



Council housing: a real future
Summary of responses to the consultation



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November 2010
Department for Communities and Local Government

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November 2010

ISBN: 978-1-4098-2665-1

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1. Introduction

This is a summary of responses received by the Department for Communities and Local Government to a consultation held between March and July 2010 on proposals for the reform of the current system of council housing finance.

The summary sets out the main messages emerging from the responses to the consultation. It is a neutral record and makes no attempt to provide the current Government's views on the responses or their policy position. Full details of the Government's policy on reforming council housing finance will be published in early 2011.

2. Background

On 25 March 2010 the then Government published *Council housing: A real future (Prospectus)*, marking the start of a period of consultation on proposals to replace the current centralised system of financing council housing services. The proposed new system would involve local authorities becoming self-financing, taking on responsibility and accountability for their housing services and no longer being subject to the annual redistribution of rental income. The Prospectus can be seen at:

<http://www.communities.gov.uk/publications/housing/selffinancingprospectus>

The questions asked in the Prospectus are listed in Annex A.

3. The structure of the summary

The Prospectus included a series of questions. Given the nature of the material provided by respondents, this summary has been structured to reflect the main themes raised by respondents rather than the sequence of questions that prompted them.

Section 4 provides an overview of the responses. It begins with a description of the number of participants by sector, followed by a quantitative assessment of the extent to which local authority responses indicated acceptance of the proposals.

Section 5 provides a brief summary that reflects the balance of opinions on the proposed methodology.

Section 6 summarises views on the treatment of debt and the financial transactions which form the core of the proposals.

Section 7 picks up other topics that were identified by respondents as important.

4. The response: an overview

Stakeholder participation in the consultation

In total 205 responses were received. These came from local authorities, arms length management organisations (ALMOs), bodies representing authorities or ALMOs, tenant organisations, professional bodies, consultancy and other private companies, lobby groups, individuals and a charity. Figure 1 shows the number of responses by category of respondent.

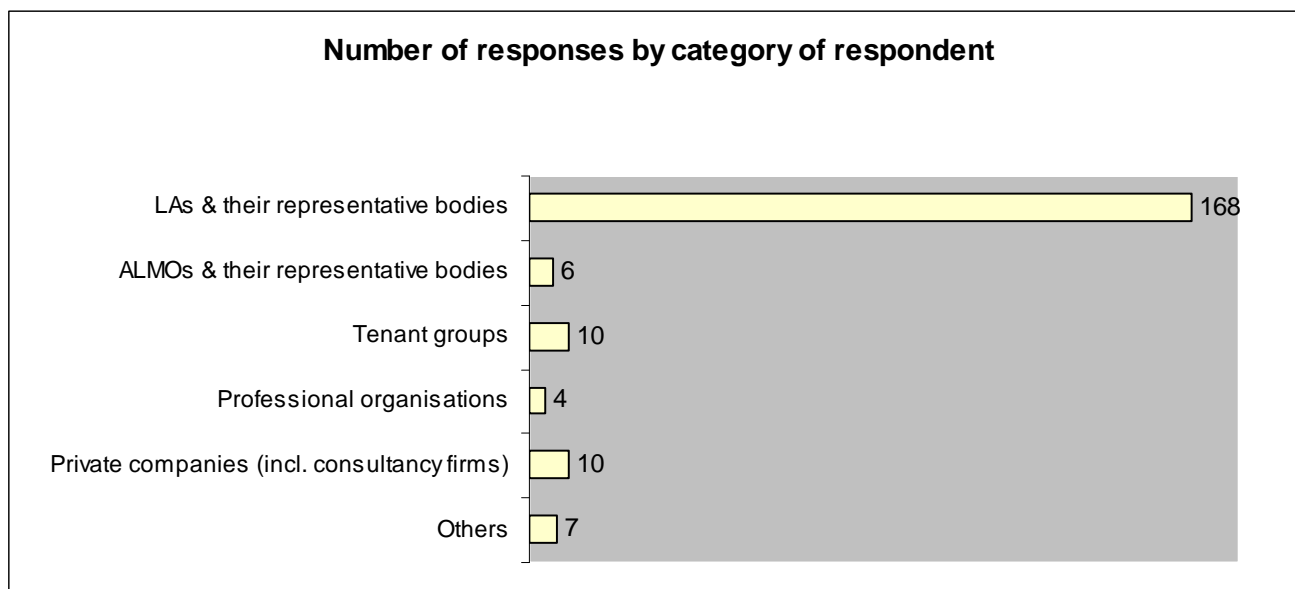


Figure 1

Many local authorities responded jointly with ALMOs or represented their views. The ALMO responses shown in Figure 1 are those that were submitted separately.

