	Housing Scrutiny Committee 24 November 2026
	Report from the Corporate Director of Residents and Housing Services
	Lead Cabinet Member for Housing, Homelessness and Renters - Cllr Robert Johnson

Supported Accommodation

Wards Affected:	All
Key or Non-Key Decision:	Not Applicable
Open or Part/Fully Exempt: (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
List of Appendices:	None
Background Papers:	None
Contact Officer(s): (Name, Title, Contact Details)	Jamie Slagel Head of Improvement – Housing Needs and Supported Accommodation, jamie.slagel@brent.gov.uk Edwin Mensah Head of Commissioning, Edwin.mensah@brent.gov.uk Olivia Brady Service Manager, Specialist Accommodation, Olivia.brady@brent.gov.uk

1. Executive Summary

1.1. To provide an update on supported accommodation provision in Brent, including Council operated schemes, schemes operated by other providers, and non-commissioned supported exempt accommodation. The report also provides an update on Brent's progress developing a Supported Housing Strategy, Needs Assessment and Delivery Plan and preparing for the new

licensing scheme, in line with the Supported Housing (Regulatory Oversight) Act 2023.

2. Recommendations

2.1. Consider and comment on the proposed approach to developing Brent's Supported Housing Strategy and discuss what Council priorities and principles they would like reflected in the strategy.

2.2. Discuss the future of how Brent manages supported housing to drive improvement in line with the Council's wider transformation vision, and realise the Supported Housing Strategy and associated delivery plan.

3. Detail

3.1. Contribution to Borough Plan Priorities & Strategic Context

3.1.1. Ensuring that residents have access to good quality supported accommodation when needed is crucial to achieving two Borough Plan priorities: Prosperity and Stability in Brent and A Healthier Brent. Housing is an underlying factor for both and some residents need support to be able to confidently live independently. Access to a secure home with care, support, and supervision can provide stability and lead to improved health outcomes. Brent Council is concerned that some supported accommodation does not meet these needs and so the work outlined in this paper contributes to both strategic goals.

3.1.2. More broadly this relates to Brent Council's ongoing work to develop and deliver a secure Medium Term Financial Plan which will require savings in the short- and medium-terms. The actions and proposals in this paper will help with achieving cost avoidance, thereby enabling the Council to deliver against its other priorities.

4. Overview

4.1. **What is supported accommodation?** The National Audit Office notes that "Supported housing is accommodation that is provided alongside support, supervision or care to help people with specific needs to live as independently as possible in the community. This includes, for example, older people, people with a learning disability, people with a physical disability, people at risk of or who have experienced homelessness, or people recovering from drug or

alcohol dependence. Supported housing can be short term or long-term, depending on a person's needs."[1]

4.1.1. "Supported accommodation" is a catch-all term that can apply to lots of different housing arrangements, including the following:

- Housing Related Support for residents who are homeless, rough sleeping, ex-offenders, using drugs and alcohol, with mental health issues, young people, and those fleeing domestic abuse
- Council-operated supported housing e.g. for rough sleepers
- Non-commissioned supported exempt accommodation (and supported exempt accommodation as a whole)
- Supported living, including for mental health, learning disabilities, and physical disabilities
- Extra care
- Sheltered and/or retired housing
- Supported lodgings
- Staying put accommodation
- 18+ supported accommodation, including for care experienced young people
- 16-17 years Ofsted-regulated supported accommodation
- Housing first schemes
- Shared lives schemes

Supported housing provides a crucial intermediate step for residents between formal care and living independently, and between being homeless and living independently.

4.2. **What is changing?** The Supported Housing (Regulatory Oversight) Act 2023 introduced a number of important reforms to the supported housing system, with a particular focus on reforming supported exempt accommodation (SEA). The Act introduced the Government's requirement of councils to develop a local supported housing strategy by end of 26/27. It also introduced the Government's intention to introduce a dedicated supported housing licensing scheme that Councils would be asked to deliver (see below, section 8.3).

5. Supported Housing Strategy

5.1. Introduction to the Supported Housing Strategy

5.1.1. Local Supported Housing Strategies must understand the local landscape of supported housing and set out the direction of travel to meet identified need. They must be underpinned by a comprehensive needs assessment of supply and demand, including current unmet need and a 5-year outlook, and

[1] Investigation into supported housing - NAO report, p.4

accompanied by a delivery plan. The Council must report annually to MHCLG on supply and demand and progress towards the delivery plan. The Council received New Burdens funding of £87,531 in 25/26 and will receive further funding in 28/29 to deliver this.

5.1.2. **Scope**: supported accommodation is a broad term and is categorised differently in different places. MHCLG require that the strategy covers supported exempt accommodation, retirement housing and sheltered housing, as well as the need for accessible/adapted homes. The strategy may also choose to include floating support services, housing first, shared lives, staying put, and supported lodgings accommodation. MHCLG have asked local authorities to shift to the following tripartite typology in future:

- Older people's supported housing e.g. extra care and retirement or sheltered housing)
- Long-term supported housing e.g. supported living
- Transitional supported housing

5.1.3. MHCLG guidance requires that the strategy is developed in collaboration with partners and that social services have a duty to help develop and deliver the strategy and its delivery plan.

5.1.4. Brent Council has done an enormous amount of work on supported accommodation, especially Supported Exempt Accommodation, since Autumn 2024. This has meant that the Council is in a good position and has taken up the mantle quickly to drive forward progress to develop the strategy, which is being led by the Director of Housing Needs and Support and Head of Improvement – Housing Needs and Supported Accommodation. The strategy is a good opportunity to drive forward work officers had previously identified - improving referral pathways, resident experience, and void turnaround while reducing rent arrears and evictions and developing plans to address gaps in provision. The following sections outline what is in train and the proposed plan for developing this strategy, and related key considerations.

