

Written evidence submitted by Look Ahead [RSH 087]

About Look Ahead

Look Ahead is a specialist supported housing association and provider of tailor-made care, support, and accommodation services. We have nearly 50 years of experience in delivering mental health, learning disabilities, homelessness, and young people services. Our 110 services across London and the South East are commissioned by local authorities and NHS trusts, and we support the most vulnerable people in our communities.

Our delivery model is mainly accommodation based, Care and Support, although we also deliver some General Needs (unsupported) and Temporary Housing. We provide our services in our owned properties, in housing owned by local authorities and also properties owned by many of the large housing associations including L&Q, Peabody, Clarion and Notting Hill Genesis Housing. We own around 1300 properties ourselves, manage around 1200 properties on behalf of other landlords (where we deliver support services) and operate support-only services in a further 1800 properties which are owned and also managed by other landlords.

Look Ahead's experience in delivering services in our own and other landlord properties gives us an excellent insight into the proposed regulatory framework and in particular how this will relate specifically to supported housing.

Whilst we recognise and support the need for regulatory changes to social housing broadly, we regard it as crucial that the key issues which are distinct for supported housing are not lost within the feedback from mainstream providers.

Executive Summary

- Over the last 15 years we have seen a significant reduction in revenue funding and capital investment in supported housing. Since the removal of the Supporting People ring-fenced budgets and subsequent cuts to revenue funding many mainstream housing associations have pulled out of this market. Consequently, the sector has seen a reduction in available units as some supported housing accommodation has been repurposed as general needs. Crucially, the development of new purpose built schemes has ceased to be a priority. Furthermore, much of the accommodation that remains in supported housing is not purpose built and will need significant investment to remain fit for purpose in the medium/long term.
- Very little new supported housing for working age adults has been built over the last few years. This reduction in supply is a significant concern given the direction of current social care policy which involves more people being looked after in community-based settings. We do welcome the recent announcement in the Adult Social Care Reform White Paper for investment into this area but believe it will not be sufficient to reverse the decline seen in the last few years.
- The current regulatory framework does not consider some of the irregularities of supported housing compared to other housing providers. Some providers in our market are operating outside of a proper regulatory framework. Our experience is that they lack the organisation skills and capacity to ensure accommodation they are providing services in is of good quality,

safe, and has appropriate investment in place to ensure it remains fit for purpose. Also, the lack of new supported housing and the quality issues has really limited the choice for commissioners in terms of providing suitable supported housing accommodation to meet the growing demand for all client groups particularly working age adults. The lack of appropriate provision has compelled commissioners to refer service users into inappropriate accommodation, often in the private sector.

Answers to the Committee's questions

How widespread and serious are the concerns about the quality of social housing?

- This is difficult to quantify as recent media coverage has elevated serious issues in social housing but there is some evidence to suggest a rise in complaints across the sector.
- Such disrepair cases are likely to stem from the absence of adequate evaluation and maintenance. Whilst some providers do carry out Stock Condition Surveys, they never reach 100% of the stock, resulting in cloned – instead of real – data being used.
- From our experience of working with a range of social housing providers we believe that there are some really good landlords who are committed to providing good quality homes and meeting their initial social purpose. However, there are others that have become very focussed on commercial priorities due to the level of financial risk they have taken on against a backdrop of reduced rents in real terms.
- In addition, some landlords may have been distracted by meeting their obligations around building new homes, and their required investment in priority buildings following the Grenfell Tower tragedy. This has resulted in them not maintaining and improving some of their lower priority stock, some of which is within supported housing.
- At the same time the regulator's role has changed and is more focused on governance ratings rather than the day-to-day of decent homes.
- We believe the white paper and current changes will go some way to improving standards to give people a bigger voice and for housing associations to respond accordingly. We do not believe that a one size fits all approach to regulation is appropriate and much of what is set out in the (current) Regulatory Framework is not applicable to supported housing.
- However, our experience of an IDA leads us to be hopeful that the regulator will adapt their approach accordingly. This does not cover all providers though; particularly private landlords with poor quality housing that are letting properties to local authorities to provide support services.

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?

- Whilst this clearly depends on the nature and scale of the housing stock that a landlord owns, inevitably the review of Fire Safety has resulted in significant investment across the sector and resources have been directed into fire safety and/or remedial works and this has an impact on other priorities.

- For us, one of the major issues is that the landlords we work with do not have the resources (or perhaps priorities) to invest in the buildings we run services from. As a result of this we are often in the difficult position of challenging landlords to carry out works or even in some situations having to carry out works ourselves to ensure they meet standards for our customers.
On the other end of the scale some of the smaller landlords (under 1000 homes) that are bidding for council run services to run supported housing from are not regulated.
- Often these premises are not at a decent level but because of the lack of housing available for supported housing, councils are forced to consider using these properties. This makes it difficult for good quality providers to be competitive in pricing for supported housing contracts.

Is the current regime for regulating social housing fit for purpose?