Of the 168 responses from local authorities or their representative bodies, 164 were from individual authorities. This represents 93 per cent of the 177 authorities operating a Housing Revenue Account at that time.

A further 41 responses were received from organisations other than local authorities and individuals. A list of respondents is provided at Annex B.

The extent to which the proposals were supported

The degree of overall support for the proposals in the Prospectus has been assessed. This is based on willingness to accept an offer of self-financing on the terms set out in the Prospectus. Four categories of support have been identified:

1. The strongest level of support includes those who said they would accept an offer on the terms proposed, subject to confirmation of final figures.
2. Those who identified specific technical or local issues which would need to be resolved before they could accept.
3. Those who supported the principles but identified local or technical matters and a significant funding issue which needed to be resolved before they could accept.
4. Those who fundamentally rejected the proposals.

Figure 2 shows the percentage of responding authorities falling within each level of acceptance.

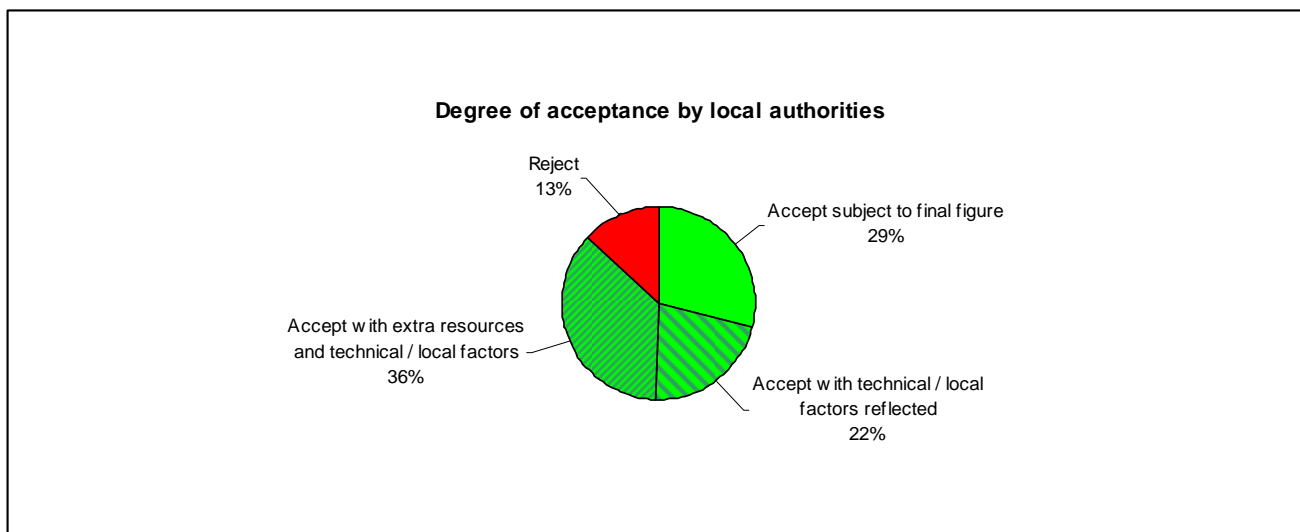


Figure 2

Table 1 shows the number and percentage of responding authorities falling within each level of acceptance.

Degree of acceptance	Number of LAs	% of LAs	
Accept subject to confirmation of final figure	47	29%	87%
Accept if technical / local factors are resolved	36	22%	
Accept if funding issues and technical / local factors are resolved	60	36%	
Reject	21	13%	
Total	164	100	

Table 1

The Prospectus also asked respondents whether they supported the principle of self-financing, regardless of whether they supported the proposals in the form they have been made. Of the 164 local authorities that responded, 162 (99%) supported self-financing in principle. None was opposed, but two (1%) did not give a clear indication.

Figure 3 shows the extent of support for self-financing in principle among respondents other than local authorities.

