

Written evidence submitted by YMCA St Paul's Group [RSH 089]

YMCA St Paul's Group is a long-established, highly regulated and quality provider of Housing, Care and Support to a wide range of young and vulnerable people across London. Our diverse housing stock ranges from large specialist supported housing to smaller properties that provide care for young asylum seekers and teenage parents.

Alongside our social housing, we also provide a wide range of services to the communities where our accommodation is located. This includes access to health and wellbeing services, youth outreach programmes and providing early years activities for families from across the community.

As a provider with more than 1,000 units of accommodation, we are subject to the same regulatory framework as many of the local housing associations. Given our smaller number of resources, we were pleased to be confirmed as a G1 V2 association by the RSH (Regulator of Social Housing) in early 2021. This regulatory judgement confirmed that we have strong governance, good risk management and a strategic direction that was owned by the Board and delivered by the staff. The V2 grade also confirmed we are compliant with the regulator's expectations but, as a specialist supported housing provider, we had lower margins.

As a housing and community service provider we are already highly regulated, our regulators include: RSH, CQC, Ofsted, ICO and Charity Commission. We are also subject to a range of codes of practice including those from the NHF, Ombudsman, HSE, etc. We are also subject to frequent inspections and contract management reviews with the commissioning bodies (usually local authorities) where we have housing related support contracts in place.

With all this in mind we are very keen to submit our response as an association to the consultation and happy to provide further evidence and information on request.

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

In answering this question, it is important to separate out the large, general needs providers, the specialist, not for profit, supported housing associations and then the unscrupulous, often, for profit, businesses entering the market.

The challenges facing the large, general needs providers are different to many others however the financial resources to be able to deal with those are significantly greater. Financial returns and borrowing capacity allow a level of upfront investment that other agencies would struggle to achieve.

For registered specialist supported housing providers, subject to the same levels of scrutiny and oversight on their governance and financial viability without the same resources to meet these requirements, it places a disproportionate demand.

Does the current regime allow tenants to effectively resolve issues?

As a registered provider of specialist supported housing with residents who are referred to us due to challenging circumstances, any complaints system needs to be able to deal with both the physical estate (facilities) and the care and support (health and wellbeing) being provided. The Ombudsman's Code is a strong step towards that, but it should be enforced so that all providers are asked to demonstrate compliance as part of the tenant satisfaction measures.

With the roll out of the principles set out in the Social Housing White Paper the relationship between the Regulator and Ombudsman should be strengthened but structured in a way that avoids duplication.

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?

As a YMCA many of our buildings house young and vulnerable people who have experienced challenging circumstances. Providing them a safe, secure, psychologically informed environment that helps them progress and develop is of critical importance.

The ability for providers such as ourselves to invest in retrofitting our buildings is significantly less than many of the large, general needs providers. The changes required by building safety, fire safety, decarbonisation is significant and so therefore, investment needs to be spread over a longer period. This was compounded during the period from 2015 when rents had to be reduced in line with the rental standard.

Finally, the requirement to invest is also offset by the need to control rent levels for our residents. Specialist supported housing is more expensive to provide given the need to provide intensive housing management and wrap around care. This means that whilst we could increase service charges to recoup some of these costs it does, in turn, make exempt supported housing rents even more unaffordable, especially when one of our residents moves into education, employment or training.

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

We believe in governance and viability as the overriding regulatory framework, however this should be complimented by resident/tenant satisfaction measure(s) that considers the nature of the housing provided (general needs vs. specialist supported). Holding these three interrelated measures in balance would ensure quality of service, care, support, and sustainability. Additionally, more scrutiny should be put into how Housing Associations are positively investing and

producing positive impact in their local communities and not just with tenants in their own housing stock. The neighbourhood standard is a good step in this scrutiny, but it needs more enforcement.

At the same time, as an already highly regulated organisation we would want any additional expectations on exempt accommodation to be proportional and aligned with those of existing regulatory frameworks

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

The roles are clear on paper, but the relationship could be clarified, not least if any tenant satisfaction regulatory matters are introduced. That would mean that the reporting of resident satisfaction would also consider compliments, complaints, and suggestion handling.

We would also like it noted that alongside the role of the RSH and Ombudsman is the role of the Charity Commission (CC). The CC have primary reporting areas such as safeguarding (which has an overlap into the Ombudsman area of accountability) clarity about how these reporting areas will work in practice would be helpful.

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

As an association that has had interactions with the regulator in the past, we believe the regulator has sufficient powers however, on occasions, not least with smaller (for profit providers) these enforcement powers are slow to be used.

Our experience has been that there are areas of the UK where we operate where for-profit providers have sought to enter the market, providing an, initially, attractive offer. However, over time has shown that they are in the market to make profit, earned out of providing a minimal level of care which in the short term can have the impact of forcing out the not-for-profit services. We are not aware of these services having any regulatory intervention.

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

The Social Housing white paper has introduced a new, welcome additional focus on tenant/resident engagement. As a supported housing provider, we already have an excellent knowledge of our residents given the level of staff engagement our staff have daily.

Given the importance of good engagement, we would suggest the existing regulatory framework that primarily focuses on governance and viability, is balanced up by tenant engagement/satisfaction reporting.

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

As noted above, we are committed to providing a quality environment for the young and vulnerable residents we accommodate.

Decent Homes has been a useful 'tick list' through which we can provide evidence at a basic level of compliance however, an accommodation needs to be made for the range of types of stock, not least from specialist supported providers who provide a vital service but in a quite different context. For example, our largest hostel in Walthamstow is home to 180 people and so the delivery of decent homes for them on a superficial level is straightforward but providing ensuring a 180-home tower block requires a different nuance to ensure it truly is a decent home.

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

We absolutely believe that anyone looking to provide social housing should be required to register and demonstrate compliance. More than this we believe that anyone providing social housing business should be a not for profit or social enterprise and not a 'for profit' provider.

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