- For us there are some gaps in the current regulatory framework. The existing regime does not drive improvements in housing or work well for models of supported housing. In our experience key stakeholders, including commissioners and local authorities, do not have a strong understanding of the unique issues facing supported housing.
- We believe the future framework outlined in the White Paper will be better for supported housing providers although until we are working within the new model we will not know for certain. We recommend that the model is reviewed after 12 months to ensure it is continuously improved in light of experience.
- We are pleased that the new regime will apply to local authority housing stock so that they will have an inspection process comparable to other housing providers. Our experience is that lots of local authority housing is not up to a decent standard. Good quality housing is a fundamental human right so Look Ahead does not bid for support contracts based in housing we do not believe to be of a decent standard for our customers to live in.
- The reality is that some of the areas we work in – for example, homeless hostels – are not being picked up by any current regulatory or policy framework. For example, the recent social care white paper mentions learning disabilities, mental health and, to an extent, homelessness but not housing for young people or victims of domestic abuse.
- Our sector has clearly distinct needs, yet we are treated in the same way as other housing associations. This does not reflect the reality that in some areas such as homeless hostels we have a huge turnover of customers and run services on extremely tight margins but can only claim rents equivalent to those housing people for the long-term on our properties. Our increased costs against fixed income leaves us with very little to invest in modernising services and developing additional properties.

How clearly defined are the roles of the Regulator of Social Housing and the Housing Ombudsman?

- These roles are clearly defined at present though this may change when the regulator gains more powers. In our experience our customers know they have a clear pathway to complain as both organisations are working more closely together.
- We are seeing benefits to the Ombudsman being involved at an earlier stage of the complaints process. We believe that this process is beneficial to tenants whose landlords do not have effective customer complaints procedures in place as it means that everyone has access to an equal service regardless of their landlord.
- We believe that the proposal to have some sort of league table would not be beneficial since it would give a skewed picture, attempting to compare parts of the sector which are fundamentally different. The diversity of the sector in terms of funding regimes, stock/product type and resources, means any such league table would risk comparing apples with pears.

Does the current regime allow tenants to effectively resolve issues?

- Under the old Housing Corporation regime, the regulator would involve customers and tenants, but this is no longer part of the process. There is a gulf between the customer and the regulator. Hopefully, under the new regime there will be different ways to hear from customers as part of the IDA or at least to keep boards up to date with customer views and feedback from engaged customers.

Do the regulator and ombudsman have sufficient powers to take action against providers?

- Yes, they have sufficient powers available but due to lack of resources it appears they are only stepping in at a point of crisis. We are regulated by the Care Quality Commission (CQC) for many of our services, and believe their framework is much more stringent and robust than the Regulator for Social Housing.
- In our view part of the problem is the lack of publicly available data and transparency of data which does not support the level of public scrutiny that it used to. We believe there is a need for clearer definitions and more visibility around things like repairs and maintenance data.

Will the reforms proposed in the social housing White Paper improve the regime and what progress has been made on implementing those reforms?

- It is too early to say at this stage. It will depend on how effective the consumer rights part of the regulation is.

What changes, if any, should the Government make to the Decent Homes Standard?

- In our experience the standard is sufficient, but enforcement of the standard is poor. We believe this standard needs to be extended to private landlords who are receiving public funds for supported housing.

- We also believe that the interpretation of the standard by some providers is very wide. As mentioned earlier we would not be prepared to deliver services in some of the housing that providers deem as decent, yet we know that some commissioners are using this stock.
- The challenge with strengthening the standard is the money available for providers to conduct necessary works with building safety and energy efficiency as the current priority.
- There is no control over rent increases to cover improvements and grants are difficult to apply for or not available for the properties we own (no grants are available for properties under 18 metres in height).

Should the Decent Homes Standard be amended to include energy efficiency and other means of mitigating climate change, and if so, how?

- We believe that the current requirements in this area are sufficient. Without significant additional revenue/grant for this purpose, it would be a major challenge for the sector to meet additional requirements as lots of supported housing stock is in street properties and old buildings and expensive to upgrade to high environmental standards.
- Enforcement of any additional standards would be required as we know from experience that some landlords do not meet current decent homes standards as their resources are stretched with ensuring other buildings are meeting health and safety standards.

Should all providers of social housing, not just councils, be required to register with the regulator?

- Yes, but there are some challenges. The registration process should recognise that providers differ in scale, and therefore by the regulatory regime they follow. Particularly those sub 1000 units who aren't subject to the rules that other providers are.

What challenges does the diversification of social housing providers pose for the regulatory system?

- There are some providers coming into the sector to take advantage of the social housing funding that may not have the same purpose and values of pure social housing providers. The lack of grant funding has meant that some providers are cutting back on repairs and maintenance to fund new development with levels of new, traditional social housing, at social housing rents, declining in favour of more lucrative Shared Ownership or Affordable Rented homes.
- The new regulatory system will still only pick up a small percentage of the housing that is being used to provide supported housing and attract public funds to pay for it. There will remain a major gap for government to address.