Overview & Scrutiny

Proposal for a scrutiny review by Living in Hackney Scrutiny Commission - Scoping Document

Report title: Exploring the work of Housing Associations in

Hackney

Municipal year: 2019/20

1. Terms of Reference

1.1 This paper proposes the Commission conducts a review exploring the practices and approaches of different Housing Associations operating in the borough, and the relationship and partnership arrangements between Housing Associations and the Council.

1.2 <u>Core Questions of Review</u>

- How are Housing Associations in the borough working to keep homes safe, decent and in a good state of repair:
 - How do Housing Association monitor and report performance on repairs and maintenance in Hackney, and what is the accountability to local residents and public bodies?
 - How are Housing Associations ensuring they are responsive to Hackney residents' repairs needs?
 - How is the right balance achieved between planned maintenance and reactive repairs, and value for money achieved?
 - What are the views of Housing Association residents in Hackney towards repairs and maintenance?
- How are Housing Associations supporting the Council to best meet housing need and to fulfil homelessness duties:
 - What arrangements are in place between the Council and Housing Associations around the allocation of Housing Association units?
 - How are the arrangements working to best enable the meeting of housing need and homelessness duties in Hackney?
 - What approaches are in place to enable tenancy take up and sustainment in Housing Association units?

- What is the scale and nature of development by Housing Associations in Hackney, and what approaches are providers taking to their existing stock?
 - What approaches are Housing Associations taking to building new homes in the borough, what types of affordable homes are being delivered?
 - What approaches are Housing Associations taking to new tenancies
 - What is the scale of any disposal of affordable housing stock in the borough by Housing Associations, and how effective is the Council's 'Sales Protocol' in preventing the loss of affordable units?

How are Housing Associations fulfilling their social purpose roles in Hackney

- What approaches do Housing Associations have towards wider community investment
- How are housing associations supporting their residents fulfil their potential, and to benefit from opportunity and growth in the borough?
- o In what ways are Housing Associations working in partnership with the Council and other bodies to help promote social, environmental and economic wellbeing in the borough?
- What are the strengths of the mechanisms for partnership working between the Council and Housing Associations, and can they be improved?
 - What are the current arrangements in Hackney and what are the benefits to the Council and Housing Associations?
 - What are the arrangements in some other boroughs, and what can Hackney learn from these?

2. Background

Housing Associations - Government definition

- 2.1 Housing Associations in England are independent societies, bodies of trustees or companies established for the purpose of providing low-cost social housing for people in housing need on a non-profit-making basis.
- 2.2 Many also run shared ownership schemes to help people who cannot afford to buy their own homes outright. Any trading surplus is used to maintain existing homes and to help finance new ones¹.

¹ https://www.gov.uk/guidance/definitions-of-general-housing-terms#housing-associations

Presence in Hackney

- 2.3 Housing Associations play a major role in Hackney.
- 2.4 They manage significant shares of the borough's housing stock around 24,000 homes (the Council manages 32,000 (23,000 social rent and 9,000 leasehold)). All social housing units in the borough are managed either by Housing Associations or the Council.
- 2.5 The size and reach of different Housing Associations vary widely; they include charities with handfuls of units, organisations with less than a 1,000 units focused on very few areas, and providers managing over 100,000 units and operating across the country.
- 2.6 There are approximately 50 Housing Associations operating in Hackney.
- 2.7 The Council is currently updating its records on stock numbers managed by each. However, a <u>presentation by Officers</u> to the Commission's September meeting suggested there are 14 key Housing Associations in terms of Hackney stock managed. These range from Bangla Housing Association with 177 Hackney units, to Peabody with 5620.
- 2.8 In addition to managing existing stock, Housing Associations also receive very large shares of public funding for the delivery of new homes, including that allocated in London by the GLA. In London building activity is largely concentrated among the larger providers; collectively known as the g15.
- 2.9 Despite the Council's ambitious programme for the direct delivery of new homes, Housing Associations are likely to continue to play a vital role in the development and management of housing stock in the borough.

Wider roles

- 2.10 Housing Associations can be influencers on the lives, experiences and life chances of many of our residents, across a range of factors.
- 2.11 Ensuring that homes and neighbourhoods are safe, of good quality, that they are well managed and in a good state of repair can help ensure physical and mental well-being.
- 2.12 Providing effective information and having simple and accessible complaints procedures can enable residents to be involved in the management of their homes, to have their voices heard, and to hold their landlords to account.