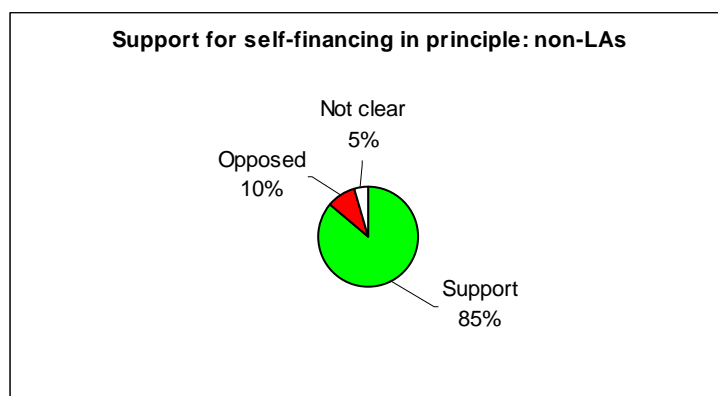


Figure 3

Of the 41 non-LA respondents, 35 (85%) expressed support in principle, four (10%) were opposed and two (5%) did not give a clear indication. The four non-LA respondents opposed to self-financing in principle were two local tenant organisations, one lobby group and one private consultancy company.

5. Views on the proposed methodology

There was widespread agreement with the general methodology proposed in the Prospectus. Many of the reservations related to assumptions about costs and the affordability of allocated debt.

Concern over the level of debt featured prominently in responses to an earlier consultation in 2009 and this remained one of the main issues. However, there had been a clear shift in views since the earlier consultation. There was broader acceptance that a level of housing debt redistribution was an acceptable or necessary price to pay for the freedoms and benefits that the reforms would bring. This view was shared by many of the respondents who faced the prospect of new or increased debt themselves.

There was, however, continuing concern about the level of debt that would be allocated. In a few cases, respondents felt that they had enough information to rule out acceptance of an offer of voluntary reform on the basis that the level of debt would place their business in a non-viable position. At the other end of the scale, a larger number were prepared to offer support for the proposals on the basis of the information provided in the Prospectus, albeit subject to caveats about the precise terms of the final offer.

Most respondents indicated that support was dependent on the provision of more information or assurances on specific issues. A common area of concern was the discount rate which would be applied to the cash flows in order to value the business, with many arguing that a rate lower than 6.5 per cent would make their business plans unsustainable. Another common concern was uncertainty over future rent policy. Respondents said their plans depended on certainty of being able to raise the rental income assumed in the valuation.

Respondents also noted that plans were very sensitive to changes in interest rates and some respondents questioned the reliability of assumptions about these and expressed concern about the resulting exposure to risk.

Some respondents also expressed concern that the local allocation of the national uplift in allowances proposed in the Prospectus did not reflect true local need to spend. Many were concerned over the uncertainty of funding for things that were not met within the settlement, including the Decent Homes backlog, disability adaptations and new supply.

6. Views on the levels of allocated and ongoing debt

Setting a level of opening debt

As noted above, the large majority of respondents accepted that a move to self-financing could not be achieved without the reallocation of an appropriate level of housing debt. Some believed that the indicative level of debt provided with the Prospectus was too high for them, though only a small number believed that this was an insuperable barrier to self-financing.

Some were opposed in principle to any increase in their debt under self-financing. Some respondents linked this to difficulties in convincing local members and tenants of its fairness, anticipating problems in justifying what might be perceived as terms that were less favourable for them than for neighbouring or other local authorities.

Objections to the level of debt were more prevalent among those who would be taking on a significant amount of new debt, particularly those who said they had made considerable efforts over a period of time to reduce or clear their existing debt.

However, most respondents were prepared in the circumstances, and particularly in the light of the increase in allowances in the proposed settlement, to take on a level of debt, provided that it was affordable within their local business plan.

A number of respondents expressed the view that, while in principle the need for a re-allocation of debt was recognised, the national total of allocated debt should not exceed the total level of housing debt held by local authorities prior to the transaction.

Restricting the future level of debt

There was widespread concern over the proposal to cap debt at the opening level under self-financing. It was commonly felt that this would reduce and in some cases remove the headroom needed within business plans to manage risks and would undermine the flexibility and opportunity that was seen as a major attraction of self-financing.

Many respondents did not understand why the Prudential Code, and the track record of responsible borrowing by local government, was not seen as a sufficient safeguard against imprudent borrowing under self-financing. A number of respondents argued that housing debt should not be part of the key metric used to assess the affordability of public borrowing levels.

