



Coventry City Council Guide to **Standards for Supported Exempt Accommodation (SEA)**



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What is Supported Exempt Accommodation?

Supported Exempt Accommodation refers to properties in which the resident receives care, support or supervision for the purpose of enabling them to live or adjust to living independently within the community.

Specified accommodation categories.

● To be classified as 'Supported Exempt Accommodation':

- The landlord must be a voluntary organisation, a registered charity, CiC (community interest company) or Registered provider (Housing Association).
- The landlord must have a legal interest in the property concerned (ownership or lease).
- The residents must need 'care, support or supervision.'
- The 'support' to meet these needs must be provided by the landlord or on its behalf.

● To be classified as a 'Managed Property':

- The landlord must be a voluntary organisation, a registered charity or registered provider (Housing Association).
- The landlord must have a legal interest in the property concerned (ownership or lease).
- The resident must need 'care, support or supervision.'
- A third party provides the 'care, support or supervision.'

● To be classified as a Domestic Abuse Refuge:

- The landlord can be the same providers as above but can also be the local authority.
- The accommodation must be used wholly or mainly for non-permanent accommodation for people who have left their homes because of domestic abuse.
- There is no requirement that the resident receives care, support or supervision.

● To be classified as a Hostel:

- Hostel cannot be self-contained.
- Care, support or supervision must be provided (not necessarily by the landlord).

Who is this guide for?

This guide is intended for use by new and existing providers of Supported Exempt Accommodation operating within Coventry. It has been designed to help providers understand what is expected of them. This document does not set out a series of 'rules' or 'regulations' that providers are expected to rigidly follow. However, it does detail the local authority's expectations of providers operating in the city and will help to ensure value for money, quality and appropriateness of Supported Exempt Accommodation in the city.

The document has been produced through consultation with internal partners, statutory services and providers currently operating in the city. It is based on best practice, published guidance and housing legislation, and considers the anticipated requirements of The Supported Housing Regulatory Oversight Act 2023.

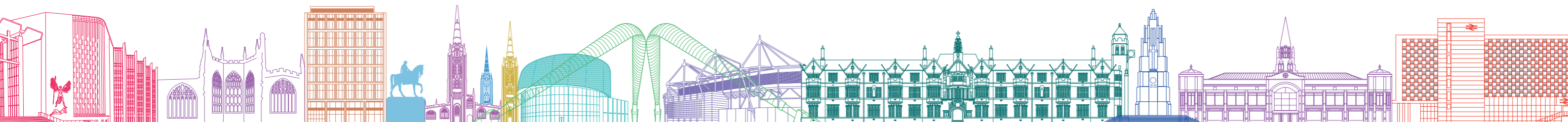
To be recognised by the local authority and its partners there will be an expectation that providers meet the standards laid out within the specification. Where they don't, advice and support will be given to help providers meet the required standards that the local authority expects.

It is acknowledged that there is no 'one size fits all', and that not all information within this guidance will be relevant to all organisations.

Similarly, you may feel that you are already aware of, or have implemented much of the following content. The guide is intended to help organisations consolidate, clarify, and build upon their existing practices. This will ensure that they are able to respond to their residents safely, effectively, and consistently, and identify clear linkages between management practices and resident experience.

NOTE

For new providers wishing to operate in the city it is recommended you familiarise yourself with the standards as part of the application (gateway) process – details around the gateway process and the Local Authority's approach to identification of housing need and gateway to become a provider can be found at www.coventry.gov.uk/SEA.



What does this guide include?

The guide to standards provides the detail and level of service expected to ensure that Supported Exempt Accommodation provision within Coventry meets local needs, is being delivered to a high standard, and represents value for money: based upon regulation, guidance, recognised good practice, and most importantly the views of supported residents.

Principles of the guide

Residents have fundamental, universal rights that should be respected and upheld. This includes access to basic amenities, a right to be treated with dignity and respect, and a right to live free from harassment, neglect, fear, or abuse.