- 2.13 Providing relevant and accessible support can enable more vulnerable residents to take up tenancies and remain and flourish within their homes.
- 2.14 Supporting residents to develop their skills can enable more people into good quality employment, securing health and well-being benefits and reducing inequality.
- 2.15 In these ways and others, Housing Associations have broader roles in promoting and enabling social, environmental and economic wellbeing in the areas where they own properties, including through working with the Council's strategic housing function and the local partnership generally. This fits with Housing Associations as social purpose, not for profit organisations.

Regulation and accountability

- 2.16 The fulfilling of these roles are underpinned in part by requirements set down by the relevant regulatory authority (the Regulator of Social Housing), in the form of three 'Economic' and four 'Consumer', Standards.
- 2.17 The 'Economic Standards' cover financial operations and governance aspects, and aim to ensure "a viable sector that is well-governed and efficient to command lender confidence and support delivery of new housing through a combination of private finance and public funding".
- 2.18 The Regulator is tasked with adopting a proactive approach to enforcing these standards.
- 2.19 However, as noted by the Government's <u>2018 Social Housing Green Paper</u>, the regulator's ability to intervene on breaches against a set of 4 'Consumer Standards' has been limited.
- 2.20 These standards cover a number of the areas mentioned by the Commission in its September meeting as possible aspects to explore within a review covering Housing Associations. They include repairs and maintenance, enabling resident involvement, working with local authorities to contribute towards the meeting of housing need and homelessness duties, and playing a role in the achievement of clean and safe neighbourhoods and in promoting social and economic wellbeing.
- 2.21 The Tenant Involvement and Empowerment standard includes a requirement for landlords to provide choice and effective communication of information for tenants on the delivery of all standards (including progress on repairs, performance generally, enabling residents to further develop their capacity to engage, being clear around how residents can and will be involved in the scrutiny of

- performance, and to have a clear, simple and accessible complaints procedure.
- 2.22 The Home standard incorporates standards around repairs (being responsive to tenants' needs, providing choice, having objectives around getting things right first time, having a prudent approach in place which balances maintenance (planned and responsive) and value for money, and which includes responsive and cyclical repairs, planned and capital work, work on empty properties, and adaptations. It also requires registered providers to co-operate with relevant organisations to provide an adaptations service that meets tenants' needs.
- 2.23 The <u>Tenancy standard</u> sets out how registered providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants. They shall demonstrate how their lettings: (a) make the best use of available housing (b) are compatible with the purpose of the housing (c) contribute to local authorities' strategic housing function and sustainable communities There should be clear application, decision-making and appeals processes. This includes co-operating with local authorities' strategic housing function, and their duties to meet identified local housing needs, and providing assistance with local authorities' homelessness duties...including by meeting obligations in nominations agreements.
- 2.24 The <u>Neighbourhood and Community standard</u> sets out obligations around working with others to tackle ASB and to keep communal areas and the wider neighbourhood clean and safe.
- 2.25 It includes a Local Area Co-operation outcome, which sets the need for Registered Providers to co-operate with relevant partners to help promote social, environmental and economic wellbeing in the areas where they own properties. Within this, Providers are expected to identify and publish the roles they are able to play within the areas where they have properties, and to co-operate with local partnership arrangements and strategic housing functions of local authorities where they are able to assist them in achieving their objectives.
- 2.26 That the ability to intervene around these has been more limited, does leave questions to ask about the levels and nature of accountability in place for Housing Associations. The review will explore a number of the elements above, and the ways that Housing Associations are meeting them on in Hackney.
- 2.27 Housing safety particularly for high-rise buildings has been a key area of focus following the Grenfell Tower tragedy in June 2017. This has included the effectiveness of building regulations, compliance with

