

Developing a modern regulatory framework for housing associations in Wales

A consultation response from Cymorth Cymru

July 2009

Cymorth Cymru is the representative body for providers of housing-related support, homelessness and supported living services in Wales and as such has three overarching objectives:

- To improve the links between policy and practice by ensuring that those working in frontline service delivery understand and are influenced by the wider policy context, and those working in policy development understand and are influenced by the experiences and knowledge of those working on the ground.
- To ensure that the sector maximises its contribution to the lives of citizens and the communities in which they live, by helping to build and develop the sector's capacity and professionalism.
- To increase public understanding and support for the sector and the work it does in helping people build the lives they aspire to within the community.

1 Introduction

Cymorth Cymru welcomes the Welsh Assembly Government's review of the regulatory framework for housing associations in Wales. Our response to the consultation document has been formulated in consultation with our membership, including discussion at our Open Forum.

2 Comments

Cymorth supports the range of core principles outlined in the consultation document, and agrees that the framework must be established in such a way that these principles are upheld. However, we are uncertain that the current document satisfactorily reflects all of the core principles described, particularly with regards to driving a citizen-focused, strategic (rather than resource-led) approach.

Other general comments made by our members concern the positioning of the framework in the wider housing agenda. For example, despite making clear housing associations' accountability to tenants, regulators and lenders, the document appears to take only limited account of wider stakeholders, such as managing agents and support providers. In addition, housing associations have key roles to play in addressing national and local Supporting People and homelessness agendas, though these functions are also not fully reflected in the draft framework.

Assessments need to include consideration of housing associations' accountability to *all* partners and stakeholders, and the central roles they play in supporting wider social policy agendas. If the framework were amended to take account of this, it would benefit a wider range of citizens, including those in greatest housing and support need.

Finally, concerns were expressed that the regulatory framework must be applied in a manner which is fair and proportionate, taking into account the variable sizes and differing roles of housing associations in Wales. In particular, smaller associations are concerned that, whilst endeavouring fully to comply with the principles described within the framework, the administrative burden of compliance with regulatory requirements must be proportional to that of larger organisations. In addition, any new arrangements must also be fully applicable to specialist housing associations working with specific client groups, such as homeless people or those affected by learning disabilities or other support needs.

3 Conclusion

- 3.1 The principles of partnership and accountability which inform the draft framework are welcomed by Cymorth, though we take the position that they must be extended to include housing associations' relationships with:

- Local authority Supporting People teams, housing departments and homelessness services
- Housing-related support providers, and
- Managing agents

Housing associations' accountability to these partners should also be reflected in the regulatory framework.

3.2 The reach of the framework should be extended to support the key roles that housing associations play in the delivery of key social policy agendas, particularly:

- The 10-year Homelessness Plan, and
- The Supporting People Strategy

3.3 The revised regulatory frameworks should reflect the range and nature of all housing associations in Wales, and be relevant to all. Smaller organisations may be disproportionately burdened by some requirements than larger, better-resourced associations, and this must be taken into account. In addition, compliance with revised systems may also have training implications for those involved, and this too must be fully considered.

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