Other rights include:

- Service provision should be consistent and fair, and within strong principles of anti-discrimination. This applies to both referral and access procedures and to housing management practices.
- In order to live well and progress, residents need to feel safe. Providers must apply their responsibilities around safeguarding and risk management stringently.
- Living environments should be secure, safe, well-managed and promote good health and wellbeing.
- Providers should conduct their business and their interactions with residents in a fair, open, and transparent way.
- Providers should display a keen willingness to continually adapt and improve their practice; learn constructively from their mistakes and promote shared learning within the sector.
- Exempt accommodation should be a 'stepping stone', for residents to progress with their lives and improve their housing situations. This applies to short term placements.
- Residents should be provided with opportunities and support to integrate into both their accommodation and their communities.
- Residents should have clear channels of communication with accommodation providers; be included in decisions that affect them and be regularly consulted about whether their housing or support is meeting their needs. This includes effective and clear mechanisms for complaints handling.
- Information should be provided to residents as and when needed, including upon request.
- Information should be clear, accessible, and in a variety of formats to cater for language and literacy needs.
- Residents' rights to privacy and confidentiality must always be respected and upheld including during 'one to one' or support sessions.
- Providers should work in the spirit of partnership, collaborating holistically with a range of agencies to enhance resident experience and ensure safety, wellbeing, and progression.
- The local authority expects provision to represent value for money.

Expectations

Coventry City Council will ensure new and existing providers of supported exempt accommodation have easy access to information, advice and guidance via internal partners and statutory services. This will include best practice forums and training.

All providers operating in the city will be audited by the Exempt Accommodation Team at least once each year to assess:

- The quality of support offered to residents along with the quality of the asset.
- Compliance of accommodation in line with standards required in Houses in Multiple Occupation (HMOs)
- Licencing and the Housing Health and Safety Rating System (HHSRS).
- Staffing structure and resources
- Property facilities
- Staff and resident feedback.
- Compliance checks against the quality specification (detailed below)

Findings from these audits will be used to assess value for money regarding housing benefit claims and compliance against specified costs and that accommodation is legitimately operating.

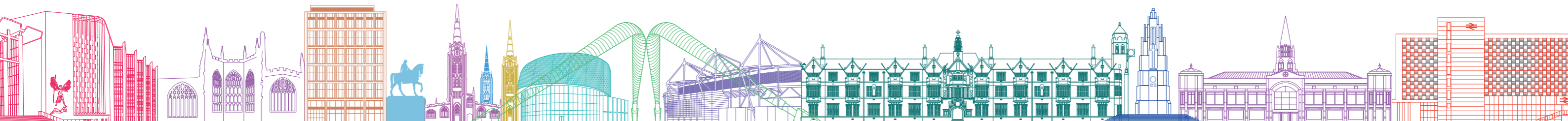


Value for money

- To determine the level of Housing Benefit that can be paid, it is considered.
- Are the charges eligible for Housing Benefit? To be eligible they must relate to the provision of adequate accommodation AND must be paid as a condition of occupation.
- Are the service charges / intensive housing management charges reasonable? Consideration will be given as to whether the charges are reasonable in:
- Is the core rent excessive compared to suitable alternative accommodation available which is cheaper? For accommodation to be comparable it must be similar in facilities and nature of accommodation.

Further information can be found www.coventry.gov.uk/sea

Where a provider is commissioned by the local authority or by another funding stream (NHS, ICB, CMHT etc) the Exempt Accommodation team will ensure that feedback is gathered from and shared back with, the relevant stakeholders in regard to the inspection process and outcomes.



Referrals and allocations

Appropriately and safely managing referrals and assessments for prospective residents can be a regular challenge for many providers. Residents are often also acutely aware that they do not feel they, or other residents, were appropriately assessed before being placed into a household, whether this is the case or not. Effective referral and assessment mechanisms can reduce risk, enhance resident and neighbourhood experiences, aid household stability, and reduce abandonments and evictions.

Referrals into exempt accommodation are not an 'exact science' and many providers will use a combination of existing protocols and professional intuition. It is also the case that not all issues or risks will be apparent during the referral and assessment process. However, there are several things providers can do to enhance their existing practices, and to ensure they are adequately prepared and equipped to prevent and swiftly detect issues that may arise once a resident has settled into their accommodation.

Providers will therefore be required to and audited to ensure:

Measure 1: The provider treats people with compassion, dignity, and respect.

Measure 2: The providers will have an agreed referral process and an adequate assessment procedure and rescues.

Measure 3: The provider ensures that individuals, their families, and carers have the information they need at times when they need it.