5.2. Plan for developing the strategy

5.2.1. **Steering Group**: Around eight months ago, officers brought together the Supported Living Board and Supported Exempt Accommodation Programme Board to form a streamlined approach to strategic oversight of supported accommodation in the new Supported Housing Board. The new Board is taking a wide lens, also strategically considering Housing Related Support contracts, the Council's role in the new First Wave Plus supported accommodation scheme, extra care, and the supported housing system as

a whole. It has also brought in Children's representatives to ensure alignment with Children's work on 18+ supported accommodation. The Board has now taken on strategic responsibility for the supported housing system as a whole, reducing gaps, duplication and fragmentation and improving the resident journey and experience. The Board's goal is to support more residents back to independent living and improve residents' quality of life. Consequently, the Board is acting as the steering group driving strategy development and delivery.

5.2.2. **Governance**: MHCLG guidance asks LAs to choose an ultimate governance body responsible for signing off the strategy, monitoring progress, and annual submissions to MHCLG. They recommend this Board has senior staff, including Cabinet members, on it. MHCLG is giving LAs the opportunity to set up a new Governance board or use an existing one like the Health and Wellbeing Board. Officers propose that Cabinet signs off the Strategy, and that it is also reviewed and monitored by the Homelessness Forum to generate buy-in and scrutiny by partners and community organisations.

5.3. Officers are currently on track to publish before the MHCLG deadline of 31 March 2027.

5.4. **Data analysis and projections**

5.4.1. The Supported Housing Board is working with two corporate data analysts to complete projections of future need and supply to underpin the needs assessment.

5.4.2. It is important that the strategy is data-informed: data analysis of current provision, support needs, and unmet needs will also underpin the strategy, its priorities, and the delivery plan.

5.5. **Engagement with residents**

5.5.1. To underpin the strategy, officers are engaging with residents living in all kinds of supported housing. Where the Council has recently engaged with residents, officers propose to harness that work rather than risk engagement fatigue. Where the Council has not spoken to some residents recently, officers propose to host a set of engagement activities/events. It is crucial the strategy is underpinned by residents' lived experience.

5.5.2. **Surveys.** The Council's community engagement team have gone to residents by surveying them in/around their accommodation. The surveys focused on residents' experiences, what support they receive, what's working and what can improve. Officers received responses from 50

residents. Overall, residents identified that staff support is a clear strength, with residents consistently highlighting respectful, helpful staff, a strong sense of community, safety, and support to build independence, manage wellbeing, and progress in recovery. The main areas for improvement are clearer and more effective support for moving on from supported housing, with many residents expressing anxiety about future housing options, affordability, and uncertainty about the transition process. Residents also want more activities and employment support, better help with paperwork and finances, improved communication, stronger management of safety and resident conflicts, and faster responses to repairs, cleanliness, and property maintenance issues.

5.5.3. **Focus groups**. In addition, the Housing Needs and Support Department have organised a dedicated focus group with B3 and Voices for Homelessness. This session will allow for more detailed discussion about residents' experiences, priorities, and views. Staff also plan to bring a draft strategy and delivery plan to the Homelessness Forum hosted by Crisis in January.

5.5.4. In addition, the Council is using New Burdens funding to fund 2x Supported Housing Visiting Officers for 6 months. The Visiting Officers have now started visiting supported accommodation in the borough, starting with higher risk non-commissioned SEA. This is now allowing us to understand local provision and need, which will drive the strategy's approach, putting resident experience at the heart of the strategy.

5.5.5. **Stakeholder engagement**: to develop the strategy, officers have either already engaged with or are planning to engage with several other stakeholders, including:

- Internal stakeholders
  - Adult Social Care
  - Children's Social Care
  - Public health
  - Planning
  - Brent Safeguarding Adults Board and other safeguarding leads
- Externals:
  - Providers of all types of supported housing, including VCS
  - ICB and NHS mental health teams
  - Prisons and Probation
  - Crisis, including Single Homelessness Prevention Service
  - Bridges Outcomes Partnership
  - VCS organisations e.g. B3 and Voices for Homelessness
  - Drug & alcohol service (Via)

5.6. Key considerations for the strategy

5.6.1. This section gives an overview of officers' current shortlist of considerations for the strategy and delivery plan to address.

5.6.2. **Provider engagement and market managemen**t: Since Covid, the non-commissioned SEA market has emerged in an uncoordinated manner. Consequently, in the view of the SEA programme board, historically the council has lacked relationships with providers, providers largely shaped the market rather than the council (or partners), and there are significant gaps in provision, with too much poor quality generic support for low-needs individuals and insufficient targeted support for specific cohorts, including higher needs cohorts. To address this, as well as subsidy loss pressures, the Council has had to take a more restrictive approach over the past year, which also does not reflect the collaborative approach needed to develop a strong and stable market. Officers hope through this strategy to redevelop a clear role engaging with the market collaboratively, providing clarity on what local needs are, and shaping the market accordingly.

5.6.3. At the same time, there are significant opportunities to improve provider engagement and market management for commissioned supported housing services such as Housing Related Support contracts for mental health, substance misuse, domestic abuse, and so forth.

5.6.4. The supported living market is both large and complex, with over 100 supported living providers that we're aware of. From time to time, provider contracts do not work out and there is opportunity for improvement on a number of legacy contracts. The commissioning team have a plan for engagement for the coming year which would be good to codify in the supported housing strategy, with a goal to consolidate some contracts by working more exclusively with providers that share our values, demonstrate good quality and value for money, and adhere to our pricing schedule.

5.6.5. **Quality of support provision:** Quality of support provision in the wider sector, and in Brent, is generally considered to need improvement. Officers are proposing introducing a system to rate the quality of support, equivalent to the 'Setting the Standard' system used to classify the quality of temporary accommodation.

