1. We welcome the opportunity to comment on the above Bill. Home Scotland manages 2,861 general needs properties, 133 sheltered properties, and 56 non social housing properties in Scotland. Across the UK, Home manages a total of 52,000 properties.

2. Home is structured as two distinct business streams: housing operations and care & support. It delivers its services under the name ‘Home’, with the following variations for some services:

   - Home Scotland – services in Scotland,
   - Stonham, part of Home – care & support services,
   - Live Smart @ Home – mid-market products,
   - Nashayman, part of Home – specialist BME housing services in West Yorkshire and wider consultancy services,
   - Copeland Homes, part of Home – services in relation to the former local authority housing in Copeland, West Cumbria.

3. Home's legal structure comprises:

   - Home Group Limited, a registered charitable housing association embracing most of the housing operations business stream and all of the care & support business stream referred to above,
   - Home in Scotland Limited, a Scottish registered subsidiary undertaking Home’s housing operations in Scotland,
   - Live Smart @ Home Limited: a subsidiary company limited by shares providing mid-market products,
   - Home Group Developments Limited: a subsidiary company limited by shares which acts as a development vehicle for Home.

4. We work with a broad customer base spanning rented, factored properties and shared ownership housing, and floating and specialist care and support services. Our role is to provide decent homes in healthy neighbourhoods and excellent personalised care and support services.

Modernising regulation

5. All sectors are much more focused on the needs and desires of customers. Whilst recognising the need to get the basics right, choice is now paramount and there is a growing expectation that products and services should be ‘personalised’ and deliver the best value for money. Increased access to more diverse sources of information mean that these expectations are rapidly rising. Home seeks to be at the forefront of this approach, and our new Strategy, ‘Opening Doors’ sets out our offer of:

   - Using our size and concentration of operation across both general purpose housing and care and support to offer the most competitive value for money for our customers and clients through a range of approaches including large scale procurement; and
Being more strongly customer driven and offering a wider and more relevant range of choice of products and services.

6. We believe that this approach will enable us to offer the best quality services to our customers and clients and seek to continuously challenge ourselves to improve. We welcome the modernised system of regulation set out in the Housing Bill as we believe that it responds to this changing environment and our current strategy in the following ways:

- Standards will be designed to reflect what matters to customers and complemented by local outcomes set in consultation with customers meaning they will be clear about what they can expect. They will therefore be empowered to influence the way that their housing is managed and hold their landlord to account when they are failing to deliver excellent services that deliver value for money.
- The strong focus on customer engagement in regulation reflects our aim to build on our existing good relationships with customers and clients, capturing their feedback and insights and translating this into actionable improvements.
- The Scottish Housing Charter will set out in general terms the national outcomes that landlords should be delivering but give discretion to landlords to decide how they deliver the outcomes. This will give Home the flexibility to offer a more differentiated service to customers whilst continuing to focus on delivering consistent and excellent levels of service in terms of ‘the basics’.
- Light touch regulation with reduced levels of red-tape and intervention targeted at those organisations who are performing poorly will provide further incentives to landlords to continuously challenge themselves to improve and will free up the best performing to consider innovative ways to provide better services to customers that exceed the regulatory minimum.
- The independent nature of the Regulator will enable an objective approach to performance measurement. Clear standards will ensure that areas where landlords are not performing well can be easily identified and best practice can be shared. This should drive up standards in the sector. Landlords will also be able to easily identify the areas in which they need to improve.

7. At the same time some key challenges emerge from the Bill which must be addressed such as:

- We feel that the proposed regulatory reforms have the potential to put customers at the heart of regulation. However, if the vision is to become reality a key challenge will be to build the capacity of customers to fully participate in the process of defining and scrutinising national and local standards. The regulator should have a role in this capacity building, for example providing training to customers to enable them to carry out effective evaluation of their landlord’s services.
- The ability of landlords and customers to set local standards and define how to measure national standards will mean some diversity in the
information collected. The Regulator will need to ensure that clear guidance is provided when gathering performance information to ensure that ‘like for like’ comparisons are being made.

- The Regulator will need to ensure that the final outcomes set are measurable and that robust information can be gathered to evidence how landlords are meeting outcomes.
- The Regulator will be expected to continually review and challenge the outcomes contained within the Scottish Housing Charter to ensure that standards and performance continue to improve.
- Whilst we welcome the idea of proportionate intervention, clear guidance will be needed from the Regulator about how and under what circumstances it would exercise its powers.
- Whilst the Bill only makes suggestions about the areas of performance that might be measured by the Charter, we hope that the final Charter will reflect the ambitions of the Bill to safeguard and promote the interests of customers. Currently, there are some noticeable omissions to this such as measuring value for money and levels of customer involvement.

8. We feel that much could be learnt from Home’s experience of the new regulatory framework for social housing in England and can bring particular insights around setting local standards with customers and clients from our participation in the TSA’s Local Standard Pilots.

**Abolishing Right to Buy**

9. Home supports flexible housing tenure throughout the lifetime of any customers’ engagement with us. This might for example include us exploring ways of:

- Changing the tenure of an individual property over time in order to meet the needs of individual customers; or
- Supporting a customer to move between houses of different tenure types.

10. However in doing so we would be keen to protect access to social housing for future customers. We therefore believe that it is important to work in partnership with others to reform and co-create new models to meet need – delivering increasingly tailored products, greater choice and positive economic outcomes to our customers. As local authorities, their partners and local communities are given much more flexibility to make decisions based on local needs and priorities, these models should deliver tailored outcomes for individual places that fulfil our aim to build strong, healthy and sustainable communities. This will require reciprocal arrangements from government that allow us the freedom to work innovatively, to take risks and to be pioneering in our approaches as well as flexibility around borrowing to maximise the use of our assets whether this be through special purpose vehicles, local bonds or other mechanisms.

Home Groups Limited
4 March 2010