- them, and the extent to which residents' concerns around safety are listened to and acted upon.
- 2.28 The first phase of the Grenfell Tower public enquiry reported in October 2019. This phase was focused on the background to the fire and the events on the night. The report made 21 recommendations covering the information made available to the fire brigade, the availability of plans for high-rise buildings and the evacuation of the tower.
- 2.29 Phase 2 which is due to start in early 2020 will include a focus on wider regulatory issues. However, some issues relevant to building regulation were also referred to in phase 1.
- 2.30 In particular, the phase 1 report found there was compelling evidence that the refurbishment of the tower which took place between 2012 and 2016, was not compliant with building regulations enacted in 2010. This was in relation to the external wall which had been effectively created with cladding incorporating aluminium composite material (ACM). The report stated there was "compelling evidence that the external walls...failed to comply with...building regulations 2010.... because the walls did not "adequately resist the spread of fire having regard to the height, use and position of the building". Indeed and on the contrary, the walls "actively promoted it".
- 2.31 A separate Review of Building Regulations and Fire Safety led by Dame Judith Hackitt published its final report in May 2018. It examined building and fire safety regulations and related compliance and enforcement with the focus on multi-occupancy high-rise residential buildings.
- 2.32 The Government accepted the Hackitt recommendations and published an implementation plan in December 2018. Its 'Building a Safer Future consultation' in June 2019 detailed how it intended to implement and legislate for the reforms. The changes proposed would apply to all multi-occupied residential buildings of 18 metres (six storeys) and above.
- 2.33 Within the proposals, all eligible buildings would need to be registered with a new regulator, which will issue certificates detailing the work that needs to be done to keep those buildings safe.
- 2.34 They also define a set of 'dutyholders'. These are individuals who will be accountable for a building's safety, over the different stages of a building's lifetime, from construction to the point when people are living in them.
- 2.35 For the occupation phase, an 'accountable person' will be legally responsible for ensuring that 'building safety risks to occupants are reduced so far as is reasonably practicable'.

- 2.36 Within aims to provide 'a stronger voice in the system' the accountable person will also have specific duties to residents. These are intended to enable them to hold those responsible for the safety of their buildings to account, to have better access to information about their building and have more of a say over decisions made about the fire and structural safety of their building.
- 2.37 An accountable person would be a party entitled to receive funds (through rents or service charges) that contribute to the maintenance and upkeep of the building, and not a party separate to this.

Changing nature of Housing Associations

2.38 Housing Associations have traditionally tended to be small to mid-size organisations, providing homes for lower-income or vulnerable groups.

Mergers

- 2.39 However, in recent years there has been a trend of merger activity, with a number of providers joining together to form much larger organisations.
- 2.40 In its September meeting the Commission were advised that key examples affecting Hackney were the merging of Affinity Sutton and Circle to create Clarion, and Family Mosaic joining with Peabody.
- 2.41 Proponents of mergers cite increased efficiency, and the greater ability to raise and release capacity to deliver more new homes and improved and expanded services to residents².
- 2.42 Others voice concern that mergers can move organisations further away from their original purpose of providing low cost housing. There is an argument that they can leave housing providers more remote from the communities they serve, and that principal focus can change from supporting and meeting the needs of residents towards savings and income maximisation³.
- 2.43 The Council's Director of Regeneration advised the Commission in its September meeting that evidence points to smaller, more locally based organisations generally providing a better service to residents.

%20Transcript%20of%20Housing%20Associations%20Thursday%2004-Oct-

² For example: https://www.insidehousing.co.uk/news/news/housing-associations-announce-34000-home-partnership-talks-61196,

 $[\]underline{\text{https://www.insidehousing.co.uk/partner/partner/getting-mergers-right}} \text{/}$

https://www.london.gov.uk/moderngov/documents/b17620/Minutes%20-

^{%20}Appendix%201%20-

^{2018%2014.00%20}Housing%20Commi.pdf?T=9

³ http://www.lipnetwork.org.uk/topics/post/the-recent-wave-of-housing-associations-mega-mergers-have-sparked-the-quest / https://www.insidehousing.co.uk/news/news/notting-hill-genesis-merger-former-chair-to-vote-against-plans-53820