5.6.6. **Local connection:** A small number of providers are almost exclusively providing supported housing for residents from outside the Borough. This has come at financial cost to the council. In previous years, there has been no legal or regulatory mechanism to turn these residents down, but the new

Act allows the Council to reject applicants or schemes not in line with the Local Supported Housing Strategy. While there are clearly very legitimate reasons to access supported housing outside the borough – domestic abuse, rough sleeping, and the fact that residents may come from just outside Brent's borders – officers feel there ought to be a proportionate approach. Most providers, unless wholly catering to some of the above exceptions, should primarily cater to Brent residents.

5.6.7. **A ladder of support – pathways between provision**. Human lives do not neatly fit into boxes, and accordingly residents may require more or less support at different times. Moreover, maintaining residents in high needs supported accommodation can trap residents in a deleterious cycle of reduced independence. Instead, the council hopes to use this opportunity to align the different types of supported housing to tackle gaps in provision and enable residents to move up and down the 'ladder of support' as needed. This will include: supported living (ASC care package); extra care; Housing Related Support; non-commissioned supported accommodation; and finally independent living. The goal is for residents to move down the ladder and into independent living, while recognising that they may sometimes need to move up again, and creating the agility within the system to rapidly move them up and down as needed.

5.6.8. **Move on:** At present, there is significant variation between providers in their approach to supporting residents to move on into independent living. Overall, move on across the system is weak, both due to a genuine lack of properties and also a lack of work to support residents to take the next step. This strategy should include a clear plan to address this, improve move on, and develop an improved, coordinated, and collaborative approach to achieving move on and flowthrough.

5.6.9. **Gaps in the system:** Certain cohorts are not catered to by the current system. Some of this information will come out of ongoing desk-based data analysis and from the visiting officer inspections. However, officers are already aware of gaps around:

- Modified properties for residents with mobility requirements.
- Male only self-contained schemes for former offenders or residents on the sex register.
- Mother-and-baby units.
- LGBTQ+ provision.
- Family provision.

Staff also anticipate identifying a gap between the low-medium support needs which most supported housing caters to and the threshold for Adult

Social Care. This “high needs” cohort is not catered to and often get stuck in temporary accommodation, either because HNS cannot refer them into supported housing, or because they get evicted and return to TA.

5.6.10. **System improvements**

- Evictions & rent arrears – evictions from supported housing have increased substantially recently. Anecdotally, this is related to rent or service charge arrears due to poor clarity around responsibilities and inconsistent service charge responsibilities.
- Vulnerable persons coordinator – other areas have a dedicated officer responsibility for coordinating support for some of our most vulnerable residents.
- Unified referrals form – different supported accommodation providers have different referral forms, creating duplication and often acting as a barrier to referrals. Instead, Brent should develop and adopt one referral form for all.
- Joint assessments – residents are frustrated at needing to repeat themselves multiple times. Where the referrer, is a trusted provider, we should explore joint assessments of residents between referrer and provider.
- Provider forum – there is no dedicated space for providers to hear from the council, meet one another, and work collaboratively to drive up sector standards in Brent. This strategy should outline the goal to create this space, and resource it accordingly.

5.6.11. **Resident feedback** – the strategy should identify ways to better identify resident feedback and lived experience and ensure that this feedback informs the council’s strategy. In time, this should lead to embedding co-production into the process of planning and designing support services.

5.6.12. **Value for money and financial sustainability** – overall, supported housing does not appear to deliver strong value for money and is not financially sustainable to the council. This strategy should set out a strong plan to address both.

5.6.13. **Data and Digital** – having a good digital system makes referrals into the supported accommodation system simpler and easier, and allows better data and monitoring of moves into, between, and out of supported housing. To that end, the Housing Needs and Support Department are currently planning to procure a digital system to do just that, especially for Housing Related Support, Supported Living (including NAIL), extra care, and non-commissioned SEA, which currently operate off various spreadsheets and

email chains. This will also enable the Council to become compliant with new MHCLG data reporting requirements.

5.6.14. **Resource requirements**: Long-term, the Council must not only publish a strategy but also a delivery plan. In order to meet that delivery plan, dedicated resource will need to drive forward the work within it. That plan remains in development and is likely to include the need for resource to:

- Engage with providers – both commissioned and non-commissioned – and manage those relationships, proactively shape the market, and enable the principles of community capacity and capability building.
- Store and steward data about households in supported accommodation of various forms.
- Strategically plan and drive forward a capital programme pipeline for supported accommodation of various kinds.

6. Supported Exempt Accommodation

6.1. Introduction

6.1.1. Supported exempt accommodation is so called because it is exempt from locally set caps on housing benefit. Legally, SEA is:

Accommodation which is provided by a non-metropolitan county council in England, a Housing Association, a registered charity or voluntary organisation where that body or a person acting on its behalf also provides the claimant with care, support or supervision.[2]

6.1.2. Supported exempt accommodation (SEA) has been the subject of various reports, including a Select Committee report and more recently a BBC Panorama programme. Poor provision of SEA has been linked to neglect, abuse, profiteering and, in some cases, organised crime.

6.2. Mapping

6.2.1. At the start of the financial year, there were 1123 units of supported exempt accommodation in Brent, supporting residents with a variety of needs, especially those at risk of or with experience of homelessness, including rough sleeping, as well as domestic abuse, mental health and substance misuse. There are also some specialist units for care experienced young people and residents with physical disabilities and learning disabilities.

[2] The Housing Benefit and Council Tax Benefit (Consequential Provisions) Regulations 2006, Schedule 3

6.2.2. 352 individuals are claiming housing benefit for supported exempt accommodation operated by providers that are not registered with the Regulator of Social Housing. 771 are with Registered Providers.

