



DEFINING SPECIFIED ACCOMMODATION FOR HOUSING BENEFIT PURPOSES

Guidance for landlords and housing benefit teams

Updated with new introduction, June 2017

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INTRODUCTION TO RE-ISSUE WHY SPECIFIED ACCOMMODATION CONTINUES TO BE SIGNIFICANT

This Guidance was originally published in January 2015, since when there have been many changes in welfare policy in the UK. The time feels right to reissue the Guidance to set Specified Accommodation within this changing context and to raise its profile. Specified Accommodation remains as important now as it did when this Guidance was published over two years ago.

Specified Accommodation is currently exempt from some of the most significant elements of welfare reform. Dependent on the type of Specified Accommodation, claimants may be exempt from the bedroom tax, or under occupancy charge. Also, the benefits cap does not apply to Specified Accommodation and this is increasingly significant as the benefits cap has now been reduced to £20,000 for a family with children, £13,400 for a single person, annually, outside London. In addition, the housing costs of Specified Accommodation should not be dealt with through the Universal Credit system but should continue to be dealt with through the Housing Benefit system. Finally, the housing cost element of Universal Credit (UC) claimants living in Specified Accommodation should not automatically be paid to the individual but can be paid direct to the landlord.

The fact that housing costs in Specified Accommodation should continue to be dealt with through the Housing Benefit system is particularly important for claimants aged 18 – 21 who are no longer eligible for housing costs through UC. The Scottish Government have stated they will continue to fund the housing costs of 18 – 21 year olds on an interim basis through the Scottish Welfare Fund but for those in supported housing it will be more straightforward to simply claim HB.

The definition of Specified Accommodation and the exemptions associated with it are set to remain in place until April 2019 at least.

Tenants living in Specified Accommodation may face higher rent and service charge levels because of the housing related services provided. It is therefore very important that they receive adequate financial support through the

benefits system when they need it to in order to avoid rent arrears and the risk of homelessness.

To help ensure that benefit claims are dealt with appropriately landlords must have an understanding about Specified Accommodation criteria and whether or not their services meet them.

The UK Government undertook research between 2014 – 16 about the nature, extent and cost of supported housing¹. One of the findings was that a much lower percentage of supported housing in Scotland is classified as Specified Accommodation than in England (22% as opposed to 44%). There are various reasons for this disparity including a possibility that some supported housing is not being treated as Specified Accommodation in Scotland when it could be.

The Department for Work and Pensions (DWP) have over the past few years made it clear that their preference would be to transfer the higher level of benefit funding associated with supported housing, including Specified Accommodation, out of Housing Benefit/Universal Credit to local authorities in England and to the Scottish Government. In the Autumn Statement in 2015 the Chancellor announced that the Local Housing Allowance (LHA) will be used to cap claims from tenants in the social rented sector in the future, including those living in social rented supported accommodation. It is anticipated that the UK Government will transfer an amount of funding out of the benefit system to the Scottish Government to help to fund the shortfall between supported accommodation rents/ service charges and the LHA cap. The timescale for this is currently 2019.

It is important that supported housing is classified as Specified Accommodation where it meets the criteria for the reasons highlighted above and to promote accurate assessments about the funding contribution that the benefits system currently makes to supported housing in Scotland.

¹ Supported Accommodation Review, The scale, scope and cost of the supported housing sector. November 2016, DWP and DCLG.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/572454/rr927-supported-accommodation-review.pdf

ACHIEVING CONSISTENCY IN DECISION-MAKING

The original premise for publishing the Guidance remains. Providers of supported accommodation report that there is inconsistency of decision-making across Scotland's local authority benefit teams. Apparently identical Specified Accommodation claims are rejected in one authority whilst being approved in another, so it is important for providers that there is consistency in decision-making across local authority benefit teams.

It is important that providers of Specified Accommodation remain alert to the importance of ensuring their tenants claim housing benefit for assistance with their housing costs. Housing support workers have a role in helping to ensure that tenants are aware that, depending on their circumstances, they should apply for housing benefit and that this is a separate process from applying for Universal Credit.

The recommendation of the original Guidance was that benefit teams should develop a register of Specified Accommodation that they can share with providers to ensure that all concerned are agreed on what is and what isn't Specified Accommodation. It is apparent that some local authority teams have made excellent progress in developing such registers, whilst there is still progress to be achieved in some other local authorities. This principle, of developing and maintaining a register, will be of ever greater significance as Full UC is rolled out and increasing numbers of people in supported housing apply for UC.