Financial constraint, escalating costs, and impact

- 2.44 Like the Council, Housing Associations have been affected by the requirement for social landlords to reduce rents by 1% annually for four years from April 2016.
- 2.45 It was calculated that by 2020 this would equate to a 12% reduction in average rents, saving Government £1.4 billion, principally in Housing Benefit expenditure.
- 2.46 The reductions have had significant impact on providers of social housing.
- 2.47 For its part, the Council will have 'lost' £41m in rental income over the four years of the reduction (to help put this in context the Council expects a total Housing Revenue Account income of just under £135 million for 2019/20).
- 2.48 The policy will have a long term legacy; while the Government confirmed that social housing rents will allow for increases of 1% a year plus CPI for five years from 2020, the earlier change will equate to a loss to Hackney of £142m over 10 years⁴.
- 2.49 Housing Associations have taken a similar hit, relative to their size. The Chief Executive of L&Q confirmed to a London Assembly Committee in October last year that the reduction had taken £75 million out of the organisation's income annually⁵.
- 2.50 The reductions were of course in place at the time of the fire at Grenfell.
- 2.51 This Commission has already received items on the response of the Council to the tragedy, which has involved significant investment in safety works.
- 2.52 The Government's £400 million cladding remediation fund was designed to resource the removal and replacement of any unsafe cladding. However, it did not cover works aside from this; for example investment in new fire doors.
- 2.53 The Commission heard in its April meeting that the Council's fire safety programme including an £11 million investment in 2018/19 had needed to be funded from existing sources, with no specific Government support.

⁴ Housing Asset Management Strategy 2019-2027

⁵ https://www.london.gov.uk/moderngov/documents/b17620/Minutes%20-

^{%20}Appendix%201%20-

^{%20}Transcript%20of%20Housing%20Associations%20Thursday%2004-Oct-2018%2014.00%20Housing%20Commi.pdf?T=9

- 2.54 There has also been public statements about the levels of direct investment in safety and compliance work by Housing Associations; most recently at a House of Commons Select Committee in October 2019⁶.
- 2.55 The National Housing Federation represents Housing Associations in England. Whilst welcoming the Government's proposals to improve safety in high rise buildings following the Hackitt Review, they also highlighted the costly nature of works and called for the new system to be fully funded. Without this, there could be an impact on the capacity of housing associations to implement the proposals and the risk of funds being directed away from the delivery of new homes. Housing Associations which have acted as 'early adopters' by trialling aspects of the new regulatory framework proposed in the Hackitt Review have seen impacts on operating margins⁷.
- 2.56 This review will explore the impact of these financial constraints on Housing Association operations in Hackney, and on the experiences of their tenants and leaseholders.
- 2.57 For its part, the Council has acknowledged the need to have secured additional savings in its Housing Revenue Account to mitigate the loss in rental income caused by the social rents reduction, and that this and the level of investment in fire safety work would impact on the ability for investment in other areas of housing management⁸.
- 2.58 This said, the Council was in a much stronger position around the overall quality of its stock than in some previous periods.
- 2.59 This was particularly in regards to the quality of homes internally; its 2018 stock condition survey found these to be generally in good condition, due to works and investment during the last 12 years on renewing kitchens, bathrooms, electrical wiring and heating systems. Moving forward there would be targeted focus on the relatively low numbers of homes not meeting these standards.
- 2.60 On external areas, the survey found 53% of blocks to be in good condition and a further 46% to be fair. 1% (21) of blocks were in poor condition, many of which already fell within planned improvement programmes. Improvements will be delivered through a seven year External Works Programme, with those in poorer condition prioritised in

⁶http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/housing-communities-and-local-government-committee/longterm-delivery-of-social-and-affordable-rented-housing/oral/106615.html

⁷ https://www.insidehousing.co.uk/insight/insight/hackitt-legislation-what-does-it-mean-for-housing-associations-61272

⁸ Through oral evidence from Cabinet Member, Housing Services and the Asset Management Strategy

- earlier years. It was confirmed to the Commission that external works would be the predominant focus of the upcoming improvements.
- 2.61 For Housing Associations, the Chief Executive mentioned above said that a response by the sector had been to "step back and reflect on how we could maintain our service in the face of these massive reductions in our income".
- 2.62 In L&Q's case, this had included changes to aid a more efficient and improved service (through bringing a maintenance service in house), but also having "to repair the existing kitchen when it was probably beyond its useful life" and "looking at the contract between the resident or the tenant and L&Q...to get closer to the contract".
- 2.63 During its review the Commission will seek to explore the response of Housing Associations to these reductions and cost pressures, in terms of any impact on their work and approaches in Hackney, and on the experiences of their residents.

