

Open Data Consultation  
Transparency Team  
Efficiency and Reform Group  
Cabinet Office  
1 Horse Guards Road  
London  
SW1A 2HQ

24 October 2011

*Dear Colleagues*

**Making Open Data Real – G15 submission**

This submission has been prepared on behalf of the g15 group of London's largest housing associations. The g15 are independent social businesses which work by ploughing their profits back into building new homes, improving their existing housing stock, and developing and delivering services to their residents and neighbourhoods. g15 provides over 400,000 properties that are the homes of 1 in 10 Londoners.

There has been understandable concern in the housing association sector over a number of years that the combination of invasive regulation and ill-conceived legislation may inadvertently result in the reclassification of housing associations as falling within the public sector.

This event, should it occur, would be very unwelcome news for the Government as our private sector loan book – soon to approach £70 billion - would become part of the Public Sector Borrowing Requirement (PSBR), and disastrous for the sector who would lose the confidence of the capital markets that supply the essential private finance required to produce new homes.

Unfortunately, we can only see your consultation paper, as currently drafted, adding to the valid concerns we have that we are incrementally heading down a path that will result in the Office for National Statistics (ONS) concluding that housing associations are indeed public bodies, rather than independent entities that mix mostly private money with much smaller amounts of public grant to produce amenities and services of benefit to the public.

We struggle to understand why this consultation paper should seek to further muddy the waters of what is or isn't a public body or service with the following definition:

The G15:

Affinity Sutton  
A2 Dominion Group  
Amicus Horizon  
Catalyst Housing Group  
Circle Housing Group

East Thames  
Family Mosaic  
Genesis Housing Group  
Hyde Group  
London & Quadrant

Metropolitan Housing Partnership  
Network Housing Group  
Notting Hill Housing Group  
Peabody Trust  
Southern Housing Group

**"Where we refer to public services, we mean public bodies and those funded, commissioned or entrusted by Parliament to provide a service".**

This misguided definition is also unhelpfully repeated in the Foreword by Francis Maude MP, Minister for Cabinet Office.

The definition is not only misleading, it is at odds with the definition of public service in the ONS Blue Book, and on the CLG website, and even the standard Cambridge dictionary definition. Further, it would surely lead to the unintended capture of a whole range of other private companies that provide services to the public through out-sourced service contracts.

Housing associations are the most successful public/private partnership model in Europe, let alone the UK. We combine the skills of the private sector with the ethos and objectives of public service, and have achieved blending private finance at very competitive rates with public subsidy for many years to produce a commendable contribution to the provision of affordable housing of all tenures for the community. Putting this at risk through sloppy draftmanship is inexcusable.

We would urge you to reconsider your definition of public bodies to make it very clear that this does not apply to the housing association sector.

Yours sincerely



**Keith Exford**  
**Chair of G15**

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