6.3. Quality assurance and safeguarding

6.3.1. Staff are aware of challenges at the national level around the quality of non-commissioned supported exempt accommodation. For that reason, staff engaged directly with 6 of the council's largest non-commissioned providers in summer 2025 to understand their approach, considering their operational arrangements, safeguarding arrangements, and their approach to rent levels, evictions, and move ons. This informed the council's approach to market shaping. Since then, staff have worked to expand provision for the best quality providers and to secure its use for Brent households most in need. Meanwhile, staff have worked with lower quality providers to monitor improvements and, for the lowest quality providers, to slowly phase out their provision.

6.3.2. In addition, housing benefits staff closely monitor every single SEA housing benefit application, asking for evidence of a needs assessment and support plan, and ongoing support logs. Applications are regularly turned down or cancelled due to inability to evidence the above.

6.3.3. Staff are aware that one provider, where staff had some concerns, have now stopped operating in Brent and have safely transferred their stock and residents to alternative arrangements. The Council is working closely to support and enable this process.

6.3.4. Staff conducted a thorough site visit to two properties operated by one provider, including speaking to staff and to residents. In that case, staff were impressed by the overall quality of the properties, support, management, and impact on residents' lives.

6.3.5. Since then, the Council has brought in temporary visiting officers to conduct more visits and introduce more assurance regarding the quality of SEA in Brent. This will allow the Council to ascertain whether residents are adequately receiving support, identify high-priority issues, escalate safeguarding concerns where necessary, and identify residents ready for move on. The officers will be considering the following high level quality framework:

- Good quality accommodation
- Personalised care and support
- Safeguarding

- Resident involvement
- Genuine support need
- Clear pathways to independence
- Referrals and evictions
- Fire safety
- Health and safety
- Housing Benefit compliance
- Financial sustainability
- Fair and reasonable costs
- Affordability and value for money

6.3.6. Staff hope to identify opportunities to maintain the visiting regime, including using funding from the Government's forthcoming licensing scheme.

6.4. Safeguarding and escalation

6.4.1. Staff in Housing Needs and Housing Benefit are working closely with the Brent Safeguarding Adults Board (BSAB) to introduce a new reporting process for providers of supported housing for major incidents. This has been communicated to all providers of supported housing in Brent.

6.4.2. The safeguarding process is as follows: first, the provider must notify the Brent Safeguarding Adults Forum promptly and document the incident. Providers must have an assigned person for this purpose. Second, the provider must gather all relevant details to complete a Council form for record-keeping. Third, the provider must conduct an internal review, address key questions, and identify lessons learned. Fourth, they must submit to Brent council. And fifth, they must commit to continuous improvement. BSAB will meet to discuss any incidents and lessons learned.

6.5. Resident Experience

6.5.1. In Autumn 2025, staff visited two properties in the borough currently providing non-commissioned supported exempt accommodation, mostly to residents fleeing domestic abuse/fear of violence and refugees with mental health needs. In addition, staff invited various residents currently residing in SEA to come into Brent Civic Centre to talk to their experience.

6.5.2. Overall, staff heard detailed and open testimony from three residents. 2 of 3 stated that they received no support at all in their current supported accommodation. Those residents had been residing in SEA for 5 years and 10 years respectively with two large providers. 1 stated that provision of a weekly support worker for a year, alongside a limited number of therapy sessions, 'changed my life'. That resident was able to move into independent

living alongside a career lecturing at a London university within one year. 1 resident was living in fear of violence and would benefit from being housed elsewhere, away from (alleged) use of drugs and alcohol and potentially in a women's only scheme.

6.5.3. Residents highlighted the kind of support they would benefit from:
- Structured weekly 1:1 sessions with a support worker
- Tailored benefits support
- Tailored employment support
- Support to find move-on / independent accommodation
- Group activities and opportunities to meet others and connect with community
- Psychological therapy

6.5.4. Many of these findings complement findings from engagement with residents receiving Housing Related Support Services, as outlined below.

6.6. **Financial Analysis**

6.6.1. The National Audit Office explains: "Local authorities pay Housing Benefit for specified supported housing, in most cases, directly to the provider. DWP reimburses local authorities for these payments in line with the Housing Benefit subsidy rules which are set out in legislation. In some cases, the rules mean that the amount of subsidy paid to the local authority may be restricted. If the housing provider is registered with the Regulator of Social Housing, DWP reimburses the full amount." For those cases where the housing provider is not registered, an independent rent officer determines how much the local authority can claim as rent, based on similar properties in the area. The local authority can reclaim 100% of the rent officer determination from DWP. Who pays for the amount above the rent officer determination depends on the vulnerability of the resident. The NAO explains: "If the resident is classed as 'vulnerable', the local authority can claim a further 60% of the amount above the rent officer determination. Therefore, local authorities experience a gap in subsidy from DWP of 40% above rent officer determination for particular vulnerable groups, and 100% above this determination, for other residents."

6.6.2. If the provider is a Registered Provider, the entire cost falls to the DWP. If the provider is not a Registered Provider, the cost is shared between the council and the DWP, with the DWP covering more if the resident has a vulnerability.

6.6.3. Subsidy loss related to SEA was highlighted as a significant problem in 24/25, during which year loss was £3.96m. Estimates suggested cost could increase as high as £5m in 2025/26 and nearly £6m in 2026/27. However, following

significant action from staff, in 2025/26 subsidy loss equalled £2.06m. This was achieved through a combination of interventions:

- An improved process for assessing cases, ensuring that the resident has genuine support needs and the provider is capable of meeting them. This has reduced the number of new entries.
- Identifying 'vulnerable residents' e.g. those in receipt of Personal Independence Payment (PIP), and therefore claiming a further 60% of costs from DWP (see above).
- Improved scrutiny of new providers. Bearing in mind national trends and concerns, officers have conducted significantly greater scrutiny of new providers approaching the council, especially Community Interest Companies (CICs), which are associated with concerns at the national level. By preventing unscrupulous providers entering the market, we have avoided the additional demand they can bring, including residents from outside of Brent.