Reduced public subsidy for affordable housing, and changing tenure

- 2.64 There have also been moves towards a wider range of development activity. This has seen Housing Associations developing more homes for open market and shared ownership sale and for affordable rent rather than social rent.
- 2.65 This has been in a context of cuts in Government grants, in the form of reduced subsidy for the delivery of new affordable homes. The 2010 Spending Review announced a 46% reduction in funding available for the development of new social housing.
- 2.66 The Affordable Housing Programme (the main public funding stream for housing regeneration) following this delivered a government grant per new home built of around £19,000; little more than a third than that provided in the previous funding period.
- 2.67 Alongside this, the Government introduced a new Affordable Rent model within the definition of social housing, allowing social housing providers to let new and vacant homes more flexibly; at up to 80% of market levels.
- 2.68 The Affordable Rent model was intended to help fill the funding gap in the fall in the subsidy received by Registered Providers, with a switch from a capital subsidy (housing grant) to a predominately revenue model (a greater reliance on rent).
- 2.69 Since 2010/11 Affordable Rent has taken over Social Rent as the most common tenure for new affordable housing supply in England⁹. There

⁹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_dat a/file/847661/Affordable_Housing_Supply_2018-19.pdf

- has also been increases in the share of total income which providers draw from market and shared ownership sales activity.
- 2.70 There have been well documented concerns about the affordability of the Affordable Rent model for low income households, particularly in high cost areas including Hackney.
- 2.71 The GLA manages the delivery of the Affordable Homes Programme in London, in negotiation with the Government. The previous London Mayor's alteration to the London Plan allowed for schemes with GLA funding to have up to 80% of market rents (with an average of 65% overall). Hackney was one of nine Councils which launched but lost a legal challenge to this and seeking the ability to determine its own affordable rent levels for development in its areas.
- 2.72 Under the current London Mayor's Affordable Homes Programme for 2016-21, the 90,000 new homes which it is expected to support start-up of will be made up of London Affordable Rent, London Living Rent and London Shared Ownership.
- 2.73 Rather than let at 65% or 80% of market rents, the homes under the London Affordable Rent element are generally expected to be let against benchmarks linked with social rents. Its introduction has been seen by some as enabling Housing Associations to return to applying for grant for the delivery of social rented homes. Whilst acknowledging that the picture was more nuanced than this, a Chief Executive of a g15 provider described the tenure as 'social rent plus a tenner'.
- 2.74 The majority of the homes delivered within the programme will be for London Shared Ownership, or London Living Rent.
- 2.75 London Shared Ownership homes allow a home buyer to purchase a share in a new home, and pay a regulated rent on the remaining, unsold share.
- 2.76 London Living Rent is ward-specific rent level (adjusted for bedroom size) based on a third of average local household incomes (and house prices in the Ward). It is designed to help households on average income levels save a deposit to buy their own home; with the opportunity to purchase the unit on a shared ownership basis.
- 2.77 This review will explore the types and extent of affordable housing being delivered by Housing Associations in Hackney, and the extent of its accessibility to families in housing need.

Diversifying and (until recently) greater surpluses, but threat to crosssubsidy model for affordable housing

2.78 Another response of Housing Associations to reductions in grant has been to access private finance to build more private homes for market

- sale, thereby generating surpluses which can be used for investment in new affordable housing.
- 2.79 This is often referred to as the 'cross-subsidy' model. The model has been one of the enablers of continued delivery of affordable housing, despite cuts in grant. The model also helped lead to significant increases in surpluses generated in the sector.
- 2.80 Concerns have been raised around social-purpose organisations building up such reserves rather than using greater shares of them to deliver more new homes and or to fully ensure decent and high quality stock¹⁰.
- 2.81 Developing Housing Associations can make the case that in a lower grant environment surpluses are needed to provide assurance to lenders and also to safeguard against unexpected events. The regulator itself sets success measures for Housing Associations around their ability to secure private finance with which to deliver new housing.
- 2.82 The Commission will seek to explore with Housing Associations approaches to any surpluses generated in the borough, and the extent of investment of these in the area, both in relation to new development and wider community offers. This will include seeking to explore how Housing Associations are balancing the need to achieve surpluses to enable access to finance and the management of risk, with that of investing in the borough.
- 2.83 This all said, the review is coming at a time when the cross-subsidy model for the delivery of new affordable housing, is under pressure. The model is predicated on a buoyant housing market, whereas London has seen more modest growth (with falls at the higher end). Perhaps more significantly, there have been significant falls in property transactions, making it more difficult to sell homes.
- 2.84 There has been commentary on the impact of this, in terms of significant reductions in the surpluses generated by the providers leading in this model, homes being left unsold, and an announcement by the Housing Association which delivered the greatest development in 2018, that it was putting a pause on further work. The cross-subsidy model has been labelled as broken by both the Mayor of London and (separately) by a leading provider to a Commons Select Committee, amongst calls for a return to greater levels of Government grant.
- 2.85 The Commission will seek to explore the impact of this on the delivery of affordable homes in the borough by our Housing Association partners.

