Consultation response

Shelter response to Social Security Advisory Committee consultation: Universal Credit regulations call for evidence

July 2012

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Shelter welcomes the opportunity to comment on the Universal Credit draft regulations. The Welfare Reform Act is a skeletal act and we were concerned that some areas of policy detail were not sufficiently developed to allow adequate scrutiny during the parliamentary process. We therefore are pleased that SSAC is now scrutinising the regulations.

Our response focuses on the areas which SSAC has indicated are of particular interest and highlights a number of additional changes which are of concern to us. This is not a comprehensive list but reflects the areas we think should be prioritised for revision.

Summary of key recommendations

- SMI payments to be based on claimant's actual interest rate, subject to a reasonable cap.
- SMI waiting period to be retained at 13 weeks under Universal Credit.
- Telephone and face to face applications to be retained until digital inclusion is fully achieved.
- The Department for Work and Pensions works urgently with the banking sector to ensure adequate financial products are available to support direct payments.
- Households working “mini jobs” should be exempted from the benefit cap.
- Households in temporary accommodation should be exempted from the benefit cap or the cost of TA excluded.
- Existing 13 and 52 week protection rules for households should be retained.
- Households facing an unavoidable delay in moving into a new home or threats of violence or abuse should be entitled to housing cost support for two properties for a limited period.
- Under 25s on JSA or ESA should be exempted from a housing cost contribution.

Areas of interest to the committee

Support for mortgage interest

Support for Mortgage Interest (SMI) is a vital safety net that helps to prevent repossession and homelessness. It is also extremely cost effective, with the average weekly payment to recipients just £30. This compares to average housing benefit payments of £107.24 for private renters[1].

Universal Credit was intended to end the distinction between “working” and “non-working” households within the benefit system. Despite this, support for mortgage costs will only be payable to households without any earnings. This largely mirrors the status quo, whereby SMI is only paid via a passported benefit, but will penalise households previously eligible for Income Support who were able to work less than 16 hours a week and remain entitled to SMI. The Department for Work and Pensions have informed us that a very low percentage of households made use of this but has not yet published data to verify this.

The cliff edge that will be created by the sudden and complete loss of SMI for households entering work will have a theoretical impact on work incentives, as households will become liable for their entire mortgage payment when moving into work. However, this will be mitigated somewhat by the enhanced earnings disregard for households not receiving support for housing costs. In addition, previous research suggests that homeowners are less influenced by structural work incentives. Research by DWP into SMI claimants found: “no indication of any work disincentive amongst respondents – almost all express a keen desire to work...Many had expected to return to work very quickly and were surprised to find themselves still out of work at the time of the interview[2]”. A household with a mortgage is more likely to have a track record of stable employment, and will need to move back into work if the mortgage is to be sustainable over the long-term, creating a further incentive. In light of this and in the current financial context we would not recommend that the department prioritise any additional spending on in-work homeowners.

1 DWP housing benefit caseload tables, March 2012.
2 Munro M et al, An Evaluation of the 2009 arrangements for Support for Mortgage Interest, 2010.

Our primary concerns around support for homeowners centre on: the waiting period before support is payable; the amount of interest covered; and the question of direct payments.

Under Universal Credit SMI will continue to be paid in line with the Bank of England's published Average Mortgage Rate. This creates affordability problems for homeowners with higher interest loans. Shelter services have seen many examples of people who suddenly found themselves with a huge shortfall to pay and quickly got into arrears. This was exacerbated by the department's poor communications when the rate was moved from 6.08% to 3.63% in 2010, leaving households little time to prepare for a significant drop in income. It would strengthen the safety net for homeowners to base support on their individual interest rate, subject to a reasonable cap. We do not think this would overly complicate Universal Credit as it would mirror the variations in support for tenants' housing costs. Furthermore the Council of Mortgage Lenders estimates a variable rate would save the government £26 million a year, rising further if a cap was applied[3]. We recommend that lenders should be required to report the rate applicable to an individual household to DWP, to avoid the risk of fraud and error.

