

Amanda Newton
Statutory Consultation Project Manager
The Social Housing Regulator
Fourth Floor
One Piccadilly Gardens
Manchester M1 1RG

08th February 2012

Dear Ms Newton,

YMCA England response to consultation on revised regulatory framework for social housing in England

The YMCA is one of the largest voluntary sector providers of supported housing in the country with over 7,000 young men and women every night staying in YMCA accommodation. The YMCA was established in 1844 and there are 135 YMCAs across England serving over 250 different communities.

Following the publication of the Government's consultation, the YMCA national body, YMCA England, carried out a consultation on the proposals across all YMCAs. Their comments and feedback form the basis of this response.

General comments

Broadly YMCA England supports the proposed changes as outlined in the consultation. Some of the proposed regulatory framework is difficult to apply to individual YMCAs because on a local level they are small providers of short term supported accommodation. Overall the new framework looks more straightforward than the current one and should support housing associations in running their businesses effectively.

YMCA England is in support and would agree with the proposed questions which the consultation outlines and has made comments on questions **3, 5 and 8**.

3: Does the revised Value for Money standard:

- Give providers sufficient flexibility to run their businesses?

As YMCAs work on an individual and local level, the language in the proposals can be quite prescriptive and burdensome for some small Housing Associations. Whilst there should be



direction set out in the revised regulatory framework by TSA, YMCA England believes that this may not give us sufficient flexibility to run our businesses when many of the proposals will be more appropriately targeted towards large housing associations.

The specific expectations as listed are, as with most TSA guidance and directives, aimed at large general needs associations. The specific expectations (as shown on pages 21 and 22 of the consultation document) are many and not all totally relevant to a small RSL. For instance, "an understanding of the return on its assets, and a strategy for maximising the future returns on assets, measured against the organisation's purpose and objectives." We always ensure that our services meet our purposes and objectives. However we operate a number of small hostel services (16) the majority of which have fewer than 15 beds. These services are structured to meet the needs of our local authority partners and we can only accept referrals from these local authorities. There is no scope for us to seek alternative uses to maximise future returns. If there were scope for change it is unlikely that those alternative uses would be to the benefit of our vulnerable customers.

- Enable the regulator to provide adequate protection to taxpayers' interests, and to maintain the confidence of lenders and stakeholders in the regulator's economic role?

YMCA England believes that it does enable the regulator to provide protection to taxpayers' interests but it does so at a cost and as previously said can be both very prescriptive and burdensome for small housing associations. YMCA England would point again to the specific expectations as shown on pages 21 and 22 of the consultation document. *These specifications are long winded and written in language that is not easy to follow. It is subjective and includes requirements that are laudable, but not practical in the specific circumstances of small RSLs. It would not be easy for YMCAs to provide the evidence the specifications require as most are not of relevance to small RSLs, particularly bearing in mind our funding regimes. A more objective approach would be better.*

- Express requirements of providers in a way that is clear, succinct and as outcome focussed as possible?

The proposals as set out focus on the extensive amount of written detail it expects from YMCAs' Boards, rather than actually ensuring value for money is achieved through the work we do. YMCA would argue that the detail in this section is far from succinct and in places is intrusive, subjective and is done so in a prescriptive manner.

5: Does the revised Tenant Involvement and Empowerment standard:

- Effectively take into account the Government's direction to the regulator and amendments required by the Localism Act?

It does, however the tenant cash back scheme in relation to the provision of maintenance services is of concern to YMCA England. As a small specialist supported housing association, all of our tenants have high levels of support needs. Also, we have a very high throughput, with tenants staying between 3 and 24 months. These two issues make a workable, and safe, tenant cash back scheme very problematic. In practice with such a short average length of tenancy we will find it difficult to meet the Tenant Involvement and Empowerment Standard albeit that the Standard sits well with our general ethos of enabling young people.



A number of specific expectations within this standard seem to be designed with general needs associations in mind. We are committed to the principle of tenant panels, but consideration should be given to supported provision, and the additional challenges that they face.

8: Does the revised Neighbourhood and community standard:

- Express requirements of providers in a way that is clear, succinct and as outcome focussed as possible?

Yes. However, as with other standards, it is more relevant to larger general needs associations, not to smaller, or supported, associations such as YMCAs.

Yours faithfully,

Ian Green
Chief Executive