The DWP liaises with local authorities to confirm that a person is living in Specified Accommodation so that their housing related costs can be dealt with through HB. The details of how this is clarified by DWP are not entirely fixed currently. At the time of completing their online registration, the UC claimant is asked if they live in supported accommodation. If they state that they do not live in supported accommodation, a Social Rented Sector (SRS) form is issued by the DWP to the landlord. This provides the opportunity for the landlord to state that the property is Specified Accommodation and therefore that housing benefit should continue to be paid.

If a person in receipt of housing benefit registers for UC, the DWP issue a 'stop notice' to the Housing Benefit Team. If the claimant lives in specified accommodation and the housing benefit should not be stopped, this provides the local authority with the opportunity to inform DWP of this.

IMPACTS ON HEALTH AND SOCIAL CARE OUTCOMES

Since January 2015, health and social care integration has become a reality. Integrated Joint Boards (IJB) took responsibility for health and social care adult services from April, 2016. A key element of providing integrated health and social care services is the supply and management of supported accommodation. Whether supported accommodation is Specified or not potentially makes a big difference to income streams to individuals and to providers of supported accommodation. Threats to income streams have a major bearing on current and future supply. There is already evidence of providers wisely repositioning supported accommodation services in order to position themselves strategically relative to the changing regulations. There is some evidence of planned developments being put on hold as a result of the plans to introduce the LHA cap to supported housing.

IJB's need to be aware of the impact of these rule and practice changes in order to predict likely future supply relative to an ever-increasing demand for supported housing. Local authorities should be demonstrating the contribution that housing can make to meeting shared health and social care outcomes through their Housing Contribution Statements, but as provision and especially new development plans shift in light of changes to welfare regulations, these HCS's will require substantial revision and will become increasingly inaccurate guides to future supply.

THE FUTURE OF SPECIFIED ACCOMMODATION

Although lobbying continues, and the future is far from certain, under current regulations, from April 2019, all tenancies, those in supported accommodation and those not in supported accommodation, will be eligible for housing benefit up to a maximum amount set according to the Local Housing Allowance, and Shared Accommodation Rate for under 35's. The Specified Accommodation regulations will no longer apply. However, for the next two years, until April

2019, the Specified Accommodation regulations will continue to be very important for claimants, for providers of supported housing, for Integrated Joint Boards and ultimately, for the entire sector as it is decided how big the supported housing sector 'pot' is and how much funding will need to be transferred to Scottish Government/local authorities in order to continue its funding that meets current and predicted future levels of demand. For all these reasons, it is essential that local authority benefit teams and DWP continue to heed the Specified Accommodation Guidance.

June 2017

INTRODUCTION

The UK government has embarked on a programme of welfare reforms which will see the introduction of a new state benefit for claimants of working age, Universal Credit. This new credit, which will replace Income Support, Jobseekers Allowance and the Employment and Support Allowance, will include a housing cost element which will replace Housing Benefit.

As part of this programme of change, ministers have indicated that help with housing costs for claimants who live in certain supported accommodation should not be part of that national Universal Credit but instead be provided more locally. DWP are currently considering how such a localised funding scheme would be administered and funded.

In addition to these fundamental reforms to welfare benefit provision, the Government has introduced a series of changes designed to slow down the rate of increase and eventually reduce expenditure on Housing Benefit. In April 2013 two major changes were introduced, the Benefit Cap and a 'spare room subsidy restriction' (bedroom tax) for social sector tenants of working age.

The Government subsequently recognised that their welfare reform provisions, such as the benefits cap and bedroom tax, were causing 'unintended consequences' for housing benefit claimants who live in supported accommodation. The Government has amended HB legislation in order to clarify which types of supported accommodation should be exempt from welfare reform provisions in order to negate these unintended consequences. The original categorisation of supported accommodation to which these new exemption rules applied was known as Supported Exempt Accommodation (SEA). This category was later broadened by the recognition of further categories which are now collectively known as Specified Accommodation.

Given the protection available to residents of this extended category of accommodation, it is important that all Specified Accommodation, including Supported Exempt Accommodation, is identified to ensure that benefit claimants residing in such accommodation receive their full benefit entitlements and continue to have their housing costs covered by Housing Benefit.

