The inquiry seeks answers to the following questions:

1. How widespread and serious are the concerns about the quality of social housing?
2. What is the impact on social housing providers’ resources, and therefore their ability to maintain and improve their housing stock, of the need to remediate building safety risks and retrofit their homes to make them more energy efficient?
3. Is the current regime for regulating social housing fit for purpose?
4. How clearly defined are the roles of the Regulator of Social Housing and the Housing Ombudsman?
5. Does the current regime allow tenants to effectively resolve issues?
6. Do the regulator and ombudsman have sufficient powers to take action against providers?
7. Will the reforms proposed in the social housing White Paper improve the regime and what progress has been made on implementing those reforms?
8. What changes, if any, should the Government make to the Decent Homes Standard?
9. Should the Decent Homes Standard be amended to include energy efficiency and other means of mitigating climate change, and if so how?
10. Should all providers of social housing, not just councils, be required to register with the regulator?
11. What challenges does the diversification of social housing providers pose for the regulatory system?

**The Almshouse Association  
Response to HCLG Committee**

The Almshouse Association (TAA) is the membership body for the c.1,700 almshouse charities across the UK. For 75 years we have provided guidance and support to our members to ensure that they provide the highest level of support to their beneficiaries, continuing the ethos which has stood the test of time for the last 1,000 years.

Almshouses have a unique legal status as confirmed in 2018. They are regulated by the Charity Commission and overseen by locally appointed representatives who have legal personal responsibilities in running almshouses properly. Furthermore, they benefit from the oversight and support of TAA, particularly The Standards of Almshouse Management (SAM). Through SAM, members have the standards that they are expected to follow, and guidance on how to achieve them. SAM covers all areas of good governance such as financial, residential and accommodation management.

We are proud of the work our members put into ensuring that their dwellings are maintained to a high standard and so we have no major concerns over the quality of our housing. Through their Weekly Maintenance Contribution (almshouse rent) they ensure that sufficient funds are reserved for maintenance and upkeep of the dwellings. This means that all funds raised go towards the running of the almshouses and ensuring they remain in good condition.

However, as many of our members are managing historic and listed buildings this task is not easily achieved. TAA offers support including loans and grants to ensure that our members are supported in making necessary adjustments. However, more needs to be done to support charities to make these adjustments, particularly listed buildings which are being used as homes. This largely concerns greater co-operation from conservation officers and local planners. This issue is likely to grow in significance as a result of the push to retrofit dwellings.

TAA is encouraging its members to consider green alternatives when building new or refurbishing/retrofitting their dwellings. Yet, the significant costs associated with this means that these charities will not all be able to meet the challenge without significant support. TAA cannot provide this support on its own. Government must produce a long term vision for retrofitting with suitable funding to meet the challenge. This funding should look to provide specific support and guidance to properties which are ‘hard-to-treat’ such as listed buildings. This is particularly important should energy efficiency be included in the amended Decent Homes Standard.

Additional support is available for remodelling/refurbishment through the Affordable Homes Programme, however, this is where regulation can make the situation harder for almshouses, as only 300 of our members are dually regulated by the RSH and the Charity Commission. This means that the number of members who can access the Affordable Homes Programme, and other funding schemes, is restricted. This is not due to an unwillingness to engage with regulation but due to almshouses already being regulated by The Charity Commission. For many almshouse charities, run by volunteer trustees and operating on fine margins, additional regulation from the RSH is a burden that would have a detrimental impact on the viability of small almshouse charities.  
Furthermore, there is a financial impact of registration which disproportionality affects almshouses which tend to be smaller providers of housing. The cost to register is £2500 and £300 a year for those with less than 1000 units. This means that a provider with over 1000 units would pay £5.56 per unit. This compares to £10.35 per unit for our members who are RPs and have an average of 28 units.

As such, we believe that regulation of almshouses through the Charity Commission should be recognised as sufficient to allowing greater access to funds for almshouse charities. This would allow for regulation and proper maintenance of the almshouses whilst respecting the supremacy of charity law and the role of the Commission in charitable matters. Moreover, this process would also allow the regulator to focus on the larger housing associations with over 1,000 dwellings for which is was established. We do not believe that almshouse charities, 80% of which have less than 20 dwellings, should be treated in the same way as a large housing association.

On this basis, we do not believe that all providers of social housing should be required to register with the regulator and that instead a more tailored approach would see better results. We believe that regulation of the almshouse sector should remain solely with the Charity Commission and that this should be recognised as sufficient for accessing funding through schemes such as the Affordable Homes Programme. This would provide more appropriate oversight of the movement and free them to explore the expansion of this genuinely affordable form of housing.

TAA would be happy to provide oral evidence as part of the committee’s ongoing inquiry on this matter.

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Members comments to the above proposed response to be sent to [JackBaldan@almshouses.org](mailto:JackBaldan@almshouses.org) by 15th December 2021.