

[Homes and Communities Agency - introducing fees for social housing regulation](#)

Online submission form

Questions:

- 1. Do you agree with our proposals for those regulatory costs which apply to all providers to be funded by fees?**

No

We echo the view of the National Housing Federation in their concern that this proposal is wrong in principle because it transfers the cost burden from general taxation to individual not-for-profit organisations.

As a charity providing a range of different services for older people, our housing association arm is just part of what we do, as we also provide cares homes and community services. This means we already facing the transfer of the costs of the CQC inspection regime, which will be fully funded by providers in the next few years. Recent changes in charity law also mean we are facing new costs for fundraising regulation.

While we recognise the value of independent regulation, it's disappointing that the HCA has chosen this path.

- 2. Do you agree with our proposed commitments to limiting annual increases in fees overall?**

Yes

It would be helpful to limit annual increases and review in a timely away.

- 3. Do you agree with our proposal to keep regulatory costs to a minimum? What further steps can/should be taken to avoid fee inflation?**

Yes

We would expect any regulator to operate as efficiently as possible and keep costs to a minimum, regardless whether this is funded by taxation or provider fees.

- 4. Do you agree with our proposal for a one-off fixed initial registration fee with part of the costs of registration, including unsuccessful applications, funded through grant-in-aid?**

No strong view

- 5. Do you agree with the proposed initial registration fee level of £2,500?**

No strong view

- 6. Do you agree it is appropriate that the annual fee should be based on social housing units owned?**

Yes

Although as a small provider this will not apply to us, given the options it seems a straightforward way to proceed.

7. Do you agree with the proposed definition of units as social housing where the private registered provider is the owner?

Yes

8. Do you agree with our proposals for a fixed fee for providers that own fewer than 1,000 units?

Yes

As a small provider we welcome this.

9. Do you agree with the proposed fixed fee level of £300?

Yes

10. Do you agree with our proposal to charge fees at the group parent level where the parent is registered?

Yes

This is a pragmatic approach.

11. Do you agree with our proposed approach to the annual fee when a provider is only on the register for a proportion of the year?

Yes

12. Do you agree with the proposed content for the annual fees statement?

Yes

13. Do you agree that existing stakeholder engagement activities are sufficient for once fees are introduced?

It would be helpful to have a clear mechanism for providers to respond to the annual fees statement, particularly in relation to the HCA's business planning priorities. While we recognise the importance of independence of the HCA it also needs to be able to hear the view of its funders.

14. Do you have any comments on our business engagement assessment including in relation to equality and diversity?

No

15. Do you agree with the proposed arrangements for invoicing and collection?

Yes, in theory but it is very late in the business planning year for introduction of fees by April 2017.

16. Do you agree with the proposed arrangements for addressing non-payment of fees?

Yes in theory, but some flexibility in year one would be helpful, because of the short timescale and as it a new cost.

17. Do you agree with the proposals for resolving issues on fees calculations?

Yes