

Review of Social Housing Regulation: Questions

About You

Are the views expressed on this consultation your own personal views or an official response from an organisation you represent?

- Personal view
- Organisational response

If you are responding on behalf of an organisation, please select the option which best describes your organisation

- Local Authority
- Housing Association
- Other registered provider of social housing
- Resident association or tenant panel
- Financial sector
- Trade association or interest group
- Tenant Management Organisation (TMO)
- Arms Length Management Organisation (ALMO)
- Other (please specify)

Please provide the name of your organisation

The Almshouse Association

Principles of Regulation

Q1. We would welcome information on whether the current statutory objectives, and monitoring and enforcement powers are right, whether they need amending, and if so, how.

The Almshouse Association is of the opinion that the current regulatory regime is on the whole, proportionate, consistent, transparent and accountable.

Q2. We would welcome information on whether the “regulated self-assurance” approach to regulation of social housing is the right approach. If not, how should it be changed?

The Almshouse Association would agree that the “regulated self-assurance” approach to regulation of social housing is the right approach.

Economic Regulation

Q3. We would welcome information on the effectiveness of the current approach to economic regulation.

A proactive, risk-based approach to economic regulation focussing on the largest and most organisationally complex providers is sensible.

The Almshouse Association welcomes the recognition that a number of organisations, including almshouses, have charitable status and are, therefore, driven by their charitable objectives. The Almshouse Association would ask that consideration is given to ensure that the smallest charitable providers are properly helped to achieve their objectives. This could be achieved by close working with their main regulator, the Charity Commission and/or with sector representatives such as the Almshouse Association.

Q4. We would welcome information on any areas of the economic regulatory framework which might not work effectively or provide sufficient oversight when meeting the challenges of the evolving sector.

No comment

The Regulatory System as a Whole

Q5. We would welcome information on any specific issues that we should be aware of as the review progresses, to ensure that we retain a coherent regulatory framework.

The Almshouse Association completely agrees that “it is in the interests of residents that their housing provider is well run and financially sound to be sure that their homes are secure for the long term and the landlord is able to fund the repairs and support services they need.”

However, there is an ongoing issue where some almshouse charities have charged a historically low level of Weekly Maintenance Contribution (WMC), well below

formula rent. This was done with the best intentions of the trustees at the time. These charities are now unable to raise their levels of WMC above the CPI +1% cap as prescribed in the current rent regime.

Consequently this has an impact on these almshouse charities being financially viable in the longer term and able to fund the repairs and support services that the residents need.

We would ask that the government allows registered providers who are charging significantly below formula rent to be allowed to raise them up to the level of formula rent in order to ensure a coherent regulatory framework as soon as possible.

Q6. We would welcome information on any risks arising from improving the approach to consumer regulation enforcement.

No Comment

Relationship with the Hackitt Review

Q7. What are your views on risks and opportunities presented by the regulatory regime suggested by Dame Judith Hackitt and how that should work with social housing regulation?

The Almshouse Association welcomes any changes that create greater transparency and clear accountability to ensure that residents are safe and 'feel safe' in their homes.

Part of that clear accountability must be to avoid any duplication in regulation and to work closely with sector partners such as the Almshouse Association.

Any Other Suggestions for Improvement

Q8. We would welcome any further information that might inform the review of the regulatory framework.

The review of the regulatory framework should:

- a. Make sure that the smallest providers, such as almshouse charities, are allowed to properly demonstrate their value.
- b. Not duplicate the work of other regulators and frameworks, for example the Charity Commission, in relation to governance and charitable objects.
- c. Investigate whether formalised partnership agreements would assist the regulator. For example the Charity Commission has a policy agreement in place with the Almshouse Association to work in partnership and to share information regarding almshouse charities.