Concerns about the scale of the debt reallocation

There were some concerns arising from the scale of the multiple simultaneous adjustments to housing debt that would be needed at the outset of self-financing. These included the capacity of the Public Works Loan Board (PWLB) to handle the transactions. Many expressed concern that the scale of the transactions could affect PWLB interest rates and that this could have detrimental effects on both the Housing Revenue Account and the General Fund.

A number of respondents sought more information about the mechanics of the debt transaction process, whether and how Government would calculate and meet the cost of premiums on the early repayment of debt and whether this would extend to premiums on open market debt. Many saw advantages in allowing local authorities to determine their own debt commutation solution. Others saw benefits in local authorities being given flexibility to take on debt in stages between the date of agreement and the start of self-financing.

Further comments on debt

Other views expressed in a number of responses include:

- Opening debt levels should incorporate funding for things not covered in the proposed settlement, such as all outstanding Decent Homes work.
- The level of debt penalises those who have made sacrifices to pay down debt or have borrowed in order to achieve the Decent Homes standard.
- Opening debt levels should reflect recent prudential borrowing taken on to finance new affordable housing.
- The opening level of debt should be adjusted in cases where actual housing debt exceeds assumed debt.
- The proposed cap on borrowing would limit opportunities for new build and estate regeneration. It would also prevent some local authorities from maintaining stock to minimum standards.
- Consideration should be given to reassessing the need for a borrowing cap after some years of self-financing.
- More information was needed on how the borrowing cap would operate, for example whether it would be linked to inflation.
- A system of borrowing ratios and covenants would be more appropriate than a cap on borrowing.

7. Views on individual topics

The financial, regulatory and accounting framework of self-financing

Most respondents supported the regulatory and accounting framework set out in the proposals. There was support for increased transparency, but many pointed to the need for further work to resolve outstanding issues such as the unpooling of housing debt. Many respondents asked for more details on the arrangements and practical guidance. However, some wanted to avoid further regulation and an over-prescriptive approach.

Feelings were mixed about separating housing debt from other local authority debt and about keeping a separate housing balance sheet. Concerns included additional costs, a detrimental

effect on risk management, and the need for new treasury management functions. Respondents said it would be necessary to work closely with CIPFA in developing these proposals.

Several respondents said that individual councils should make their own decisions about the balance between debt repayment and investment.

More detailed matters that were raised included:

- The use of interest rate swaps to manage risk.
- New costs for the General Fund where current debt is assumed to be nil and the Minimum Reserve Provision is increased.
- The treatment of impairments and the potential effect this could have on the accounts.
- Issues in trying to separate out assets and liabilities in order to prepare a housing balance sheet.
- The apportionment of debt management costs to the HRA and General Fund.
- The effect on the General Fund of the 'Item 8' determination.
- Calls for guidance on how to treat depreciation under self-financing.

The HRA ring fence and the general fund

There was strong support for retaining and clarifying the operation of the HRA ring fence. The underlying issue for most respondents was the need to protect housing interests. However, many also placed emphasis on the importance of protecting the General Fund from costs which should be met by the HRA. Many respondents also wished to retain local discretion and called for flexibility to allow local circumstances to be taken into account in decisions about allocating costs. Proposals to issue revised guidance were widely welcomed.

A small number of respondents were opposed to the ring fence around the HRA, arguing that it represented an unnecessary constraint, or imposed unnecessary bureaucracy and extra cost. Problems were cited arising from increasingly mixed tenure estates where it is hard to distinguish between services which benefit only council tenants and those which benefit a wider group of residents.

Rents

There was widespread interest in rent policy. Issues were raised about the balance between central and local control, uncertainty about future policy and detailed technical points. Most respondents saw resolution of rent policy as central to the success of the reforms, with viability of the business relying heavily on the reliability of projections of rental income.

Many respondents called for long-term assurances from central government about rent policy in order to create a stable basis for assumptions about rental income. There were also concerns about the effects that any changes to Housing Benefit would have on rental income. Concern was also expressed about the long-term affordability for tenants of rent increases.

Many called for greater control over rent setting, with some seeking complete independence from Government control. Far more wanted greater flexibility to set rents within a national policy framework possibly involving tenants in local decision making.

A number of respondents reported that they could not achieve convergence with housing association rents by 2015-16 as a result of the Government's 'caps and limits' policy and called for compensation for the resulting loss of income.