6.6.4. The latest forecast suggests this will drop below £1.3m in 2026/27, significantly outperforming the cross-Departmental commitment to savings of £130,000 on top of a budget reduction to £1.81m.

6.6.5. Staff continue to work to embed this improvement sustainably and to go further. They will do this by:

- Working with providers to enable a partnership model, whereby support providers work in partnership with Registered Providers.
- Work in partnership with First Wave Housing to introduce a new supported exempt accommodation scheme which delivers cost reductions, improved quality and better value for money.

6.6.6. Overall, staff believe more can be done to improve value for money. That is why the council is working in partnership with First Wave Housing to launch a supported accommodation scheme. It is also why we will continue to work with providers to drive up quality, support good providers to expand, manage out poor providers where necessary, prepare for the new Supported Housing Regulatory Oversight Act and associated licensing scheme, and develop a new Local Supported Housing Strategy.

6.7. **Benchmarking**

6.7.1. It is challenging to benchmark for supported exempt accommodation. This is because local authorities do not have a statutory role to commission or deliver SEA, only to decide whether a provider may access a particular category of housing benefit. Consequently, this is not something that local authorities are required to report on nor that is published by MHCLG, Local Government

Inform, or other platforms. At the same time, most authorities do not wish to share the level of provision, and associated cost, in their borough.

6.7.2. Brent Council meets regularly with other local authorities to discuss approaches to supported exempt accommodation. This includes methods to reduce subsidy loss, the provider market and partnership arrangements. This includes engaging with sub-regional, regional and national groups working across Housing Benefits, Project Delivery, and Housing Needs and Support. The council has continuously implemented best practice and ideas generated from this engagement, and now often advises and supports other authorities. The Council even recently hosted a West London session on developing a Supported Housing Strategy.

7. Housing Related Support

7.1. Brent commissions accommodation and support for adults experiencing homelessness and ex-offenders, domestic abuse refuges, mental health support, and young people (18-24). They play a critical role in preventing homelessness, supporting vulnerable residents to live independently, and in reducing reliance on statutory interventions in health, housing and social care.

7.2. There are 379 units of housing related support services at present, in addition to a floating support service and a handyman and support service. The total value of these contracts is ~£3.25m.

7.3. Adult Social Care and Housing Needs and Support jointly commissioned a review of Housing Related Support Services by Bridges Outcomes Partnerships to evaluate the performance, relevance, and future direction of existing housing-related support services. The review found that while current services deliver substantial support to key population groups, including people experiencing homelessness, women fleeing domestic abuse, young people, and older adults, there are also several systemic challenges which undermine their effectiveness. These include a limited quantity of move-on accommodation, rigid eligibility criteria, a lack of integrated pathways, and minimal collaboration across sectors.

7.4. **Resident experience in Housing Related Support services:**

7.4.1. This section outlines findings from Bridges Outcomes Partnerships' review into housing related support services, who conducted in-depth, semi-structured interviews with service users to understand lived experience.

7.4.2. Many individuals value the support and dedication of frontline workers. However, people also report feelings of isolation, slow progress in their lives,

and limited support in preparing for life beyond the service. A lack of coordinated exit planning often leaves people unsure about what comes next. Key concerns include clarity about what to expect, how long they might stay, intended outcomes, and how they will be supported to progress. From the point of entry, clients are not always given clear information about what to expect from a service, including how long they might stay, what the intended outcomes are, or how the service will support them to progress toward stable housing and greater independence. While they received ad hoc support, this was not brought together to form a coherent pathway to independence. Further, this support could feel fragmented and lacked follow-up e.g. receiving CV-writing workshops but no further support for job applications, interview preparation, or sustaining employment. Other concerns were around slow timescales for void turnarounds and high levels of arrears, preventing move on. Move on accommodation continues to present a challenge in the current housing context, especially for mental health provision.

7.4.3. Overall, some people remain in services longer than necessary not because of needs but due to lack of options or practical move-on support. Nonetheless, many individuals described positive working relationships with support workers, citing kindness, reliability, and emotional support.

7.4.4. Brent Council is currently going out to tender for a design partner to support the Council to commission new outcomes-based contracts for these services.

8. The Wider Supported Housing System

8.1. **Supported Housing Board:** The Council has stood up a new Supported Housing Board to take a holistic, cross-council approach to supported housing, with a broad scope across all kinds of supported accommodation. This holistic approach will allow the Council to:

- Join up housing, adult social care, and children's provision of high, medium and low need supported accommodation
- Create a coherent overall supported housing ecosystem, minimising duplication and filling in gaps
- Better engage with providers across all forms of supported accommodation in a collaborative manner, and better coordinate market management
- Tackle shared system challenges e.g. voids, evictions, rent arrears, referral processes
- Better engage with residents and consider resident experience, improving residents' lives and helping residents to achieve independence where possible, with a particular focus on vulnerable groups such as residents with disabilities and residents who have experienced domestic abuse

- Achieve better value for money
- Implement the new supported housing licensing scheme, as mandated by MHCLG
- Develop and deliver the Local Supported Housing Strategy, as mandated by MHCLG

8.2. **Homelessness pressure valve:** The homelessness crisis has left more people in need of support before they are able to re-enter independent living. There are also more cases, and more complex cases, approaching Housing Needs who require support. For both, the supported housing system offers both a pressure valve and an opportunity for recovery and independence, and it will be important that the new strategy reflects the extent to which an increasing proportion of supported housing need is driven by the homelessness crisis – and the role it can play as a solution.