Providers of supported housing have reported inconsistencies in how these definitions are applied by local authority benefits and legal teams across Scotland. Scotland's Housing Network (SHN) agreed to develop guidance on the application of the Specified Accommodation regulations in practice that could be agreed by benefits practitioners and the providers of supported accommodation.

This guidance has been developed in conjunction with members of the SHN *Homelessness and Housing Support Forum* and members of the *Institute of Revenues, Rating and Valuation Scotland*. The guidance was developed in consultation with members of the Temporary and Supported Accommodation Sub-Group of the Scottish Government's Housing Benefit Stakeholder Advisory Group. The TA/SA Sub-Group is attended by representatives of Scottish Government and Scottish local authorities, as well as representatives of:

- ALACHO
- COSLA
- Homeless Action Scotland
- the Housing Support Enabling Unit
- Scottish Women's Aid
- SFHA
- SHN
- Shelter Scotland

SHN is grateful to all those who helped to produce this guide.

BACKGROUND

Supported housing is a term which has been used to describe a range of accommodation based support services including hostels for homeless people, group homes, sheltered housing for older people, women's refuges and long term supported housing for people with learning disabilities or physical disabilities. Supported housing may be temporary or more permanent and typically involves some sort of occupancy agreement. Supported housing may be managed by the landlord of the property or may be managed on their behalf by a voluntary agency providing the support.

Supported housing is very important in assisting some of the most vulnerable people in communities around Scotland to maintain a roof over their heads and achieve as much independence in their lives as possible, for instance homeless people, women fleeing domestic violence, older people in sheltered housing, disabled people and people with mental health problems. Supported housing also plays an important role in preventing demand for additional services.

The benefits system plays an important role in making supported housing affordable for claimants with no or limited income. Since 2003 the system does not contribute to the cost of actual support (e.g., the costs associated with housing support staff) but does continue to pay for the additional costs associated with the bricks and mortar of supported housing (e.g., security systems, additional maintenance costs, communal areas).

SUPPORTED EXEMPT ACCOMMODATION (SEA)

Supported Exempt Accommodation is not a new concept. Previously known in the Housing Benefit legislation as just 'exempt accommodation', it serves a number of important purposes:

- it helps ensure that vulnerable residents, particularly older people, sick or disabled and claimants with children, are not automatically limited to a level of housing benefit as restricted by the Rent Officer or by Local Housing Allowance levels whereby they might need to move to alternative accommodation;

- it helps facilitate a preferential rate of subsidy/reimbursement from DWP to the local authority in respect of the Housing Benefit paid out for such category of claims, and
- under the recent changes, it has provided exemption from both the Benefit Cap and the bedroom tax as well as protection from any migration of the housing costs to Universal Credit.

SPECIFIED ACCOMMODATION

The Housing Benefit and Universal Credit (Supported Accommodation) (Amendment) Regulations 2014 build on the exempt accommodation definitions, defining three new categories of supported accommodation, to add to the existing supported exempt accommodation, that are protected from some of the changes and cuts in welfare benefit provision. The new broader classification, known collectively as Specified Accommodation, has four categories as shown in the table below.

Table 1 Categories of Specified Accommodation

	1. Supported Exempt Accommodation	2. Managed Properties	3. Refuges (not meeting SEA criteria)	4. Hostels (shared accommodation)
Exempt from weekly benefit cap?	✓	✓	✓	✓
Exempt from bedroom tax?	✓	x	x	x
Housing Benefit paid direct to landlord?	✓	✓	✓	✓

Under Housing Benefit regulations, SEA is exempt from the benefit cap which restricts total weekly benefit payments to £500 for a couple and £350 for a single claimant. SEA is also exempt from the bedroom tax. The other types of Specified Accommodation, i.e. Managed Properties, Refuges and Hostels are exempt from the benefit cap, but are NOT exempt from bedroom tax.

Under Universal Credit regulations, housing benefit for all types of Specified Accommodation continues to be paid directly to the landlord, not to the claimant through Universal Credit. The DWP have also said that it is highly likely that in any event housing costs for claimants in supported accommodation will continue to be

paid to the landlord (*Universal Credit: Guidance on personal budgeting support*, DWP, 2013).

Supported accommodation which is **not** considered to be a type of Specified Accommodation is subject to the benefit cap of £500 or £350 per week.

It is important to note that the three new categories (Managed Accommodation, Refuges and Hostels) do not attract any preferential rate of HB subsidy, which remains only available for Supported Exempt Accommodation.