The Government is yet to confirm the waiting period for SMI under Universal Credit. Waiting periods are imposed on the assumption that households should be able to sustain their own housing costs during an initial drop in income. However, previously 44% of households incurred arrears during the waiting period when it was set at 39 weeks[4]. Savings are often inadequate and take-up rates of private insurance are low. There is little evidence that a long waiting period encourages take-up of private insurance. In light of this Shelter was strongly supportive of the reduced 13 week waiting period to access SMI. This helped retain lender confidence in the scheme. We recommend that the waiting period does not return to 39 weeks as this will increase the risk of arrears and repossession.

We welcome the confirmation that Mortgage Interest Direct will be retained. Any moves to pay SMI direct to customers would risk undermining lenders' confidence in the scheme, as the perceived risk of arrears would increase. It will also avoid practical concerns, such as SMI payments being automatically directed towards overdrafts or other debts.

Implications of shift to online claiming

The move towards digital by default is high risk and we recommend that alternative channels are retained initially for households who are unable to self-serve online. DWP intends that the vast majority of claimants will access Universal Credit online and it is understood that they will pursue an aggressive strategy to achieve this. The Department has said that an element of telephone and face to face support will be retained for a small minority of households, but has provided very few details of who will be eligible to access this or how it will be provided.

In attempting to lead a digital revolution, Universal Credit risks leaving vulnerable households behind. Only 77 per cent of households have internet access and 17 per cent of the population have never used the internet[5]. Unsurprisingly lower income households are more likely to have never used the internet and only 63 per cent of all tenants have an internet connection at home[6]. Libraries do not provide guaranteed provision, especially for people living in rural areas. Internet cafes are not universally available and can be inhospitable environments, often lack disabled access and are not free at the point of use.

The move towards a centralised online application process will downgrade or eradicate the role of housing benefit officers. Despite efforts towards simplification, the centralised system of Universal Credit will have to accommodate many complexities arising from 'housing benefit' claims, for example exemptions from the shared accommodation rate and short-term liability on two properties. In addition claimants may need support to complete a more routine application.

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[3] http://www.cml.org.uk/cml/publications/newsandviews/106/398
[4] http://www.jrf.org.uk/sites/files/jrf/F429.pdf
[5] ONS figures 2011
[6] ONS Statistical Bulletin 2010.

We recommend that telephone and face to face support is retained for claimants unable to self-serve digitally or with complex cases. As digital inclusion is extended, and if Universal Credit simplification is successful, than these can be scaled back over time as need declines.

Payment period

Housing benefit is paid either every two or every four weeks in arrears. Under Universal Credit it will be paid by calendar month, also in arrears. This may create some additional budgeting challenges. However in our opinion, the biggest challenges will arise from the unification of different benefit streams and resultant loss of a defined benefit for housing costs, and the move towards direct payments by default for social tenants.

Ministers claim Universal Credit will mimic a salary payment. However, half of lower income tenants are paid at more frequent intervals[7]. In addition fixed monthly payments are unlikely to align with the date when salaries are paid even in the event of monthly payments. There are no guarantees that Universal Credit payments will align with rent cycles and a tenant could be in the position of trying to safeguard the next month's rental payment for nearly the entire four week period.

The payment of housing benefit in arrears has long been criticised because it sits poorly with the convention of rent being paid in advance. As such many tenants on housing benefit will find that they are in arrears by default and a small delay in processing a monthly Universal Credit claim could result in tenants technically being eight weeks in arrears, which can be the trigger for landlord action. Research with landlords reveals that the inability for housing benefit to be paid in advance is seen as a major drawback[8]. Both rent in advance and deposits are normal requirements for non-HB tenants and the inability of many claimants to provide these sums puts them at an additional disadvantage in the market. Universal Credit does not attempt to rectify these concerns and households will continue to receive support for housing costs in arrears.

The introduction of LHA facilitated a significant reform in the payment of housing benefit, with the default assumption that tenants should receive their housing benefit direct to their own bank accounts. Some protection was included for tenants judged to be vulnerable or likely to struggle to manage their finances, and tenants in significant arrears. The move has been problematic for many low income households, because of the impracticalities created by a large rental payment passing through a bank account. With competing demands from other debts and bills, payments can either be swallowed up to cover other commitments or bank charges, or deliberately used to pay for other essentials as a short-term priority.