Other views expressed on rent policy included:

- A concern that Housing Benefit 'limit rents' and Rent Rebate Subsidy Limitation prevented a level playing field between local authorities and housing associations.
- Support for the inclusion of a voids allowance in the valuation and a need for realistic assumptions about collection rates.
- That the figures in the exemplification do not properly reflect costs of rent capping.
- Concern about how service charges will be dealt with in the policy and valuation.

Assumptions made about costs in the valuation

Respondents welcomed the proposal to uplift allowances in the valuation, though many expressed concern that they fell short of the costs identified in the published research or local surveys.

Some respondents questioned the methodology for translating the national figures into local adjustments, arguing that this required stock condition surveys or, at a minimum, the application of knowledge about specific local circumstances.

Specific areas of concern included:

- Higher costs arising from non-conventional building methods, for example in new towns.
- Uplifts would still leave councils less well resourced than housing associations.
- Assumptions favour inner cities whereas areas with dispersed stock have high costs.
- Assumptions about the labour pool do not reflect true catchment areas.
- Model does not allow for real increases in costs over the 30-year business plan.
- Costs for high rise flats are higher than those in the assumptions.
- Councils getting transitional protections under the current subsidy system will lose these under self-financing.
- Calls to include the uplifts in the next HRA subsidy determination rather than wait for self-financing.

New build

There was considerable interest in building new council housing, which was seen as a strong potential advantage of self-financing. This was modified by uncertainty about the availability of social housing grant and by the impact of the proposed cap on borrowing. Many saw the discount rate used in the valuation as important in creating the capacity to borrow to fund new supply.

Other factors identified that could prevent the building of new homes, or reduce the numbers, included difficulty finding available land. Many respondents cited competition for resources between the demand for new housing and the need to maintain existing stock to an acceptable standard. Despite virtually universal recognition of the need for new homes and an intention by many to build at least some, many respondents saw maintenance as a higher priority.

In terms of the number of homes local authority respondents felt they would be able to build, these typically ranged from single figures per year to up to 30, with a minority up to the hundreds. In other cases, figures were suggested without specifying the period over which they could be built. It was frequently stated that there would be more scope for new building after the early years of the business plan had passed.

Other suggestions included buying back former local authority homes, de-converting flats, extending homes and, if permitted, building homes for market sale.

Capital receipts

The proposal to allow local authorities to retain all capital receipts was widely welcomed. Some expressed concern that this could lead to reductions in levels of grant. It was suggested that the proposals should apply to all HRA asset disposals. A few respondents called for there to be no restrictions on the use of proceeds and some suggested changes to the proposed administrative procedures.

Some respondents called for the proposals to be implemented immediately rather than linked to self-financing.

Specific problems were raised in relation to former new towns, where there are separate provisions for clawback payments on the sale of assets.

Re-opening the settlement at a later date

Many respondents were opposed to any provisions that would allow government to revisit the settlement at a future date. This was largely linked to fears that it could be used to penalise councils who drive up efficiency under self-financing. There was also concern that this would undermine the principles of self-financing and the ability to plan long-term.

However, many also saw a limited re-opening provision as a useful safety measure that could be applied to the council's benefit to compensate for any additional costs resulting from future changes in government policy. These might include, for example, changes in rent policy or additional costs resulting from changes to the Decent Homes standard. Most of those who supported a re-opening provision said that it should be very carefully defined, leaving no margin for doubt about the circumstances under which it could be used.

Decent Homes, the backlog and other grant funded needs

There was widespread concern that the outstanding Decent Homes work would not be funded from within the self-financing settlement. Many respondents expressed concern about relying on capital grant outside the self-financing settlement. A number called for all Decent Homes costs to be included within the self-financing settlement. Some respondents considered the Decent Homes standard to be too low and called for funding to achieve a higher standard.

A number of respondents raised concerns about the Decent Homes funding for ALMOs and sought clarity about how and when this would be delivered. It was suggested that Decent Homes funding should not be conditional on ALMO status or performance rating.

There was a widespread call for funding for disability adaptations. Many believed these should be funded in the self-financing settlement rather than through grant funding. There

were also many calls for funding to meet other statutory obligations including energy efficiency, health and safety and asbestos removal, as well as funding for estate regeneration.

Other aspects of the settlement calculation

It was noted that the HRA subsidy system meets some early repayment premiums on debts, as well as the costs of some leases, and that these should be funded in the settlement.

