



## **Homes for Cathy Submission to the Levelling Up, Housing & Communities Select Committee Inquiry on the Regulation of Social Housing**

*December 2021*

### **Introduction**

Homes for Cathy is an alliance of 117 organisations formed of 93 housing associations, 23 homelessness charities and one local authority, all of which share the joint ambition of ending homelessness. The group was formed in 2016 to mark the 50<sup>th</sup> anniversary of the TV film *Cathy Come Home*, when a small group of housing associations came together to raise awareness of the ongoing needs of homeless people and call for housing associations to do more to solve the homelessness crisis. Alongside a director from the homelessness charity Crisis, our board is made up of five CEOs from housing associations with a particular concern to fulfil their original social purpose to house homeless people (BCHA, Broadland, Hightown, SYHA and Wandle).

The group worked closely with the homelessness charity Crisis to develop the Homes for Cathy commitments, a set of nine 'best practice' pledges that inform members' policies, practices and provision relating to ending homelessness. Although these commitments are aspirational - members are not currently audited against them - they are used by many members to develop and implement homelessness action plans across their organisations. Moreover, they act as a benchmark for progress on their work to tackle homelessness and by which their boards can hold them to account. The nine commitments<sup>1</sup> are as follows:

1. To contribute to the development and execution of local authority homelessness strategies.
2. To operate flexible allocations and eligibility policies which allow individual applicants' unique set of circumstances and housing history to be considered.
3. To offer constructive solutions to applicants who aren't deemed eligible for an offer of a home.
4. To not make any tenant seeking to prevent their homelessness, homeless (as defined by the Crisis plan definition).
5. To commit to meeting the needs of vulnerable tenant groups.
6. To work in partnership to provide a range of affordable housing options which meet the needs of all homeless people in their local communities.
7. To ensure that properties offered to homeless people should be ready to move into.
8. To contribute to ending migrant homelessness in the areas Housing Associations operate.
9. To lobby, challenge and inspire others to support ending homelessness.

Homes for Cathy organises regular workshops for members to share knowledge and best practice around meeting the commitments, tackling a range of subjects including reducing evictions, maintaining flexible allocations and eligibility policies, offering furnished tenancies to people experiencing homelessness and working in partnership with local authorities to deliver initiatives such as Housing First. Homes for Cathy also facilitates regional events, hosted by members, to galvanise action at local level, uniting stakeholders from housing associations, local government and charities to address local challenges and solutions to ending homelessness.

## Summary

The appetite among Homes for Cathy housing association members to play their part in ending homelessness is clear. However, Homes for Cathy believes that more needs to be – and can be – done by the housing sector as a whole. According to Shelter's latest analysis<sup>2</sup> of official rough-sleeping and temporary accommodation figures, one in every 206 people in England is currently without a home. Of these, 2,700 people are sleeping rough on any given night, nearly 15,000 single people are in direct access hostels and nearly 250,000 people are living in temporary accommodation – most of whom are families. Meanwhile, new research by the National Housing Federation<sup>3</sup> indicates that 283,000 children are living with their families in other people's homes – effectively homeless – as their families cannot afford a home of their own.

In order to galvanise housing associations to address the magnitude of this issue, the Homes for Cathy group believes that the Regulator should have a role in measuring and monitoring the social impact of housing associations, in particular their success in housing homeless individuals and families. Our belief is 'what gets measured gets done'.

In relation to the above, our submission seeks to address the following points set out in the inquiry's terms of reference:

- Is the current regime for regulating social housing fit for purpose?
- Will the reforms proposed in the social housing White Paper improve the regime?

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

Homes for Cathy ascertains that the current regulatory regime does little to encourage housing associations to play a part in tackling the homelessness crisis.

Our view is backed up by the data on housing associations' allocations to homeless households<sup>4</sup>. In 2020/21 (Apr-Sep) there were 76,000 new social housing lettings, 60,595 (79%) of which were made by Private Registered Providers (PRPs) and 15,863 (21%) of which were made by local authorities<sup>1</sup>. Only 32% of households starting a new social tenancy in 2020/21 (Apr-Sep) were existing social tenants renewing or transferring within the sector – 68% entered from outside the sector. Of these, only 16,000 new social lettings were made to “statutorily homeless” households (Apr-Sep), equating to just 21% of all social lettings in the period.

Without regulation, there is little incentive for housing associations to improve on these figures. In contrast, in Scotland, registered providers are monitored on their progress in housing homeless households. As part of the Scottish Housing Regulator's (SHR) assessments<sup>5</sup>, they examine not only how local authorities and RSLs provide settled accommodation, but also how they help people to sustain their tenancy. The SHR has developed indicators in its annual Charter return to support this. The success of this approach is backed up by data on Scottish social housing providers' lettings to homeless households; in 2019/20, 44% of social housing lettings in Scotland were allocated to people experiencing homelessness<sup>6</sup>.