Half of claimants who have experienced both systems report that they prefer landlord-payments[9]. Equally significantly, default direct payments are a source of considerable frustration for landlords and discourage landlords from operating in the HB market[10]. DWP research found that the proportion of landlords who said they would never consider letting to LHA claimants increased from 31 per cent to 36 per cent after the national roll-out of LHA[11].

The switch to direct payments was initially ideological rather than practical, and this approach has been continued by the Coalition government (despite pre-election commitments from the current Housing Minister to reverse this). It was intended that direct payments would improve financial literacy and responsibility, thereby preparing claimants for work. The current Minister for Welfare Reform continues to speak of the importance of direct payments as a "core part" of Universal Credit in "supporting [people] in managing their finances and getting true independence.[12]" The introduction of Universal Credit as a single payment makes a return to tenant choice less likely: it creates practical difficulties where a tenant is in receipt of partial Universal Credit; and the principles behind Universal Credit further undermine carving out a protected component.

[7] BACs, Family Finance Survey, 2011
[8] DWP, Two Year Review of the Local Housing Allowance, 2011
[9] DWP: Early Experiences of the LHA in Nine Pathfinder areas: LHA Evaluations 6.
[10] DWP, Two Year Review of the Local Housing Allowance, 2011
[11] DWP, Two Year Review of the Local Housing Allowance, 2011
[12] House of Lords Debate, 14 December 2011

Social landlords and lenders have, however, voiced considerable concern at the implications of direct payments for social tenants, including for their ability to secure finance for new affordable housing supply[13]. Combined with the move towards monthly payments, there is considerable apprehension as to how social tenants will manage their incomes. The DWP has agreed to a series of demonstration projects to test the problems created by such a move, but remains committed to the principle.

With nearly five million households receiving support for housing costs directly it could be that default direct payments under Universal Credit are the catalyst to improve banking products for low-income households. Ministers have spoken of the possibility of 'jam jar' accounts or escrow products, which would prevent the housing element of UC being diverted to cover overdraft fees and other direct debits. It is unclear how ready banks are to provide such products and we would urge the DWP to engage with the banking industry to ensure products are in place to support financial inclusion.

Housing benefit cap and the links with in-work rules including the grace period

The benefit cap will undermine the key principles of Universal Credit, which Shelter was originally happy to support. Universal Credit was intended to create a seamless transition in and out of work and end differing benefit rules linked to working status. This will be undermined by the benefit cap, which will be applied to out of work households only.

Universal Credit was also intended to reward the concept of mini jobs. Households working just a few hours a week would be recognised as in-work and eligible for additional support. However, households with mini jobs will still be penalised by the benefit cap, as they will not be counted as working until earning the equivalent of 16 hours a week at the national minimum wage. This is inconsistent with the broader principles of Universal Credit and fails to recognise the value of mini jobs as a route to stable employment.

We welcome confirmation of a grace period for newly unemployed households, and called for such a measure during the passage of the bill. Nine months should provide sufficient grace to enable the majority of households leaving work to re-enter employment. Figures suggest that eight in ten JSA claimants left the benefit within nine months[14]. However, it may be that the types of households affected by the cap have additional barriers to employment, specifically high childcare costs, and this should be monitored during the review of the cap.

Impact of the cap across a range of policy areas other than social security

Shelter is extremely concerned at the impact the cap will have on homelessness and on local authorities' ability to meet their obligations under current homelessness legislation.

The benefit cap will increase the risk of homelessness. This was acknowledged in the DWP's first impact assessment published in 2011 but removed without explanation from the updates in 2012. Prior to publication of the revised impact assessment, the DWP offered no mitigations which would justify removing this as an identified risk. Households will be at risk of homelessness because many will struggle to afford their rental obligations under the cap, and in some cases it will not be reasonable for them to continue to occupy their accommodation due to unaffordability, satisfying the legal definition of homelessness. Because arrears will have arisen as a result of a government policy change the household should not normally be found intentionally homeless, and if they are also in priority need they will be owed the full homelessness duty. The risk of reduced income will also make landlords more likely to evict tenants with rent arrears, refuse to renew tenancies for larger households, or restrict the households who they will let to in case they are caught by the cap at a later date, making it more likely a household will seek support from their local authority. It was notable that the early findings from the

[13] National Housing Federation: Submission to DWP, Housing Benefit direct payments to social tenants and the design of Universal Credit, July 2011; Briefing by the Council of Mortgage lenders on housing benefit and support for mortgage interest, 29 March 2011

[14] http://www.theyworkforyou.com/wrans/?id=2012-03-14b.97621.h&s=%22JobSeeker%27s+Allowance%22+%22duration%22+department%3AWorkandPensions#g97621.r0

independent study monitoring the impact of LHA changes found high awareness among landlords of the overall benefit cap[15].