Measure 4: Providers will work with the individual and their supporting agencies to conduct thorough risk assessments to mitigate risk to service users and staff.

Measure 5: Prospective residents or their representative will be given the opportunity to meet with the provider face to face before signing for a property to allow the individual to make an informed decision.

Measure 6: Providers will only allocate rooms that are safe and fit to let. Move in dates will not be agreed until remedial works are completed, irrespective of pressure to fill voids.

Measure 7: Providers will work in line with GDPR legislation to ensure confidential information is treated sensitively.

Measure 8: Providers are encouraged to access Coventry City Council's Pre-Eviction Panel –the aim of this is to identify all individuals at risk of homelessness from commissioned and non-commissioned exempt accommodation within Coventry. The aim is to prevent homelessness and test appropriate support for individuals.

Safeguarding and risk management

Safeguarding

“Safeguarding means protecting an adult’s right to live in safety, free from abuse and neglect. Safeguarding involves people and organisations working together to stop abuse and neglect occurring and intervening effectively in situations if we do see abuse taking place.”

Principles of safeguarding

Empowerment:

People being supported and encouraged to make their own decisions and informed consent.

Prevention:

It is better to act before harm occurs.

Proportionality:

The least intrusive response appropriate to the risk presented.

Protection:

Support and representation for those in greatest need.

Accountability:

Accountability and transparency in safeguarding practice.

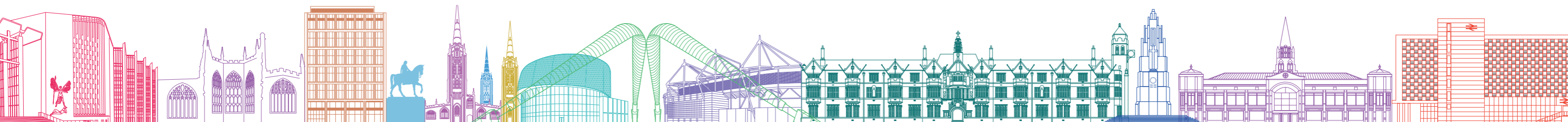
Partnership:

Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.



Providers and staff should understand and be committed to Adult Safeguarding protocols and responsibilities. Housing staff are well placed to detect signs of abuse or neglect, but must be aware of what to look for, how to approach concerns with residents, and where to report any concerns. All staff, including repairs staff and contractors, should be appropriately trained in Adult Safeguarding.

They should know how to spot the signs of abuse and neglect, know how to make and respond to safeguarding referrals, and how to manage risk positively and proactively. Residents should regularly be made aware that they have a right to live free from abuse, neglect or fear, and made aware that they can



Speak to a staff member or an external agency in confidence if they have any concerns. Residents should also be made aware of their responsibilities to each other, and that they must not behave in a way that causes harassment, fear, or harm. Organisations should ensure they comply with Coventry Safeguarding Adults processes. All safeguarding concerns, referrals and outcomes should be recorded and monitored, and organisations should be open to sharing learning and participating in any inquiries or reviews. It is important that organisations are aware that not all cases will meet the statutory 'threshold' for Adult Safeguarding. Organisations must have protocols and mechanisms in place to support and protect residents who are otherwise vulnerable to, or experiencing, forms of harassment and abuse. This includes ensuring staff have a good working knowledge of external forms of support, advice, and assistance. All staff should have a current Disclosure and Barring Service (DBS) certificate and be appropriately trained and skilled to work with vulnerable adults, and those with a range of support needs.

Providers will therefore be required to and audited to ensure:

Measure 9: Providers will appoint a safeguarding officer to protect vulnerable individuals from physical, mental, or emotional abuse.

Measure 10: The provider will be able to identify potential or actual harm, neglect and/or abuse (physical, emotional, or financial) relating to individuals being supported and has a robust procedure for addressing and reporting incidents.

Measure 11: Following cases of harm, neglect and/or abuse relating to individuals receiving support, the provider identifies any lessons learned and ensures that steps are taken to mitigate the risk of this happening again, liaising where appropriate with the authority.



Measure 12: Risk Assessments for individuals will continually be updated to reflect their changing circumstances. In circumstances whereby the safety of staff, other residents or themselves could be jeopardised, appropriate measures will be taken to relocate the individual.

Measure 13: Residents are encouraged to share their concerns or complaints without fear of discrimination, harassment, or disadvantage.