Our view is supported by the findings of the recent Kerslake Commission on Rough Sleeping<sup>7</sup>, the final report of which makes a recommendation for the role of Regulator to monitor housing associations' efforts to address homelessness, stating:

“Housing associations are not public bodies, and therefore do not have a legal duty to address homelessness. However, housing associations do have a social responsibility, and an important role to play in the provision of secure and safe accommodation, and support for people who are

homeless or at risk of homelessness. The Commission is calling on the housing sector to drive forward a commitment to collaborate with Local Authorities and other public agencies, to prevent and relieve homelessness, and help develop solutions and strategies. To incentivise housing associations to prevent and contribute to homelessness solutions, the Regulator of Social Housing should monitor performance in this area.”

In addition to the above, we believe that housing associations could be monitored by the Regulator in terms of their activity on homelessness prevention among existing tenants. For example, we know that many of our members have done excellent work to drive down evictions, through adopting a cultural change within their organisations, introducing more 'person-centred' approaches around rent arrears and investing in tenancy sustainment schemes to help vulnerable tenants access grants and unclaimed welfare benefits. As in Scotland, tenancy sustainment could be a performance indicator to benchmark housing associations' homelessness work.

### **Will the reforms proposed in the social housing White Paper improve the regime?**

Although Homes for Cathy welcomes the Regulator’s new consumer protection role, we believe it could be extended to represent the interests and needs of people experiencing or at risk of homelessness.

We recommend that the Select Committee calls on Government and the Regulator to monitor housing associations on their progress in preventing and alleviating homelessness. This could be achieved by the Regulator gathering data on the following indicators:

- The number of nominations for homeless households made by a local authority, the percentage that result in an offer, and the percentage of those offers that result in a letting.
- The percentage of new tenancies sustained for more than a year, by source of let (for example applicants who have been assessed as statutory homeless by the local authority).
- The number and outcome of evictions (again, this could be broken down by source of let).

In addition to the capturing of the data outlined above, we recommend that the Regulator publishes a code of practice to encourage housing associations to consider their policies, procedures and practices around homelessness, mirroring the Homes for Cathy commitments that our member organisations currently adopt, encouraging providers to:

- Contribute to the development and execution of local authority homelessness strategies – as stated in the Kerslake Commission's final report, housing associations must demonstrate a commitment to collaborate with local authorities and other public agencies, to prevent and relieve homelessness, and help develop solutions and strategies.
- Operate flexible allocations and eligibility policies which allow individual applicants' unique set of circumstances and housing history to be considered - while responsibility for setting eligibility criteria for the housing register generally sits with the local authority, individual housing associations' policies can create barriers to allocations, which housing associations can seek to remove.
- Offer constructive solutions to applicants who aren't deemed eligible for an offer of a home - housing associations should offer a constructive and supportive approach to mitigate the perceived risk of tenancy failure, for example through tenancy training.
- Not make any tenant seeking to prevent their homelessness, homeless – housing associations should proactively provide their tenants with quick access to effective tenancy support services and operate flexible 'person centred' rent arrears policies.

- Commit to meeting the needs of vulnerable tenant groups – for example young people, people leaving institutions such as the armed forces, hospital, the care system or prison and people experiencing domestic abuse.
- Ensure that properties offered to homeless people should be ready to move into – a lack of furniture, white goods, carpets and curtains in properties can deter people on low incomes from accepting them and push them towards renting in the private sector, with higher rents and less security.

**For more information, please contact:**

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**Sources:**

<sup>1</sup> <https://homesforcathy.org.uk/commitments/>

<sup>2</sup> [https://england.shelter.org.uk/media/press\\_release/274000\\_people\\_in\\_england\\_are\\_homeless\\_with\\_thousands\\_more\\_likely\\_to\\_lose\\_their\\_homes](https://england.shelter.org.uk/media/press_release/274000_people_in_england_are_homeless_with_thousands_more_likely_to_lose_their_homes)

<sup>3</sup> <https://www.housing.org.uk/news-and-blogs/news/1-in-5-children-need-new-home/>

<sup>4</sup> MHCLG Statistical Release: Housing Social Housing Lettings: April to September 2020, England

<sup>5</sup> <https://www.housingregulator.gov.scot/for-landlords/advisory-guidance/technical-guidance/how-to-complete-your-annual-return-on-the-charter-arc-2021-return> (see sections 16, 22 & 23)

<sup>6</sup> UK Housing Review 2021

<sup>7</sup> <https://www.commissiononroughsleeping.org/>