

Guidance on Notifiable events for Registered Social Landlords

Community Housing Cymru Group Consultation response

About Us

The Community Housing Cymru Group (CHC Group) is the representative body for housing associations and community mutuals in Wales, which are all not-for profit organisations. Our members provide over 155,000 homes and related housing services across Wales. In 2012/13, our members directly employed 8,000 people and spent over £1bn in the Welsh economy.¹ Our members work closely with local government, third sector organisations and the Welsh Government to provide a range of services in communities across Wales.

Our objectives are to:

- Be the leading voice of the social housing sector.
- Promote the social housing sector in Wales.
- Promote the relief of financial hardship through the sector's provision of low cost social housing.
- Provide services, education, training, information, advice and support to members.
- Encourage and facilitate the provision, construction, improvement and management of low cost social housing by housing associations in Wales.

¹ Measuring the Economic Impact of Welsh Housing Associations, November 2013



In 2010, CHC formed a group structure with Care & Repair Cymru and CREW Regeneration Wales in order to jointly champion not-for-profit housing, care and regeneration.

Key Issues

CHC has always rejected the idea of having a list of notifiable events as part of the new regulatory framework for Wales. Discussion on this issue first took place under the previous Head of Regulation who was responsible for developing the new Regulatory Framework. It was decided at this time that having a list was inconsistent with co-regulation and the principles of relationship management.

We are aware that co-regulation is still an aspiration and we are working with Welsh Government as part of the Advisory Groups to ensure that the new regulatory framework for Wales is implemented as originally intended and that regulation of housing associations is proportionate and risk-based.

We are pleased that some RSLs have taken a proactive approach to informing the regulator about potential risks. However, CHC is aware of regulatory concerns that this approach has not been adopted by all RSLs.

If co-regulation was working effectively, then the regulator would be aware of these issues at an early stage (through its work and understanding of the RSL) which would allow problems to be tackled head on and hopefully prevent any escalation of these. If the regulator felt that an individual housing association was not buying into the relationship management approach, it should be tackled on an individual basis.

CHC feels strongly that having a list undermines the responsibilities of board members and officers who are charged with exercising responsible governance.

CHC has voiced its concerns about this consultation through the Advisory Groups which has also been documented. We firmly believe that the proposed approach is unnecessary and overly prescriptive.

The detail in the consultation paper around the scope of what is deemed to constitute a notifiable event is of particular concern and we anticipate daily submissions to the regulator from members if this is adopted. It also raises questions about the capacity (and desirability) of regulators to both view and keep under review the inevitable quantity of information that could be provided. Having to submit such levels of detail will also be an additional administrative burden for associations which is hard to justify.

Community Housing Cymru Group Members:
Aelodau Grŵp Cartrefi Cymunedol Cymru:



crew



It is disappointing, for lots of reasons, that the regulator has felt the need to proceed with this consultation but we hope that CHC's views and those of the sector will be reflected in decisions about what happens moving forward.

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