NB None of the above categories of Specified Accommodation provide exemption from the effects of welfare reform to claimants in receipt of floating support living in mainstream accommodation.

THE IDENTIFICATION OF SPECIFIED ACCOMMODATION

How is accommodation initially identified by the HB practitioner or by DWP for UC purposes, that a claimant is living in a dwelling that is, or may be, Specified? This is the key question facing landlords. Listed below are the key steps landlords should undertake to effectively manage the process.

Creating a Register of Specified Accommodation

Some local authority HB teams, particularly those with responsibility for larger population areas, maintain, or are developing, registers of what may be classified as Specified Accommodation. Receiving a claim from one of these addresses would flag to the HB team that this was potentially Specified Accommodation.

It is recommended that all HB teams should work with providers to establish and maintain a register of specified accommodation within their respective local authority area. This process should result in a precise understanding of what accommodation is being provided within the four categories: SEA, Managed Properties, Refuges and Hostels. This register should be reviewed regularly, and should be made accessible to providers of supported accommodation in order that they can check that accommodation that they considered should be treated as Specified is indeed appropriately included on the register.

Adding Properties to the Register

Claims from new properties or properties being used for the first time as supported accommodation would not necessarily be noted as potential Specified Accommodation by HB teams. The HB team would expect that the landlord would inform them that the property was potentially likely to be categorised as Specified Accommodation. It is therefore important that providers of supported accommodation do contact their HB teams at the earliest opportunity when developing new provision or classifying existing accommodation as supported. When developing project cost schedules and discussing them with HB practitioners, it is important that they make clear the provision of care, support or supervision.

If a claim is received from an address that is not already known to be Specified Accommodation, nor to potentially fall into a Specified Accommodation category, the rent level itself is likely to provide an indication to the HB team that the accommodation is supported with a proportion of the rent paying for care, support or supervision. However, this approach should not be relied upon and the only reliable practice is to develop and maintain close working relationships between HB teams and supported accommodation providers, as outlined above.

THE KEY DEFINITIONS THAT DETERMINE SPECIFIED ACCOMMODATION

The four categories of Specified Accommodation, as set out in table 2, are primarily defined relative to:

- the landlord
- the provider of care, support and supervision.

See the flowchart at page 16.

Table 2 Categories by Provider

	Landlord	Care, Support or Supervision
1. Supported Exempt Accommodation	Housing association, charity or voluntary organisation	Provided by or on behalf of the landlord
2. Managed Properties	Housing association, charity or voluntary organisation	Provided by anyone and not necessarily by or on behalf of the landlord
3. Refuges <i>(not meeting SEA criteria)</i>	Housing association, charity, voluntary organisation <i>or local authority</i>	No care, support or supervision requirement

4. Hostels <i>(shared accommodation)</i>	Housing association, charity, voluntary organisation <i>or local</i> <i>authority</i>	Provided by anyone and not necessarily by or on behalf of the landlord
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Definition: ‘Landlord’

In all circumstances, the landlord is that organisation that the tenant would consider to be the landlord, the body to whom the tenant is liable for paying the rent, the organisation with whom the tenant signs the tenancy or occupancy agreement.

In situations in which there may be any ambiguity about who the landlord may be, for example when property leasing arrangements exist between local authorities, housing associations, voluntary organisations, etc., it is extremely important that leasing agreements are worded appropriately in order to make the nature of the relationship absolutely clear and especially who the landlord of the property is. The lease agreement is useful evidence for the HB team in deciding a claim and equally importantly, can support a robust audit trail demonstrating how a decision was arrived at. Providers of supported accommodation are advised to review such leasing arrangements in light of the welfare reform changes.

The landlord of SEA and Managed Properties must be a housing association, charity or voluntary organisation, NOT a local authority or private sector organisation. The accommodation provider of Refuges and Hostels must be a housing association, charity, voluntary organisation OR local authority.

County councils do not exist in Scotland and all references to county councils in the SEA regulations are entirely irrelevant in Scotland.

Definition: ‘Care, Support or Supervision’

In all types of Specified Accommodation, other than Refuges, there must be provision of care, support or supervision. This is care, support or supervision for the person not the property. Housing support is subject to inspection by the Care Inspectorate (www.careinspectorate.com); HB practitioners may have reference to Care Inspectorate reports to determine whether regulated housing support is indeed being provided at a given address.

