

Cynulliad Cenedlaethol Cymru / National Assembly for Wales  
Y Pwyllgor Cyfrifon Cyhoeddus / Public Accounts Committee  
Ymchwiliad i drefn reoleiddio Cymdeithasau Tai / Inquiry into Regulatory oversight of Housing Associations  
Ymateb gan Tai Pawb / Evidence from Tai Pawb

**A** **Who we are**

a.1 Tai Pawb (housing for all) is a registered charity and a company limited by guarantee. The organisation's mission is, "To promote equality and social justice in housing in Wales". It operates a membership system which is open to local authorities, registered social landlords, third (voluntary) sector organisations, other housing interests and individuals.

**B** **What we do**

b.1 Tai Pawb works closely with the Welsh Assembly Government and other key partners on national housing strategies and key working groups, to ensure that equality is an inherent consideration in national strategic development and implementation. The organisation also provides practical advice and assistance to its members on a range of equality and diversity issues in housing and related services.

**C** **Tai Pawb's vision is to be:**

c.1 The primary driver in the promotion of equality and diversity in housing, leading to the reduction of prejudice and disadvantage, as well as changing lives for the better.

c.2 A valued partner who supports housing providers and services to recognise, respect and respond appropriately to the diversity of housing needs and characteristics of people living in Wales, including those who are vulnerable and marginalised.

c.3 For further information visit: [www.taipawb.org](http://www.taipawb.org)

c.4 Charity registration no. 1110078

## **1 Introduction**

1.1 Tai Pawb welcomes the opportunity to provide evidence to the Public Accounts Committee in relation to its inquiry into the regulatory oversight of housing associations, we would also like to extend our thanks to the committee in granting an extension in relation to the submission of this evidence.

1.2 This response is predicated on our knowledge and expertise in the equality and housing policy and legislation of Wales supplemented by our practical expert knowledge of working within the Welsh housing sector providing equality support to that sector for over ten years as the foremost leaders in the field of equality and housing in Wales.

## **2 General Comments**

2.1 Tai Pawb continues to support the development of Welsh housing and equality policies, legislation, and practices. We work with our members and key stakeholders to ensure that equality and diversity, and social justice principles are at the heart of housing in Wales.

## **3 The effectiveness of the current Regulatory Framework for Housing Associations Registered in Wales**

3.1 When the new regulatory framework for housing associations in Wales was developed in 2011, it was done so on the basis of cooperation and coproduction involving Welsh Ministers, housing associations, tenants, and organisations like ourselves who work closely with the housing sector in Wales. We would like to take this opportunity to state that we very much appreciated this approach at the time and we appreciate the continued close collaboration with the Regulation Team.

3.2 The initial approach was revisited and developed further over the intervening time. The aim of doing so has been to improve the risk based and tenant centred approach. Tai Pawb welcomes the work undertaken so far and the continued commitment to ensure that through the tenant centred approach equality and diversity remains a high priority for the regulator.

3.3 Tai Pawb has worked closely with the regulator over the years, including providing advice to the regulation team on approaches to equality and diversity via advisory groups and beyond and supporting the sector to improve their equality and diversity practices. Our latest development, QED Award, which is a quality mark for housing providers, enables housing providers to show their commitment and effectiveness in relation to equality and diversity. In developing the mark, we appreciated collaboration with the regulation team in order to ensure that the mark meets regulatory requirements related to equality and diversity. It is our aim that QED Award will further strengthen the work of the regulator in the promotion of equality and diversity within the sector. We look forward to working with members of Tai Pawb and colleagues within the housing regulation team over the coming years in, and assisting with the planned review of effectiveness of the approach in 2018/19 (after the first complete cycle of operation).

3.4 Organisationally, we have seen housing association members of Tai Pawb proactively seeking training in relation to equality and diversity, and equality impact assessments for both staff and board members. In addition our members will utilise our members helpline for (non-legal) advice and information, and members are also keen to utilise us for policy reviews. This is certainly in part due to the tenant centred approach of regulation and the emphasis on equality, diversity, and access to services contained within the regulation process.