Analysis of the statutory homelessness statistics suggests that the private rented sector is increasingly a factor in homelessness. The figures show the loss of an Assured Shorthold Tenancy is now the joint most common cause of homelessness, reported by 19% of all households accepted as homeless[16]. The rise of homelessness acceptances in itself may also be an indication that low income households are unable to resolve their own housing need via the private rented sector, and are forced to apply to the local authority for assistance. Taken together, and combined with the increasing use of B&Bs to house homeless families, this suggests landlords are already withdrawing from certain sectors in response to benefit changes and competition from other higher income households.

Temporary accommodation

We are greatly concerned about the problems the benefit cap will create when homeless households are placed in temporary accommodation. Homeless households in temporary accommodation are liable for a "reasonable charge" for their accommodation, which can be covered by housing benefit if the household is on a low income. Temporary accommodation tends to be more expensive than rents in the mainstream private rented sector, and is considerably more expensive than social housing rents, creating a high risk that rents will not be affordable under the overall benefit cap.

Because households are placed in TA by local authorities, they will have little scope to move to reduce their housing costs and under the Homelessness Code of Guidance local authorities cannot ask households to make up the shortfall through other benefits if this would deprive the household of "basic essentials such as food, clothing, heating, transport and other essentials." As a guide to what level of income is required after housing costs have been met, the Homelessness Code of Guidance recommends that local authorities refer to the 'applicable amounts' used in housing benefit legislation. The principle behind this is that the applicable amount set out in housing benefit legislation is the minimum the state considers necessary for subsistence living and as such families cannot be left with a lower income than this once housing costs have been paid for.

Attempts to procure TA which is affordable under the cap will create the risk of widespread out of area placements, which the Housing Minister has warned against: "The most vulnerable in our communities who find themselves homeless through no fault of their own deserve a safe and secure roof over their heads, close to their community wherever possible.[17]"

Throughout the bill's passage Shelter, along with others, called for households in TA to be exempt from the overall benefit cap. The Minister refused an explicit exemption but promised to look at assistance for "hard cases" to ensure regulations provided the "appropriate protection" for households in TA. [18] It is not at all clear from the regulations what protection is now being proposed. We strongly recommend that an exemption for households in temporary accommodation is included in the final regulations. This could satisfactorily be achieved by exempting all statutory homeless households from cap restrictions or simply ignoring the cost of temporary accommodation when calculating the cap.

Lord Freud said repeatedly in parliament that the forthcoming reform of TA subsidy would be informed by its interaction with the cap and impact on final decisions around mitigation. It is very concerning that the draft regulations have been published before the TA subsidy reform proposals are available. This prevents proper scrutiny of the interaction between the cap and TA. Lord Freud said: "We need to get a solution to this so that we do not have a ludicrous go-round of people moving into expensive temporary accommodation which they can no longer pay for because of the cap. We are absolutely aware of this and have measures in train to get a solution in the round to that issue[19]." Based on the available

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[15] Beatty C, Cole I and others, Monitoring the impact of changes to the local housing allowance system of housing benefit: summary of early findings, 2012.
[16] CLG live tables, Q1 2012
[17] Grant Shapps, 31 May 2012, CLG press release.
[18] House of Lords Debate, 23 January 2012, c894
[19] House of Lords Debate, 23 January 2012, c893

information we still believe the cap risks creating a “ludicrous go-round” where families are made homeless by the cap and then placed in unaffordable TA.

Implications for the monitoring project and any proposals for mitigation

Due to the considerable risks outlined above, Shelter recommends that housing and homelessness is made a specific key theme in the proposed review of the benefit cap. This would include numbers in TA as well as the location of TA placements in relation to the household’s origin. It should also consider local authorities’ ability to procure TA and the additional financial costs they may be bearing, for example through increased use of B&B accommodation. It should also look at the numbers of households accepted as statutory homeless due to the cap and those assisted through Housing Options.