The provision of care, support or supervision must be more than a minimal amount. ‘The care, support or supervision must not be a trifling amount – it must make a difference to the claimant’s ability to maintain the tenancy’, Bristol City Council v

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AW [2009]. The support is more than that which is normally provided by the landlord. It is support to facilitate the everyday practicalities of living and that may be specific to the needs of the individual. For example, a refugee, a tenant who has been sleeping rough or someone with alcohol addiction issues would present quite different and specific support needs (guidance helpfully expanded in the Upper Tribunal case CSH/250/2014 concerning the provision of support exempt accommodation by Stirling University).

The fact that the claimant has been assessed as being in need of, and has been admitted to supported housing in order to receive, care, support or supervision is sufficient for that accommodation to be considered exempt.

‘The admission process should include the need for care, support or supervision being identified by someone that...is in a position to undertake it,...a professional or someone with experience in the care/support sector’.

The claimant must actually be taking advantage of the care, support or provision or be likely to do so. In theory, this means that accommodation could be exempt one day and not the next, or that neighbouring units in the same supported housing could have different categorisations in terms of HB, dependent on the claimant’s willingness to take advantage of, or their need of, the care, support or supervision provided.

In practice, however... it is unlikely that a HB team would become aware if a claimant was not engaging with support services or was not in need of these services. In practice, the HB officer would in all likelihood take the claimant’s admittance into the SEA, Managed Property or Hostel as evidence that they were in need of, and were in receipt of, that care, support or supervision. Therefore, the most significant determinant as to whether a HB claim would be considered exempt or not is the categorisation of the property as a relevant category of Specified Accommodation, as opposed to the circumstances of the individual claimant.

There is a range of evidence that an HB practitioner may draw upon to assure themselves that care, support or supervision was being delivered within the terms of the regulations:

- most commonly, HB practitioners would expect to see the costs of any care, support or supervision specified in a breakdown of project costs (this is to check that the accommodation is ‘supported’, rather than establishing which charges are eligible and not eligible for HB subsidy);

- similarly, the annual rent increase notice might be expected to include a breakdown of costs including care, support and supervision charges (again, in order to check that the accommodation is ‘supported’, rather than checking those costs that are eligible for HB subsidy);
- where relevant, management agreements between the landlord and the care, support or supervision provider could be requested;
- HB practitioners might conduct visits to supported accommodation, although reference to Care Inspectorate reports may be a more effective and more efficient means of verifying the details of support provision, and/or
- they may ask to see the job descriptions of staff engaged in the delivery of care, support or supervision.

Again, all such material would be as much to support the decision-making process for audit purposes as much as the decision-making itself.

Definition: Care, Support or Supervision Provision ‘on behalf of’ the Landlord

In SEA, care, support or supervision must be being provided by the landlord or someone acting on their behalf. In Managed Property or Hostels, it is not necessary that the care, support or supervision is provided by or on behalf of the landlord.

The main evidence that the HB practitioner would accept when making decisions as to whether care, support or supervision was being provided on behalf of the landlord would be the existence of management agreements between the landlord and the care, support or supervision provider. Therefore, it is essential for landlords to ensure that these statements reflect the accurate position in terms of what care, support or supervision is provided and whether that provision is on behalf of the landlord or not.

Definition: ‘Refuge’

The Regulations define a Refuge as property that is used wholly or mainly for the accommodation of people who are fleeing domestic abuse. Within the terms of the Regulations, there is no requirement for care, support or supervision to be provided in Refuges, although in practice, refuges in Scotland do all involve the provision of

care, support or supervision. Therefore, in Scotland, as care, support or supervision is provided, refuges will meet the SEA or Managed Properties criteria where the landlord is a housing association, charity or voluntary sector organisation or, if a local authority is the landlord, the Refuge criteria.

The Scottish Government defines domestic abuse as:

‘gender based violence [that] can be perpetrated by partners or ex partners and can include physical abuse (assault and physical attack involving a range of behaviour), sexual abuse (acts which degrade and humiliate women and are perpetrated against their will, including rape) and mental and emotional abuse (such as threats, verbal abuse, racial abuse, withholding money and other types of controlling behaviour such as isolation from family and friends.’

Note that the UK Government definition of domestic abuse, which is the one relevant to the Specified Accommodation regulations, applies to abuse in any domestic setting, partnership, other family relationship, neighbour violence or within a landlord/tenant relationship. This definition of domestic abuse includes: ‘any incident, or pattern of incidents, of controlling behaviour, coercive behaviour, violence or abuse... regardless of the gender or sexuality of the victim.’

