Our **key points**, encapsulating the core messages we wanted to get across in our response, are:

- 1) While welcoming the introduction of new supported housing standards, we are **concerned about the administrative and financial burden on providers** of demonstrating compliance, in particular small providers. We urge the government to consider ways to lessen this, including through financial support, training and guidance.
- 2) The Act needs to be **implemented consistently across the country**. In the current proposals, discretionary conditions introduced by local authorities could create geographical variations, while the proposed definition of a 'scheme' means different providers could experience the implementation of the Act in very different ways.
- 3) We must **guard against local authorities making decisions about licensing inappropriately based on cost pressures**, and ensure different local authority teams are involved in the licensing process.
- 4) As a national charity working to end homelessness, we are **concerned about a possible rise in homelessness** caused by supported housing schemes closing down after not receiving a licence, and want to see assurances that national and local government will have strategies in place to prevent this rise in homelessness. Supported accommodation providers may also actively choose to close services as they become unviable as a result of the costs and burdens of regulatory compliance.
- 5) We ask the government to **continue putting lived experience at the heart of the Supported Housing Act**. Such as by creating a diverse range of ways residents can

shape the services they live in as part of the empowerment standard, and drawing on the input of residents in shaping needs assessments and support plans.

## National Supported Housing Standards and Principles

- 95% agreed the government's **principles** reflect core elements of good quality supported accommodation. There was also strong support in the survey for each of the government's proposed standards, ranging from 88% to 97% agreement.
- Living in a safe environment was linked to having a **sense of security**, and residents felt it was important to know supported accommodation will be a place where they can stay while they address any issues they have.
- On the **person-centred support standard**, specific support should be provided for residents moving on from supported accommodation. While some residents may benefit from having the same support worker for the duration of their stay, for others it is beneficial to build relationships with different staff.
- Providers should have different resident feedback and involvement approaches that are accessible to all, as part of the **empowerment standard**.
- The government should require providers to consider the principles of Psychologically Informed Environments (PIE) as part of the **environment standard**.
- Relating to the **staff and safeguarding standard**, it can be beneficial (if possible) for staff to have lived experience of the issues they are supporting residents with. The government needs to consider how providers can be supported with cost and resourcing issues to ensure training and qualification requirements can be met. It also needs to clarify whether this standard applies to volunteers.
- As part of the **local need standard**, local strategies need to account for the fact that need will not be static over a 5 year period. A strong voice needs to be given to providers and residents, and time allowed to refocus provision.
- The **importance of diversity, equity and inclusion could be strengthened** throughout the principles and standards, including to ensure needs are met for groups including LGBTQ+ people and women.
- Where possible, the government should **avoid duplication with other regulatory frameworks followed by providers**, including those set by the Regulator for Social Housing or Ofsted. There should be bespoke arrangements for provision already regulated.

## Needs assessments and support plans

- The language used and approach taken should be **strengths-based** in order to focus on strengths, assets and abilities to meet defined goals, alongside needs and support requirements.
- Support plans should be updated regularly, not be defined too narrowly and include more traditional group/1:1 and therapeutic support, alongside other support activities including volunteering, work experience, training, wellbeing and social activities.

## Licensing regime

- Overall, we support the introduction of a licensing regime that will help ensure providers meet the new National Supported Housing Standards, and drive out bad-quality organisations from the sector.

- However, these proposals could bring a potential **administrative and cost burden on providers** to demonstrate compliance, particularly for small providers.
- The government should **reconsider the definition of a ‘scheme’** for the purposes of applying and paying for a licence. Under proposals, each separate postal address would require a separate licence. As one example, providers with lots of dispersed supported housing of only a few units each, would need many different licences, driving up costs, and disincentivising this kind of supported housing.
- **Consistency is vital in how the new national standards are implemented.** Providers need to have confidence that licensing arrangements will not vary significantly between different local authorities. **We don’t believe it will be necessary for different authorities to include discretionary conditions on licenses, and we also call for a national, standardised licence fee rate or cap,** so some authorities don’t charge significantly more than others.
- **Providers should be given good support, guidance, and training to meet the new standards and apply for a licence.** Including requirements being transparent, having an adequate lead in time for meet the standards, and local authorities providing training to providers in their area.

## Housing Benefit

- While overall we agree with linking Housing Benefit to the new licensing regime, when administering these new measures input is needed from a number of local authority teams including Housing Benefit, housing options, planning and environmental health. This would help **ensure Housing Benefit teams alone are not making decisions about licenses, with potential cost control measures inappropriately impacting decisions.**
- National government and local authorities must ensure a strategy is in place for supporting residents who live in supported housing which does not receive a licence. These residents could be put at **risk of homelessness.**
- **We disagree that ‘supervision’ is one aspect of ‘support’ and think there are clear differences in the definition of each.**

## Planning use class for supported housing

- We see **positives and negatives** to the proposal for a new planning use class for supported housing. On the **positive side**, it could create the **opportunity to revise some planning standards** specifically for supported housing, e.g. minimum size standards to make supported housing more financially viable.
- On the **negative side**, a use class could **increase local opposition** to supported housing schemes, with people more aware of the proposed development being for this purpose. This could increase the ‘othering’ of supported housing residents.
- If a use class is introduced, it should include the **requirement for local authorities to consider this alongside their supported housing strategy.** If local authorities via their gaps and needs analysis identify that additional/a different model of supported housing is required, this should be considered within their local plan.