Many councils said that they were planning the demolition or disposal of stock as part of regeneration schemes and called for the loss of rental income from those homes to be taken in to account in the valuation of the business.

Some said that there would need to be an adjustment to deal with a discrepancy between the debt positions at the opening and mid-year points.

PFI issues

A number of respondents commented on the need for clarity about the treatment of housing PFI schemes. There was concern by those receiving housing PFI subsidy that the proposed methodology did not cover the cost of losing the subsidy. Most of those who expressed a preference favoured separating PFI schemes from the settlement and continuing to pay PFI subsidy. The alternative proposal was to use a different discount rate for the PFI costs in the self-financing valuation.

Stock transfers

Many respondents wished to retain the option of transferring stock to a housing association, although many believed that the new policy on transfer made this harder. Some noted that the differing treatment of VAT for local authorities and housing associations made it more difficult to compare costs. A number supported the continuation of a transfer option under the previous conditions.

Treasury management

A number of councils anticipate an increase in demand for treasury management resources and other skills under self-financing. There were calls for these costs to be funded.

Leaseholders

A number of respondents had encountered difficulties with implementing service charges for leaseholders. There were mixed feelings about the use of sinking funds to spread the cost over time. Some councils were already operating them with success but others thought they would not be practical or would create a burden on the local authority. The general consensus was that there should be local discretion in setting up sinking funds but that guidance would be helpful.

Alternatives to the proposed reforms

Suggestions for alternative systems include the development of models of new companies that could operate within separate borrowing rules.

Others called for a system under which rental income is retained locally, existing stock is fully maintained by increased levels of central funding and further funding provides for a large scale programme to build new council housing.

These suggestions tended to come from organisations other than local authorities. Those authorities that opposed the proposals did so almost exclusively on the basis of the specific terms of the proposal rather than out of a lack of support for the principle of self-financing.

Annex A

The consultation questions

1. What are your views on the proposed methodology for assessing income and spending needs under self-financing and for valuing each council's business?
2. What are your views on the proposals for the financial, regulatory and accounting framework for self-financing?
3. How much new supply could this settlement enable you to deliver, if combined with social housing grant?
4. Do you favour a self-financing system for council housing or the continuation of a nationally redistributive subsidy system?
5. Would you wish to proceed to early voluntary implementation of self-financing on the basis of the methodology and principles proposed in this document? Would you be ready to implement self-financing in 2011-12? If not, how much time do you think is required to prepare for implementation?
6. If you favour self-financing but do not wish to proceed on the basis of the proposals in this document, what are the reasons?

Annex B

Local authority respondents

Adur District Council
Arun District Council
Ashfield District Council
Ashford Borough Council
Babergh District Council
Barking and Dagenham, London Borough of
Barnet Council and Barnet Homes
Barnsley Metropolitan Borough Council
Barrow Borough Council
Basildon District Council
Bassetlaw District Council
Birmingham City Council
Blackpool Council and Blackpool Coastal Housing
Bolsover District Council
Bolton Metropolitan Borough Council
Bournemouth Borough Council
Brent, London Borough of
Brighton and Hove City Council
Bristol City Council
Broxtowe Borough Council
Bury Metropolitan Borough Council
Cambridge City Council
Camden, London Borough of
Canterbury City Council
Castle Point Borough Council
Central Bedfordshire Council
Charnwood Borough Council
Cheltenham Borough Council and Cheltenham Borough Homes
Cheshire West and Chester Council
Chesterfield Borough Council
City of York Council
Colchester Borough Council
Corby Borough Council
Cornwall Council
Crawley Borough Council
Croydon, London Borough of
Dacorum Borough Council
Darlington Borough Council
Derby City Council
Doncaster Metropolitan Borough Council
Dover District Council
Dudley Metropolitan Borough Council
Durham County Council
Ealing, London Borough of
East Devon District Council
East Riding of Yorkshire Council
Eastbourne Borough Council
Enfield, London Borough of