The claimant must be fleeing domestic abuse. Again the HB practitioner is likely to accept the claimant’s admittance into a refuge as sufficient evidence that that person is fleeing domestic abuse. If in any doubt, the HB manager could request a statement to this effect from the landlord, again, as much for audit purposes as for anything else.

Definition: ‘Hostel’

Hostels are as defined in the HB Regulations 2006 2(1):

‘a building in which there is provided...domestic accommodation, otherwise than in separate and self-contained premises, and either board or facilities for the preparation of food’.

Thus, hostel accommodation is not self-contained. ‘Accommodation is self-contained if the claimant’s household is not required to share one or more of the following with another household:

- kitchen;
- bathroom, or

- toilet (HB/CTB Circular S1/2011 Appendix A [7]).

This does create challenges as providers have moved away from non-self contained units even within prescribed hostel accommodation in order to provide a better standard of accommodation for homeless applicants. This shift in provision may now cause difficulties in terms of meeting the definition of hostels for HB purposes. In those many instances in which a local authority is providing temporary 'hostel' accommodation in its own mainstream stock, this also would not be exempt as it is self-contained.

Outwith situations in which a local authority is the landlord, note that accommodation used as a 'hostel' may also be classifiable as SEA or Managed Property, in which case the requirement for the accommodation to be self-contained would not apply.

Temporary/Emergency Accommodation

Temporary/Emergency Accommodation (i.e. accommodation specifically used by local authorities to discharge their legal responsibility to provide a short term dwelling for persons/families who present themselves to the council as homeless) enjoys the same exemptions from welfare reform provisions if it satisfies the Specified Accommodation criteria. However, much accommodation used for these purposes would not meet the criteria for exemption, for example, if it is owned by a local authority, self-contained and not a refuge, or if there is no provision of care and support to tenants in temporary accommodation other than refuges.

In considering the development of future temporary and emergency accommodation, it would be worth bearing in mind the implications of the Specified Accommodation regulations and their impact on the availability of project funding and housing support for future tenants.

Additional to the above effects of welfare reform, under Universal Credit regulations, the level of assistance available for the housing costs of residents of temporary or emergency accommodation for homeless people is likely to be restricted to the Local Housing Allowance plus a management element of £45 per week. The Shared Accommodation Rate, restricting the eligible HB claim for people under the age of 35 to the Local Housing Allowance rate for a single room in a shared house, would also apply. The housing element will be paid direct to the

claimant as part of their Universal credit payment. The management element of £45 per week is to be administered separately and paid directly to the landlord.

The restriction to the Shared Accommodation Rate for under 35's is a particular concern. Since the abolition of priority need in 2012, the client group of homeless people statutorily supported through accommodation provision has expanded to include single people, who may often have additional needs such as poor mental health or addiction issues. As a shared accommodation arrangement is one housing solution currently being explored by many housing authorities/providers, this client group may well be disproportionately affected by this specific aspect of the welfare reform provisions.