8.3. **Licensing scheme:** In Spring 2025, the Government consulted on the principles of introducing a new licensing scheme for supported accommodation, which the Council provided a thorough response to. Providers will only be able to claim the higher level of housing benefit that supported exempt accommodation offers if the scheme is licensed. The scheme will apply to most supported accommodation schemes and potential providers will need to meet the new National Supported Housing Standards and conditions related to the standard of accommodation, the suitability of the accommodation and support for the resident, and the provision of care, support and supervision. All licensees and scheme operators will also be required to pass a fit and proper person test.

8.4. This will provide the council significantly greater powers to regulate the provision of supported accommodation, which staff welcome. Council staff have prepared extensively for the introduction of the new licensing scheme, bringing together a multi-disciplinary group to learn about the existing market and identify the approach to standing up a new team.

8.5. The Government recently responded to its Consultation and is now consulting on draft DWP/MHCLG regulations. Officers are currently drafting a response to this Consultation.

8.6. **New approaches to supported housing**

8.6.1. The Council has been proactively exploring and identifying new approaches to supported housing that place resident experience, operational assurance and financial sustainability front and centre.

8.6.2. **First Wave Plus**: The Council has approved a scheme to work in partnership with First Wave Housing, who will launch a new supported accommodation scheme, 'First Wave Plus'. Its goal is to develop a model of supported housing that puts quality and value at the centre, while also being financially sound and sustainable. This scheme hopes to offer supported accommodation to over 300 residents within 2 years, including at least 150 new units. Officers are taking key legal documents to First Wave Housing's Board at the end of the month for a final decision and start the first phase of the new scheme. To this end, the Council has identified a set of properties owned by a Landlord that either the Council or First Wave Housing could enter into a long term partnership with to create best-in-class supported and/or temporary accommodation.

8.7. **Converting temporary accommodation to supported accommodation**:

8.7.1. Currently, Brent Council has a block booking arrangement with the Stayclub in Harlesden for 139 fully self-contained one-bedroom units of temporary accommodation. The block booking arrangement ends 31 January 2027 and officers are currently negotiating the future arrangements for this block.

8.7.2. In addition, all single residents owed a main housing duty (which comprises most residents in temporary accommodation) – many of whom are living in the Stayclub – are vulnerable. Many require support. At present, existing temporary accommodation arrangements are unable to provide that support, and officers supporting single households owed the main housing duty have roughly 300 cases each. Relatedly, there have been a small number of complaints regarding resident behaviour related to the 139 households (mostly single) living in the Stayclub. By introducing support at ~1:18 ratio, residents will be better supported and the Council hopes to improve resident behaviour, better support residents, and prevent complaints. Support is likely to include:

- a minimum of 2.5 hours per week support per residents
- structured weekly 1:1s
- support with accessing benefits and health appointments
- tenancy sustainment
- employment support
- supporting residents to attend community events,

8.7.3. In addition, by claiming a different form of housing benefit which is exempt from the Local Housing Allowance cap, this proposal would in fact allow the Council to make substantial cost reductions against the temporary accommodation budget, which is under exceptional pressure.

9. Supported Accommodation: New and Independent Living Scheme (NAIL)

9.1.1. The Supported Accommodation portfolio plays a key role in supporting vulnerable adults to live independently within the community whilst receiving the support required to maintain their accommodation and improve their wellbeing.

9.1.2. The New and Independent Living (NAIL) programme was established in 2014 to develop alternatives to residential care for vulnerable adult client groups across the borough. The programme supports Brent's wider objectives of promoting independence, improving resident outcomes and reducing reliance on higher-cost residential placements.

9.1.3. The housing management service works in partnership with Adult Social Care under a Service Level Agreement to deliver tenancy and property management functions across supported accommodation schemes. This partnership enables Housing Management, Adult Social Care, Commissioning, Brokerage and support providers to work together to deliver effective housing solutions for some of Brent's most vulnerable residents.

9.2. Breakdown of the Scheme

9.2.1. The portfolio is currently made up of 268 units across 27 schemes supporting a range of client's groups:

- Learning Disabilities
- Mental Health
- Extra Care
- Housing Related Support
- Other vulnerable adult cohorts

9.2.2. The accommodation ranges from self-contained flats through to larger communal schemes and purpose-built developments designed to support specific needs and client groups.

9.2.3. In recent years, the portfolio has expanded significantly through the development and mobilisation of new specialist accommodation schemes, including Extra Care provision at Emma Haas House and Honeypot Lane, alongside Supported Living schemes such as Clock Cottage. These developments have increased the borough's capacity to provide housing options for residents with a range of support and care needs whilst reducing reliance on more expensive residential care placements.

9.3. How is the Management Different than General Needs?

9.3.1. The tenancy management of the NAIL portfolio sits within the Specialist Accommodation Team, with Temporary and Supported Accommodation Officers responsible for managing both NAIL properties and Brent-owned Temporary Accommodation. Supported accommodation requires a significantly enhanced housing management approach compared with general needs housing due to the complexity and vulnerability of the resident groups being supported. Officers operate with smaller patch sizes than general needs Area Tenancy Managers, enabling them to provide a more intensive tenancy management service, undertake more frequent tenancy audit visits and communal area inspections, and spend more time working directly with residents to sustain tenancies and address issues at an early stage.

9.3.2. The team works closely with support providers, Adult Social Care, Commissioning and Brokerage teams through regular partnership working arrangements to coordinate support, manage risk and respond effectively to changing resident needs. Officers are also regularly present within larger schemes, helping to build strong working relationships with residents and on-site support providers. There is also an increased focus on safeguarding, vulnerability management and tenancy sustainment, supported by access to specialist systems and information where appropriate.