Epping Forest District Council
Exeter City Council
Fareham Borough Council
Gateshead Council
Gloucester City Council
Gosport Borough Council
Gravesham Borough Council
Great Yarmouth Borough Council
Greenwich, London Borough of
Guildford Borough Council
Hackney, London Borough of
Hammersmith and Fulham, London Borough of
Haringey, London Borough of
Harlow District Council
Harrogate Borough Council
Harrow, London Borough of
Havering, London Borough of
High Peak Borough Council
Hillingdon, London Borough of
Hinckley and Bosworth Borough Council
Hounslow, London Borough of
Hull City Council
Isles of Scilly, Council of the
Islington, London Borough of
Kensington and Chelsea, Royal Borough of
Kettering Borough Council
Kingston upon Thames, Royal Borough of
Kirklees Council and Kirklees Neighbourhood Housing
Lambeth, London Borough of
Lancaster City Council
Leeds City Council
Leicester City Council
Lewes District Council
Lewisham, London Borough of
Lincoln City Council
Luton Borough Council
Manchester City Council
Medway Council
Melton Borough Council
Mid Suffolk District Council
Milton Keynes Council
New Forest District Council
Newark and Sherwood District Council
Newcastle City Council
Newham, London Borough of
North East Derbyshire District Council and Rykneld Homes
North Kesteven District Council
North Tyneside Council
North Warwickshire Borough Council
North West Leicestershire District Council
Northampton Borough Council
Northumberland County Council

Norwich City Council
Nuneaton and Bedworth Borough Council
Oadby and Wigston Borough Council
Oldham Metropolitan Borough Council
Oxford City Council
Poole Borough Council and Poole Housing Partnership
Portsmouth City Council
Reading Borough Council
Redbridge, London Borough of
Redditch Borough Council
Richmondshire District Council
Rochdale Metropolitan Borough Council
Rotherham Council
Rugby Borough Council and Rugby and District Tenants' Association
Runnymede Borough Council
Salford City Council
Sandwell Metropolitan Borough Council
Sedgemoor District Council
Selby District Council
Sheffield City Council
Shepway District Council
Shropshire Council
Slough Borough Council
Solihull Metropolitan Borough Council and Solihull Community Housing
South Cambridgeshire District Council
South Derbyshire District Council
South Holland District Council
South Kesteven District Council
South Lakeland District Council
South Tyneside Council
Southampton City Council
Southend on Sea Borough Council and South Essex Homes
Southwark, London Borough of
St Albans City and District Council
Stevenage Borough Council
Stockport Metropolitan Borough Council
Stoke on Trent City Council
Stroud District Council
Sutton, London Borough of and Sutton Housing Partnership
Swindon Borough Council
Tamworth Borough Council
Tandridge District Council
Taunton Deane Borough Council
Tendring District Council
Thanet District Council
Thurrock Council
Tower Hamlets, London Borough of
Uttlesford District Council
Waltham Forest, London Borough of
Wandsworth, London Borough of
Warrington Borough Council
Warwick District Council

Waveney District Council
Waverley Borough Council
Wealden District Council
Welwyn Hatfield Borough Council
West Lancashire Borough Council
Westminster City Council
Wigan Council
Winchester City Council
Woking Borough Council
Wokingham Borough Council
Wolverhampton City Council
Wycombe District Council

Other respondents

A1 Housing Bassetlaw
Adrian Waite (Independent Consultancy Services)
Agencies & Trainers for Involved Communities
Arlingclose
Ashford Borough Tenants' Forum
Association for Public Service Excellence
Association of Retained Council Housing
Brian Austen, Stephen Garlick & J.M. Austen
Butlers
Camden Federation of Tenants & Residents Associations
Chartered Institute of Housing
Chartered Institute of Public Finance Accountancy
Cllr Tony Coates, Winchester City Council
Cllr Tony Orgee, South Cambridgeshire District Council
Councils with ALMOs Group
Defend Council Housing
Gateshead Housing Company
House of Commons Council Housing Group
Housing Quality Network
JC Consultants (Farnham)
Joan Goodwin, Birmingham City Council
Kerry Polard & Philip Shama
Keynote Services Ltd
Kirklees Federation of Tenants' & Residents Associations
Lambeth Alliance of Tenant Management Organisations
Local Government Group
London Councils
National Federation of ALMOs
Savills
Sector
Shelter
SIGOMA
Society of London Treasurers
Sutton Federation of Tenant & Resident Associations
Tenant Participation Advisory Service
Tribal

Weybourne & Heath End Tenants' Association
Wigan & Leigh Housing Company
Wigan & Leigh Housing Company Tenant Board Members
Wolverhampton Federation of Tenants Associations
Your Homes Newcastle