

Jersey Citizens Advice Bureau, St Paul's Community Centre, St Helier, JE2 3WP
25th June 2012

Response to white paper proposals for the transformation of social housing strategy, regulation and delivery.

Foreword

The Bureau is pleased to respond to the proposals as outlined in the 'Achieving Decent Homes' white paper, we saw a 10% increase in the number of client contacts in 2011 and the year to date continues to see a high demand for our services with income support and relationship breakdown being in the top five enquiries. In 2012 the economic climate continues to give policy makers cause for concern and at the Bureau we see how this impacts on individuals and their families. The provision of decent homes is desirable in any society, and we are aware that specific investment and changes to housing strategy in Jersey are overdue. Having considered the contents of the white paper our comments as detailed below.

Proposal 1

Establish a Strategic Housing Unit

The provision of a strategic housing unit and in particular the 'affordable housing gateway' process should provide richer data to inform policy makers in debating long term objectives. Means testing and banding processes should facilitate targeting of resources where required. For the tenant or would be home owner we consider that being part of a single unified application process will provide clarity and direction. The Bureau welcomes the possibility that qualifying criteria may be widened to include those that presently do not qualify for social housing such as single people and couples under 50 who are childless. We commend the recognition to incorporate within future strategy and the need to specifically target the relationship between the residentially qualified sector and non-residentially qualified sector. The Bureau deals with clients from all residential sectors and socio economic groups. However, we receive a higher number of contacts from the non-residential sector. We consider that Data Protection compliant data sharing between the Population Office, Chief Minister's Office and SHU must be considered if the overall objectives of the white paper are to be achieved.

Proposal 2

Create An 'Affordable Housing Regulator'

We suggest that the provision of an independent 'affordable housing regulator' is fundamental to the long term vision as outlined in the white paper, furthermore the provision of a regulator would give protection to the social landlord as well as to the tenant. We do however have some reservations as to which bodies will be regulated and what will happen at this juncture to the non-residentially qualified sector and private rental sector, what level of protection will these parties have going forward.

Proposal 3

A New Wholly States Owned Housing Association

The provision of a states owned **housing association** may concentrate strategy and deliver economic benefits; we note that considerable funding is required to attend to the backlog of maintenance in order to deliver decent homes within the ten year time frame suggested. From the cases that we deal with, we concur with comments in the white paper suggesting that there are strong links between housing standards and the health of the community. We commend the acknowledgement that a strategy is required to facilitate independent living for longer. The Bureau has noted an increase in client contacts in relation to the costs of elderly care; it is particularly poignant where one party in a relationship is no longer able to live at home and the cost of care quickly eradicating savings.

Proposal 4

Transparency In Rents

We understand that it was intended that social housing rents would be set at a '**Fair Rent Level**', this being set at 90% of market rents applicable for the equivalent home in the private rented sector. Subsequently, the fair rent level was to be used as a benchmark to set the housing component payable to income support claimants. Increments to rental over successive years were not applied across the board. The white paper reports that a majority of tenants in the social housing sector who do not qualify for income support are receiving an unintended and hidden subsidy which is not targeted or means tested. We agree that for reasons stated within the white paper it is appropriate that rents should be reset in accordance with the existing Fair Rent Level as originally intended. We suggest, for consideration, that these rental increases are communicated in a clear and concise manner to all tenants who will be affected. The failure of successive governments to implement the strategy as originally intended is not the fault of the benefactors of this windfall. We consider that the means testing involved in rectifying this situation should have an appeals process in place, we also suggest that consideration should be given to creating a team solely dedicated to implementing these changes in order that it may be carried out in as timely and efficient manner as possible. We understand that it is proposed that tenants who receive income support and are not paying the fair rent level will be protected as the housing income support component will be increased to bring about fair rent levels.

From the casework that the Bureau manages, we anticipate that strong resistance from tenants upon this proposal will be forthcoming.

Malcolm Ferey

Chief Executive

Jersey Citizens Advice Bureau Limited

Tel (01534) 871692

Email Malcolm@cab.org.je

Web www.cab.org.je