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¹⁰ https://www.insidehousing.co.uk/news/betts-pushes-to-lead-parliamentary-inquiry-into-surpluses1-43937 / https://www.theguardian.com/housing-network/2018/feb/28/housing-associations-record-profits-affordable-homes

5. Timetable for review

- 5.1 Sections of a number of the Commission's meetings will be used to gain direct input from Housing Associations, and relevant services in the Council.
- 5.2 Alongside this, the Commission will hear about the views and experiences of Housing Association residents and their representatives. Details on this will be further developed.
- 5.3 In addition, the Commission will seek to conduct relevant site visits. It is likely that this will include exploring the approaches providers to meeting aspects around their wider social purposes.

Evidence gathering in formal meetings

Meeting 16 th December 2019 – items focused on repairs and maintenance		
Topic	Responsible Officer/Partner	
 How are Housing Associations in the borough working to keep homes safe, decent and in a good state of repair: How do Housing Association monitor and report performance on repairs and maintenance in Hackney, and what is the accountability to local residents and public bodies? How are Housing Associations ensuring they are responsive to Hackney residents' repairs needs? How is the right balance achieved between planned maintenance and reactive repairs, and value for money achieved? Meeting 19th February 2020 - items focused on 	_	
Associations are playing in best meeting housing need in Hackney		
Topic	Responsible Officer/Partner	
How are Housing Associations supporting the Council to best meet housing need and to fulfil homelessness duties: • What arrangements are in place between the Council and Housing Associations around the allocation of Housing Association units? • How are the arrangements working to best	A number of Housing Associations James Goddard, Housing Policy and Strategy Service Jennifer Wynter,	

enable the meeting of housing need and	Head of Benefits	
homelessness duties in Hackney?	and Housing Needs	
 What approaches are in place to enable tenancy take up and sustainment in Housing Association units? 		
What is the scale and nature of development by Housing Associations in Hackney, and what approaches are providers taking to their existing stock?	 A number of Housing Associations 	
 What approaches are Housing Associations taking to building new homes in the borough, what types of affordable homes are being delivered? 	 James Goddard, Housing Policy and Strategy Service 	
What approaches are Housing Associations taking to new tenancies		
 What is the scale of any disposal of affordable housing stock in the borough by Housing Associations, and how effective is the Council's 'Sales Protocol' in preventing the loss of affordable units? 		
Meeting 30 th April 2020 – items focusing on the wider social purposes of Housing Associations, and the strength and effectiveness of partnership		
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	ness of partnership Responsible	
Topic How are Housing Associations fulfilling their social purpose roles in Hackney	Responsible Officer/Partner A number of Housing	
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	recycling rates on estates
What are the strengths of the mechanisms for partnership working between the Council and Housing Associations, and can they be improved? O What are the current arrangements in Hackney and what are the benefits to the Council and Housing Associations?	A number of Housing Associations James Goddard, Housing Policy and Strategy Service
 What are the arrangements in some other boroughs, and what can Hackney learn from these? 	National Housing Federation

9. Executive Links & Response

9.1 The following corporate stakeholders have been consulted on this Terms of Reference:

Contributor	How have they been consulted on proposal
Council Lead Director	Ajman Ali, Group Director, Neighbourhoods and Housing
Council Lead Officers	James Goddard, Director, Regeneration Jennifer Wynter, Head of Housing Needs and Benefits
Executive Member(s)	Cllr Sem Moema, Mayoral adviser, Private renting and housing affordability

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