Linking LHA rates to CPI

Shelter has opposed the move to up-rate LHA rates by CPI rather than local rents. This breaks the long-standing principle to link housing benefit payments to housing costs, either actual or representative, and marks a fundamental change in the calculation of housing benefit.

Historically CPI has risen at a much slower rate than actual private rents. Between 1997 and 2007 private rents increased by 70% but CPI increased by only 20%[20]. The implication of this is sadly obvious – over time LHA rates will fall out of step with actual rents and tenants on housing benefit will find it increasingly difficult to find affordable accommodation.

The Minister for Welfare Reform recognised the risk that LHA values would erode at various points during the passage of the Welfare Reform Act. The Minister told parliament: “In particular, we may need to increase LHA rates if growth in rents and the CPI are so out of sync that there is a critical lack of affordable housing.” The minister dismissed concerns of long-term erosion by insisting that the measure is only locked in for two years.

We would like to see the impact of CPI formally reviewed at the end of 2014/15 with a commitment to re-linking LHA rates to at least the 30th percentile if necessary. This decision should be informed by the ongoing DWP monitoring project into the first wave of LHA reforms. Based on this study it may emerge that the 30th percentile is itself insufficient to house the number of private renters in receipt of LHA. If this is the case than re-linking LHA rates to the 30th percentile will not do enough to correct a critical lack of affordable housing and a larger correction of LHA rates will be necessary.

Any issues around service charges in the private rented sector and Universal Credit

We have no evidence that service charges are a particular problem for private rented tenants claiming housing benefit. Service charges tend to be absorbed by the landlord and/or passed on into rent payments. This may, however, mean that rent payments are above the relevant LHA rate.

Additional areas of interest to Shelter

Loss of 13 week and 52 week protection

Under current housing benefit legislation a household is exempt from eligible rent restrictions, for example the LHA rate or, from 2013, under-occupancy penalties in the following circumstances:

- For 13 weeks if they or any combination of people in their household could previously afford their rent and they have not received housing benefit in the past 52 weeks
- For 52 weeks if anyone in their household has died in the previous 12 months and the claimant has not moved since that death. For households who were in receipt of HB at the point of bereavement their eligible rent cannot be reduced further for 52 weeks, new claimants are exempt from all rent restrictions.

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[20] Fenton A, How Will Changes to LHA Affect Low Income Tenants in Private Rented Housing, Cambridge Centre for Housing and Planning Research, 2010.

These protections will be removed under Universal Credit. The DWP has told us this is for simplification purposes rather than to save costs. We are concerned at the impact of this and urge the department to retain both protections.

The 13 weeks protection ensures that people who have recently lost a job do not immediately face the prospect of the loss of their home because of inadequate housing benefit coverage. It supports housing benefit's role as a safety net and prevents a setback spiralling further.

Figures are not readily available for the number of households who currently benefit from the two protections. However, we would expect the number of beneficiaries to increase following recent housing benefit cuts. The reduction in LHA rates will make it more likely that a household's rent is considerably above the applicable LHA rate, and the under-occupancy criteria will also expose social tenants to the risk of housing benefit shortfalls.

The 52 week protection will be replaced by a benefit run on for three months. This is considerably less generous and we are still seeking further details from DWP on how it will work in practice for new and existing claimants.

Occupation rules and overlapping entitlement

There are a number of strict criteria under current legislation where a claimant may receive housing benefit on two properties or on a property which they are not technically occupying. These set of circumstances will be narrowed in the move to Universal Credit and we are concerned some valid reasons for overlapping entitlement will now be disallowed.

Under Universal Credit a household must normally be liable for rent on a property they occupy as their home to qualify for support with housing costs. There will also be a general rule that no one is to be treated as occupying more than one place as their home. There will be exceptions in the following circumstances:

- Liability on two homes has arisen because of a need to move into new accommodation specially adapted to meet the needs of a disabled person.
- The claimant has had to move out of their normal home temporarily due to essential repairs.
- The claimant has had to move because of fear of violence in their normal home.
- A family has been housed in more than one unit by a social landlord because of the family's size.
- Accommodation will be treated as occupied if liability has arisen because a claimant will shortly be leaving care or hospital.