#### **4 The effectiveness and quality of governance arrangements**

4.1 During 2016/17 Tai Pawb worked closely with the Regulation Team to update their process for equality monitoring of board members in Wales. The team took on board our recommendations and have implemented comprehensive data collection which includes all the protected characteristics as defined in the Equality Act (2010). We welcome this change to equality monitoring and are looking forward to the publication of the equality monitoring data and expected longer term improvements in organisations related to board diversity as well as continued work with the team in relation to this in the coming financial year and beyond.

4.2 Tai Pawb continues to work to provide high quality advice, information and training in relation to equality and housing issues across the housing sector in Wales. We are pleased to see an increased interest and uptake in equality and diversity training for board members. We have noted that some organisations will make this training a pre-requisite as part of the induction of new members, and there is an approach within the sector to ensure that this knowledge is kept up to date. We continue to work with the sector to ensure they follow this path of continued improvement and that the good practice is replicated as much as possible across the sector.

4.3 We welcome the commitment to Community Housing Cymru's Code of Governance and are proud to be project partners on the Come on Board – which seeks to improve the calibre and diversity of board members for housing associations in Wales.

## **5 Whether the current regulatory regime is effective in managing and mitigating sector wide risks**

5.1 The regulation team produced a report in 2016 highlighting the sector risks which was aimed at informing and support management at board level. This was a proactive approach which we welcomed. We also welcomed the approach taken in relation to this piece of work which was to work with

housing providers and other organisations, such as ourselves, to help identify these risks. We feel this approach should be continued. We feel it is of particular importance to ensure that the voice of organisations which can highlight risks in connection with equality and diversity is heard – noting that currently there are two major pieces of work being undertaken in the field of disability and housing by the Wales Audit Office and the Equality and Human Rights Commission respectively. We believe there is a potential for risks linked to equality and diversity to become more prominent over the coming period both in connection to the impact of welfare reform on certain groups of people, EU referendum and in connection to any findings from the research previously mentioned. Understanding the impact of these on certain groups of people will help housing identify and target actions to mitigate these ensuring the best use of resources and reduction of the potential overall risk effect.

## **6 The effectiveness of the co-regulatory approach in practice**

6.1 Tai Pawb welcomes the ethos of a co-regulatory approach based on the recognition of joint accountability. We welcome the opportunity to have input into the regulatory process with sector involvement at high level meetings, an approach which has had demonstrable benefits for all involved.

## **7 The remuneration levels of senior staff members of housing associations**

7.1 While we recognise the housing sector and housing associations in Wales in particular are facing unprecedented operational environmental challenges, we also acknowledge that the remuneration level of senior staff members of housing associations in Wales can be a contentious and complex area for consideration. While we do not have a specific comment in relation to remuneration for the sector we would like to highlight the connected area of senior staff members' diversity in the sector.

7.2 We noted earlier that improvement has been made in board equality monitoring used by the regulator in Wales to facilitate greater board

diversity. We would welcome a similar approach to facilitate greater diversity in staff leadership.

## **8**

### **Additional comments**

8.1 Housing associations in Wales continue to make a significant difference to the lives of some of the most vulnerable people. They are working in an operating environment which continues to be challenging for a number of reasons including reclassification and welfare reform. This often results in challenges related to meeting the needs of some of the most vulnerable people in Wales.

8.2 There are unprecedented demands in connection to the need for housing for general needs housing as well as specific housing need related to the needs of, disabled people, older people, under 35's, refugees, survivors of domestic abuse to mention a few. Housing provision in Wales, like in other parts of the UK, needs to change in order to continue providing homes to those in most need. It is in light of these sector pressures and demands equality and diversity considerations become even more prevalent. The continued focus of the housing regulation in Wales to take account of equality and diversity is paramount at this time.