

Disability Rights UK Supported Housing consultation submission

Disability Rights UK (DR UK) is a pan disability membership organisation led by disabled people seeking change. Our membership includes individual disabled people and organisations working on their behalf including disabled people led organisations.

Among our membership are over three hundred organisations that give advice directly to disabled people, particularly in respect of benefit issues. DR UK run a second-tier advice line where we assist their front-line advice workers with supportive information and advice.

DR UK is responding to the October 2017 'Supported Housing Sheltered Extra Care' consultation proposals relating to supported housing for those with learning or physical disabilities or mental ill health.

A [2010 DWP report](#) suggested that around three in four of those living in supported accommodation were disabled people (25% had a learning disability, 42% had a physical disability, and 5% had a significant mental health problem).

This means that any change to the current supported housing funding model will most directly affect disabled people.

The November 2016 'Funding for Supported Housing' consultation proposed that rent and service charges be funded only up to the level of the applicable local housing allowance rate. Instead, funding would be given to local authorities in England to provide a 'top-up' to providers to reflect the higher costs of offering supported housing.

In [DR UK's response to the 2016 consultation](#) we strongly opposed its proposals as a move from a system that supports

disabled people's rights, entitlement and choice to a discretionary system.

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However, the October consultation is a very welcome reversal of the previous funding model proposed for supported housing for those with learning or physical disabilities or mental ill health.

We strongly support its proposal that 100% of housing costs will be funded through the current welfare system subject to the application of existing housing benefit/universal credit rules.

However, the consultation also says that –

“We will be working with the sector in England to develop and deliver an approach that will ensure greater cost control while driving up outcomes for vulnerable people. As part of this, we expect local authorities to begin developing an understanding of this provision in their areas now, and to think about ways to ensure better cost control.”

We acknowledge the important role that local authorities have in monitoring the cost and outcomes of supported housing provision.

But in considering cost control issues and service provision disabled people must also be widely consulted and their voice heard as any changes to this sector will most directly affect disabled people.

Ken Butler – 24 January 2018

This is in the context of continuing and increasing pressures on local authorities' finance that has already led to large reductions in services to disabled people.

In addition, it will be introduced at a time when many disabled people are likely to experience large falls in their benefit income.

These include the reduction in disabled people awarded Personal Independence Payment compared to Disability Living Allowance: the removal of the work related activity component from Employment Support Allowance; and the absence of the severe disability premium from Universal Credit.

It is essential that if disabled people are only to be awarded the LHA rate of Housing Benefit then their supported housing rental liability cannot be set by their landlord's at a higher rate.

As the LHA rate fluctuates so must supported housing tenant's legal rent liability fall or rise with it.

Not to do so would jeopardise the security that supported housing itself is meant to provide.

In addition, we are concerned that the consultation document does not specify -

- how long the ring-fence top-up support to local authorities will last;
- how those disabled people in areas where private sector rents are low are not disadvantaged by these changes and can still afford decent appropriate supported housing.

Also unspecified is how existing tenants will be protected in the transition from one system to another.

In order to have their rental help reduced to that of the LHA rate, existing residents will need to have their tenancy agreements emended so that their rent liability matches the LHA rate.

It is essential that there are no other changes to the level of service and support provided to disabled people when given a new tenancy agreement.

If there is to be a transfer of responsibilities to another it is essential that there is a clear requirement to capture the level of actual costs in the current supported housing system.

It is also essential that that funds are provided to meet commitments to current schemes.

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