9.3.3. Whilst residents access the same repairs service as general needs tenants, the team plays an important role in ensuring repairs impacting vulnerable residents are appropriately escalated and prioritised where necessary. In addition, many residents within the NAIL portfolio are provided with furniture, flooring and white goods, with the service responsible for arranging ongoing repairs and maintenance of these items.

9.4. **Partnership Working**

9.4.1. One of the key strengths of the supported accommodation service is the close partnership working between Housing Management, Adult Social Care, Commissioning Teams, Brokerage Teams and Care and Support Providers. This collaborative approach enables the effective management of complex cases, improves safeguarding outcomes, supports tenancy sustainment, facilitates the coordinated mobilisation of new schemes, strengthens referral and allocation processes, develops effective move-on pathways and supports the management of voids and occupancy across the portfolio.

9.4.2. The service is currently working with Housing Needs, Adult Social Care and Commissioning colleagues to develop a Supported Housing Panel which will

provide a more coordinated approach to managing referrals and placements across the specialist accommodation pathway. The panel will help ensure referrals are appropriately screened and matched to accommodation, support more consistent decision-making and enable residents to move more effectively between different levels of support as their needs change. This includes supporting residents to step up from Housing Related Support into higher-needs accommodation where required, as well as facilitating move-on into more independent accommodation where appropriate.

9.4.3. Alongside this work, the service is strengthening joint working arrangements with the Housing Needs Department to identify homeless households, especially those in temporary accommodation, with care and support needs who may be suitable for Extra Care or other forms of supported accommodation. This will help ensure specialist accommodation is allocated to those most in need, improve utilisation of the supported housing portfolio, reduce void levels within newly mobilised schemes and ensure that applicants requiring both housing and care support are identified and matched to suitable accommodation at the earliest opportunity.

9.5. **Nail Performance Update**

9.5.1. The service has experienced significant growth during 2026/27, including the mobilisation of new schemes such as Emma Haas House. The expansion has increased the number of voids within the portfolio, especially for extra care schemes however performance data demonstrates positive trends across the KPIs with improvements in occupancy levels, income management, repairs and compliance.

9.5.2. **Voids and Lettings**

9.5.3. The mobilisation of new specialist accommodation schemes has had a significant impact on void performance during 2026/27. Void numbers peaked at 107 units in May and June before reducing to 70 units by October, representing a 35% improvement as new schemes have become established and occupancy levels have increased.

9.5.4. It is important to view void performance in the context of the service's recent growth. A significant proportion of reported voids relate to the mobilisation of new specialist accommodation schemes rather than traditional void management issues. Of the current voids, 19 relate to Emma Haas House, 16 relate to Wembley Park Drive, which is currently being mobilised, 2 relate to Clock Cottage, and 4 relate to Braemar Avenue, which is due to be mobilised in the new year. These schemes have significantly increased Brent's specialist accommodation offer but require referrals, assessments,

care package arrangements and support plans to be in place before occupation can occur.

9.5.5. Void figures are also impacted by a number of residents who have moved into accommodation but cannot yet formally hold a tenancy due to legal arrangements being required for individuals who lack capacity. Although these properties are currently reported as voids, they are occupied and housing management services are being actively delivered. The service is working closely with Adult Social Care and the Learning Disabilities Team to regularise these arrangements and ensure records accurately reflect occupation status.

9.5.6. Consequently, headline void figures overstate the number of genuinely vacant specialist accommodation units and should be considered alongside the mobilisation of new schemes and ongoing tenancy formalisation work.

9.5.7. **Void Rent Loss**

9.5.8. Void rent loss remains the service's most significant financial challenge and reflects the mobilisation of new accommodation, delays in specialist referrals and the time required to establish appropriate support arrangements for residents. Despite this, performance has improved considerably during the year, with void rent loss reducing to 58.5% by October 2026 as occupancy levels across newer schemes have increased. Further improvements are expected as Emma Haas House, Wembley Park Drive, Braemar Avenue and other recently mobilised schemes progress towards full occupancy.

9.5.9. **Income Collection**

9.5.10. Income collection performance has remained strong throughout the reporting period despite the challenges associated with mobilising new schemes, establishing Housing Benefit and Universal Credit claims for new residents and increasing occupancy across the specialist accommodation portfolio. Year-to-date rent collection stood at 100.5% by October 2026, demonstrating that the service is successfully maintaining rental income whilst supporting residents with often complex needs. This reflects close working between Housing Management, support providers and Adult Social Care colleagues to maximise income, resolve benefit issues at an early stage and sustain tenancies.

9.5.11. Performance has also been supported by improvements in arrears management, with current arrears reducing from 28.7% at the end of 2025/26 to 10.0% by October 2026. This reflects proactive tenancy management, early intervention and effective partnership working to support

residents in maintaining their tenancies and maximising entitlement to welfare benefits.

9.6. **Conclusion**

9.6.1. Supported accommodation continues to play a vital role in enabling vulnerable residents to live independently whilst reducing reliance on more costly residential care provision.

9.6.2. The service has successfully managed a period of significant growth and change, including the mobilisation of major new specialist accommodation schemes and the expansion of supported housing provision across the borough. Alongside this, there has been a significant increase in joint working across the supported accommodation portfolio, with Housing Management, Adult Social Care, Housing Needs and Commissioning teams working more closely together to ensure accommodation is being utilised effectively and matches identified need.

9.6.3. This has included the introduction of more structured operational meetings across services, supporting improved oversight of referrals, allocations, voids and pathway management. The service is also working with Housing Needs, Adult Social Care and Commissioning colleagues to develop a more coordinated approach to placements across the supported accommodation pathway, helping residents move between different levels of support as their needs change whilst ensuring specialist accommodation is allocated appropriately.