This will mean that some households currently entitled to receive housing benefit on two properties will be disadvantaged under Universal Credit. Specifically:

- Claimants who have moved but remain liable for rent on their old home for up to one month.
- Tenants waiting for a social fund payment in order to furnish a new property.

The above criteria can be applied in strict circumstances only. They have been introduced over time to recognise the unavoidable complexity of people's lives, particularly at a point of transition. Often households will be vulnerable and facing considerable upheaval at the point they need to access these exemptions. For example a homeless household leaving temporary accommodation and waiting for a Social Fund payment to allow them to furnish and move into a more permanent property. Work by Shelter Scotland has identified that a large majority of Homelessness Officers highlighted the importance of furniture for the sustainment of tenancies by homeless persons, with prompt assistance with furniture key to helping people move into tenancies[21].

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[21] Shelter Scotland, Research report Furniture for the homeless: A house without furniture is not a home, August 2010 http://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/furniture_for_the_homeless_a_house_without_furniture_is_not_a_home

The DWP may consider that the specific clause relating to Social Fund payments is redundant as the scheme will be localised from April 2013 and there are no guarantees that local authorities will provide essential furniture. However, the first category will remain common. This clause is particularly important for household moving from a private rented property to a tenancy in the social sector. Social landlords will often expect tenants to move promptly to avoid void periods, but they will be contractually obliged to serve notice on their privately rented home. It is very unlikely that low income households will be able to service rent on two properties and removal of this clause will put them at risk of debt, eviction or tenancy abandonment (which, as private rents are typically higher than social ones, means the state will end up paying out more in housing support over the long term).

We are also concerned about the implied narrowing of the protections for households at risk of violence. The draft regulations specify that a household occupying a second home because of a fear of violence must be at risk of domestic violence, as defined under section 2.2 of "Responding to domestic abuse: a handbook for health professionals" published by the Department for Health in 2005. This is more restrictive than the current requirements, which state the threatened violence does not have to be domestic abuse, and will penalise households forced to move temporarily because of fear of violence from neighbours, for example in cases of racist abuse.

Housing cost contributions

Non-dependant deductions will be replaced with a housing cost contribution under Universal Credit. This will retain the principle that adults sharing a property with a claimant should contribute towards the rent, but radically simplify the way in which this is calculated. Simplification has been one of the government's stated aims throughout, but the impact of this will be a highly regressive reform that penalises young unemployed people living at home with their parents while significantly reducing the contribution exempted from non-dependants in work.

Currently a deduction is not applied if a non-dependant is under 25 and in receipt of JSA or ESA. This exemption will be lost under Universal Credit, meaning unemployed young people and those not expected to work because of ill health will be expected to contribute around £65 a month towards their parents housing costs. This is problematic as benefit levels for under 25s are considerably lower than for older adults and JSA/ESA payments are not intended to cover accommodation costs. Previous research into the impact of non-dependant deduction found younger non-dependants were less likely to cover their share of housing costs[22]. Furthermore the same research and anecdotal evidence from Shelter's services suggests claimants are not always aware that a non-dependant should meet the shortfall, or do not feel able to request payment. Tension over unpaid non-dependant deductions already causes confusion and family tension and there is a risk that non-dependants unable to afford their contribution will be asked to leave, particularly if the household is already overcrowded. They will then be eligible to make a Universal Credit claim, including housing costs, in their own right, increasing overall costs for the taxpayer.

Shelter raised concerns about the impact of the housing cost contribution with DWP officials during the development of the policy. We are pleased that all under 21s will now be exempt from a contribution, and this will be an improvement on the current regime which levies a deduction once a non-dependant turns 18. However, unemployed young people aged 21-24 will still be liable for around £780 a year which they do not currently have to pay. We recommend that all under 25s on JSA or ESA continue to be exempt from housing cost contributions.

Contact: Kate Webb, Policy Officer.

Until there's a home for everyone

[22] DSS, Paying for rented housing: non-dependant deductions from housing benefit, 1995

In our affluent nation, tens of thousands of people wake up every day in housing that is run-down, overcrowded, or dangerous. Many others have lost their home altogether. The desperate lack of decent, affordable housing is robbing us of security, health, and a fair chance in life.

Shelter believes everyone should have a home.

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