

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

25 October 2011

Dear Colleagues

Making Open Data Real

Affinity Sutton Group is one of the largest independent providers of affordable housing in England, with over 55,000 homes in more than 120 local authority areas throughout England.

We comprise two Registered Social Landlords – Affinity Sutton Homes and specialist BME association Aashyana - a property management company called Grange and a specialist buildings maintenance provider, Community Building Services.

We were concerned to read your consultation proposals which appear to extend the definition of what is a public body or service.

The consultation paper contains the following definition –

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

This is a non trivial issue for social housing providers who have over many years successfully combined the skills of the private sector with the ethos and objectives of public service to great effect. In our own case we are a charitable housing group with a legacy that dates back to 1900, many of our homes were built without recourse to public funds relying instead on the charitable donation of our founding benefactor. The properties we own have a historic cost of £2.219bn against which we have raised £1.32bn of debt funding and we have received £831m of grant from the state. The grant we have received enabled the group to build more new homes to be let at rents which are affordable to low income households. We have raised money in the traditional banking sector and the capital markets blending private finance at very competitive rates with public subsidy for many years. As a result of our private sector status we have been able to stretch the public funds without increasing the overall public debt, something that successive governments have come to value.

However we are concerned that initiatives such as the one outlined in the consultation paper 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 the sector's private loan book – soon to approach £70 billion - would become part of the Public Sector Borrowing Requirement (PSBR). This would have a catastrophic effect on the continued supply of new homes which this government is so keen to deliver.

The definition is not only of concern to housing associations most of whom are charitable industrial and provident societies but it must also be of concern to many charities and private companies that provide services to the public through out-sourced service contracts from central and local government.

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

Clare Miller
Director of Governance and Compliance