9.6.4. Partnership working has also enabled a review of existing accommodation and how it is being utilised. Following discussions with Adult Social Care, a scheme that was no longer suitable for use within the NAIL portfolio has been repurposed as temporary accommodation for survivors of domestic abuse, ensuring the asset continues to meet an identified area of need. In addition, the service is working with Housing Needs to identify homeless applicants whose care and support needs may make them suitable for Extra Care accommodation, helping to fill voids within newly mobilised schemes whilst ensuring applicants are matched to the most appropriate housing option.

9.6.5. Whilst void performance remains an area of focus, a significant proportion of reported voids relate to newly mobilised specialist accommodation and units awaiting tenancy formalisation. As schemes become established, referrals increase and outstanding legal arrangements are resolved, occupancy levels are expected to continue improving.

9.6.6. Overall, performance demonstrates positive progress, with void numbers reducing significantly during the year, rent collection remaining strong at 100.5%, current arrears reducing substantially and compliance performance maintained at 100%. The strengthened partnership approach across Housing Management, Housing Needs, Adult Social Care and Commissioning provides a strong foundation for the continued growth and development of Brent's supported accommodation offer, ensuring residents can access the right accommodation and support at the right time.

10. Stakeholder and ward member consultation and engagement

10.1. Officers have engaged with a number of stakeholders including internal Departments, external statutory partners, community organisations, and residents, as outlined in Section 5.5.

10.2. Officers have engaged with the relevant Cabinet member. They plan to engage with Housing Scrutiny on 24 November 2026 before engaging with Cabinet in early 2027.

11. Financial Considerations

11.1. In 2025/26, Brent received £88k of New Burdens Funding from MHCLG to support development of a Supported Housing Strategy, Needs Assessment and Delivery Plan. Further funding is expected for 2027/28 and 2028/29 to support the next phases.

11.2. Once the licensing scheme is live, the fee structure will be set to ensure that the income generated is sufficient to fund enforcement activity, property inspections, and proactive action against unlicensed or non-compliant landlords throughout the licence period. As the Council is not permitted to generate a surplus from selective licensing schemes, all income generated will be ring-fenced for purposes directly related to the operation and enforcement of the scheme.

11.3. Any additional funding required by Brent will be dependent on the finalisation of the strategy, delivery plan and confirmation of the Government’s published licensing regulations. At present, the Government has proposed that the Council can set fees equal to the cost of administering the licensing scheme.

11.4. Approximately one-third of supported housing properties are already subject to existing licensing frameworks. This provides the Council with an opportunity to undertake a detailed assessment of property conditions, which will directly inform the development and refinement of the wider strategy.

12. Legal Considerations

12.1. The Supported Housing (Regulatory Oversight) Act 2023 ("the Act")[3] places a mandatory duty on councils to prepare, publish and maintain a Local Supported Housing Strategy by 31 March 2027, informed by an assessment of current provision, unmet need and projected future demand over a five-year period.

12.2. The strategy must be developed in collaboration with social services authorities and relevant partners, embedding supported housing planning within wider housing, health and care frameworks. Failure to demonstrate effective partnership working or to align the strategy with broader statutory functions (including homelessness prevention, adult social care and safeguarding) may expose councils to legal challenge or criticism through inspection, audit or judicial review.

12.3. The Act strengthens councils' role in market oversight by linking strategic planning with forthcoming licensing and National Supported Housing Standards. Via the forthcoming licence scheme Councils will be responsible for issuing licences based on a provider's ability to meet new National Supported Housing Standards. This requirement introduces both the mechanisms and relevant powers for Councils to regulate both commissioned and non-commissioned providers, ensuring that all housing meets consistent standards. Although licensing regulations are expected to be commenced later, councils are legally required to use the strategy to inform future commissioning, enforcement priorities and engagement with both commissioned and non-commissioned providers. This creates an enhanced duty to ensure decisions are evidence-based, proportionate and consistent.

12.4. Strategies must be kept under review and updated at least every five years, with annual monitoring to MHCLG informing ministerial oversight.

13. Equity, Diversity & Inclusion (EDI) Considerations

13.1. The Public Sector Equality Duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

13.2. Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising

[3] Supported Housing (Regulatory Oversight) Act 2023

disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

13.3. Supported exempt accommodation is used to house residents with a wide array of needs, including:

- housing with care for older people
- people with a learning disability and/or autistic people
- people with mental ill health and/or physical disability
- young people leaving care or who are at risk of homelessness
- people experiencing or at risk of homelessness
- people with drug and alcohol dependency needs
- people with multiple complex needs
- domestic abuse refuges and safe accommodation with support

13.4. Supported housing is more likely to be accessed by residents who are from black, Asian, mixed or other ethnic backgrounds, who are disabled, and who are asylum-seekers.

13.5. Many of the residents living in supported housing are protected under the 9 protected characteristics laid out in the Equality Act, and these groups are more likely to experience health inequalities, social exclusion, and complex support needs.

14. Climate Change and Environmental Considerations

14.1. The actions and proposals herein do not impact on the Council's environmental objectives and climate emergency strategy.

15. Communication Considerations

15.1. Brent Council has published information about Specified Accommodation on its website, alongside the council's approach to assessing SEA claims. This information is available to all organisations or individuals providing or wishing to provide SEA in Brent.

15.2. In line with the Supported Housing (Regulatory Oversight) Act, once Brent Council receives clear implementation timelines from DWP and MHCLG for the new supported housing licensing scheme, it will develop an implementation plan and clearly communicate plans for a new licensing scheme clearly and in good time to any landlords or providers that may be impacted by the new licensing scheme.

Report sign off:

Tom Cattermole
Corporate Director of Residents and Housing Services