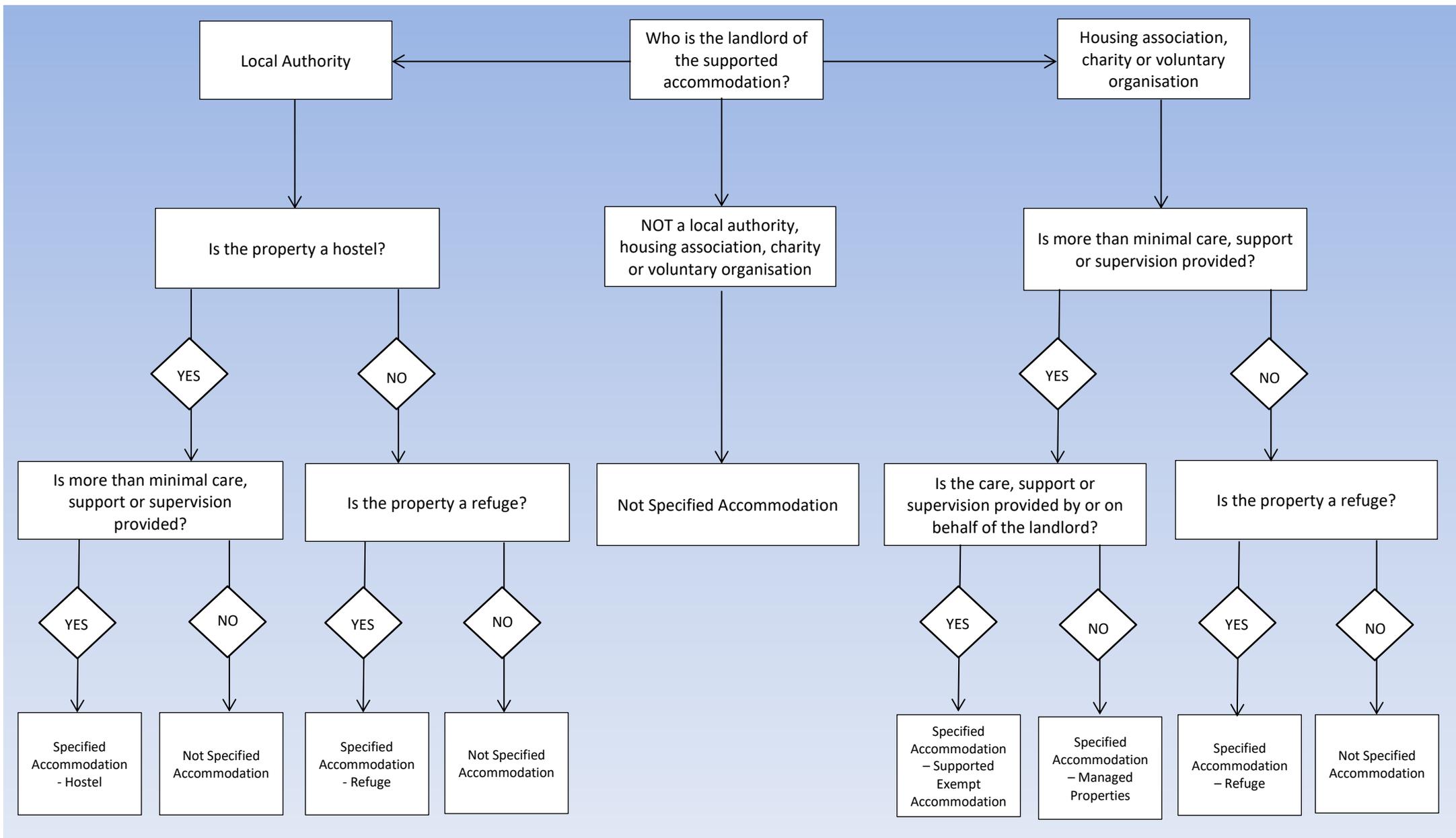
ACTION CHECKLIST

1. Providers of supported accommodation and HB practitioners should work closely to develop a Register of Specified Accommodation.
2. Agree a protocol for the maintenance of this Register.
3. Providers of supported accommodation should hold discussions with HB practitioners at an early stage of planning accommodation that may be classified as Specified to agree whether the property should be added to the Register or not. (Alternately, developers of accommodation that may fall outwith the Specified Accommodation regulations should bear in mind the implications of the regulations when developing project budgets.)
4. Make the Register accessible for providers of supported accommodation so they can check the entries and advise of any changes or additions.
5. Ensure that project schedules indicate clearly the costs of providing care, support or supervision within the accommodation.
6. Ensure that annual rent increase notices clearly indicate the costs of providing care, support or supervision within the accommodation.
7. Ensure that occupancy/tenancy agreements are entirely clear as to the identity of the landlord. This is especially important in situations in which different organisations own and/or manage the property and/or are responsible for the provision of care, support or supervision within the accommodation.
8. Review leases and other documentation to ensure that it is totally clear who the landlord is, as far as the tenant is concerned, in situations in which the landlord is not the property owner and/or the property manager.
9. Ensure that management agreements clearly indicate the nature of the relationship between the landlord and the provider of care, support or supervision in cases in which care, support or supervision is being provided on behalf of the landlord by another organisation.

10. Ensure that job descriptions accurately reflect individuals' responsibility for the provision of care, support or supervision.

APPENDIX – DEFINING SPECIFIED ACCOMMODATION FLOWCHART

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Scotland's Housing Network (SHN)

The SHN is the national benchmarking club in Scotland and supports landlords to improve services by benchmarking cost and performance results and sharing best practice. The organisation also provides support to landlords to conduct peer review and self assessment to assess the quality of services. With over two thirds of social landlords in Scotland as members of SHN, the organisation plays an important role in driving up service standards across Scotland.

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