Support provisions

Support should be person centred and based on individual needs and delivered in a trauma and psychologically informed way. Some residents may take longer to regain the skills and confidence for independence and may require more ongoing intensive support over a longer period. Providers should assist residents to engage with a range of support agencies.

Support is structured to meet their needs, progress at their pace whilst ensuring they grow in confidence and competence to sustain independent living. Prolonging support creates dependency, disables people and traps them in the benefit system which prevents them from being able to access work, training etc.

Providers will therefore be required to and audited to ensure:

Measure 14: Providers will adopt a person-centred approach whereby individual, tailored support is offered based around choice.

Measure 15: Providers should develop an approach based on Trauma Informed Care and Psychologically Informed Environments

Measure 16: Trained Staff will assist the resident to create their support plans identifying goals they wish to achieve whilst residing in the accommodation. Goals should be SMART (Specific, Measurable, Achievable, Realistic and Timely)

Measure 17: The provider encourages residents to develop their life skills and build social support networks to live independently considering how volunteer sector assets may be used.

Measure 18: The provider proactively works with other agencies to ensure the holistic wellbeing of everyone

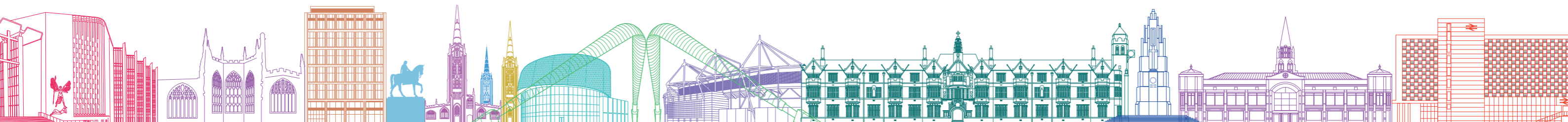
being supported, actively seeking to obtain knowledge on best practice and deploying that in practice.

Measure 19: Providers should make support accessible to all and encourage engagement.

Measure 20: Providers are encouraged to access Coventry City Council's Vulnerable Persons and Complex Needs Forum. A referral can be made to the forum if a resident is at risk of homelessness or of rough sleeping and have complex needs.

Measure 21: Providers will keep staff changes to a minimum to ensure continuity of support, limit use of agency staff and create a good rapport between the resident and their support worker.

Measure 22: The provider ensures that residents and families/carers are aware of the process of raising any concerns regarding the support received.



Tackling anti-social behaviour

Everyone has the right to feel safe and secure within their home. This is a basic, natural entitlement we all have, and which many of us take for granted. Some residents may only be with an accommodation provider for a brief period of time, and the majority of exempt accommodation is in some way 'temporary' or 'transitional'. Nonetheless, residents have every right to feel 'at home' within their surroundings. This includes feeling free from harassment, harm, or abuse.

This relates to residents of Support Exempt Accommodation, their immediate neighbours and wider community.

Providers will therefore be required to and audited to ensure:

Measure 23: Providers and their staff will have good relationships with local police and fire departments, resident's associations and neighbouring properties.

Measure 24: Residents are empowered and supported to engage with neighbours and the local community if they choose.

Measure 25: Providers will have an up-to-date policy for dealing with anti-social behaviour.

Health and safety

The local authority's objectives through its Private Sector Housing Enforcement Policy are to improve the quality, choice and standards in housing, improving the quality of the street scene and improving residents' satisfaction with their neighbourhood as a place to live.

It goes further in that the aim of the policy is to reduce the risks to health and safety of persons living in, and visitors to their homes. The local authority will use all available legislation to ensure that supported accommodation within the city of Coventry is safe, well managed, maintained in good repair, not overcrowded and does not pose a statutory nuisance.

Providers will therefore be required to and audited to ensure:

Measure 26: Accommodation is safe and well maintained in line with Sections 9a – 11 of the Landlord and Tenant Act 1984. Landlords must ensure all areas within the accommodation is fit for habitation and free from hazards which pose risk to occupier's health or safety, in line with the Housing Health and Safety Rating System (HHSRS).

Measure 27: Properties are appropriate size for the number of occupiers in line with the Housing Act 1985 and Housing Act 2004.

Measure 28: The building must comply with the local authority's standards or other statutory building and fire safety regulations.



Measure 29: The provider will:

- A.** Check and maintain gas safety.
- B.** Fit smoke and carbon monoxide detectors.
- C.** Provide an Energy Performance Certificate (EPC).
- D.** Obtain Electrical Installation Condition Report (EICR).
- E.** Provide a copy of the "How to Rent: The checklist for renting in England" to all residents.

Measure 30: The building has an appropriate and up to date fire risk assessment and where appropriate has been inspected by the West Midlands Fire Service.

Measure 31: The provider in line with best practice has relevant and up to date policies and procedures in place for risks associated with Asbestos and Legionella.

Measure 32: Providers will comply with management duties and licensing standards in relation to Houses in Multiple Occupation (HMOs) even where the property is formally exempt from licensing under schedule 14 of the Housing Act 2004.

Measure 33: Providers make reasonable adjustments within the accommodation to meet resident's needs. For example, if a resident is disabled (Equality Act 2010).

Measure 34: Providers will conduct regular property inspections to ensure they are adhering to the Housing Health and Safety Rating System (HHSRS) and the property is free from any hazards.

Measure 35: It will be clear to residents who is responsible for repairs and maintenance. They will be provided with information regarding the process of how to report repairs.



Adequate resources

Exempt accommodation is paid for by enhanced housing benefit. It is therefore crucial that providers ensure adequate resources in terms of staffing, and property facilities. For example, a sufficient number of bins for property size, adequate staffing ratios against portfolio size, appropriate fixtures and fittings to meet the needs of the client group.

Providers will therefore be required to and audited to ensure:

Measure 36: Organisations must have a clear staff structure with assigned support staff who have their own caseload and are known to the residents.

Measure 37: Staff to resident ratio will meet the minimum level of 3 hours support for Housing Benefit Purposes.

Measure 38: Residents will have access to an emergency out of hours contact who is a representative of the organisation.

Measure 39: Residents should be provided with adequate facilities to dispose of waste and details of refuse collection timetables.

Measure 40: When acquiring new properties, consideration will be given to suitable property size and locality, ensuring a fair distribution of exempt accommodation across the city in line with planned introduction of The Article 4 Direction.

Measure 41: Providers will provide a bed and adequate storage for residents' belongings. Furnishings provided will be fit for purpose and meet The Furniture and Furnishings (Fire) (Safety) Regulations 1988.

Appropriately skilled and resourced workforce

Staff are an organisation's greatest asset and resource. Therefore, providers need to ensure their staff are adequately skilled, supported and enabled to conduct their roles effectively. Staff working with vulnerable people should be clear about their role, function, responsibilities, and limitations.

Providers will therefore be required to and audited to ensure:

Measure 42: Staff inductions, handbooks and access to policies and procedures are provided to all new members of staff.



Measure 43: Each member of staff will have an individual training plan specific to their role and the clientele group they support. Staff should be supported to acquire appropriate qualifications if not already appropriately qualified.

Measure 44: The provider actively works in partnership with services in the city to share, understand and deploy best practices.

Measure 45: Providers are encouraged to access Coventry City Council's Stakeholder Planner, offering advice and support from partner agencies.

Measure 46: The provider actively seeks and can demonstrate that it has listened to the views of its staff regarding the provisions that staff need to undertake their role. The provider will take the necessary action to ensure that staff can competently undertake their roles.

Measure 47: Providers listen to the views and experiences of staff and residents without penalties and use them to shape the service and its culture.

Measure 48: Staff will have regular one-to-ones to discuss training, development and wellbeing.

Measure 49: Providers will regularly review their policies and procedures ensuring they remain relevant and in line with the culture of the organisation. All staff will have access to this information.

Policies that will be checked as part of the audit process:

- Referral and Assessment Procedures
- Safeguarding Vulnerable Adults
- Domestic Abuse and Sexual Violence
- Equality and Diversity
- Whistleblowing policies
- Substance Misuse
- Antisocial Behaviour
- Equality and Diversity
- Lone Working
- Confidentiality and Data Handling (GDPR)

The outcomes of the audits will be shared back to the provider and used internally as part of our strategic approach to ensuring quality, appropriateness and value for money for exempt accommodation within the city. Where areas of improvement are identified as part of the process, improvement plans will be developed in partnership and support and guidance will be provided by the team.

