



Heat Network (Metering and Billing) Regulations 2014: proposed amendments

Supported Housing in Partnership response

SHiP is the membership organisation for Registered Housing Associations who provide supported housing. We were founded over 30 years ago and represent over 40 Registered Providers across England including G15 associations e.g. Clarion to smaller specialist organisations e.g. YMCA England.

As supported housing specialists we have restricted our response to those areas pertinent to supported housing. If you have any queries or further issues in relation to supported housing that you would like to discuss please do not hesitate to contact us-as the voice of supported housing in the sector and with particular expertise in housing management issues we would be happy to extend this dialogue. Our contact details are therefore at the bottom of this response.

SHiP consulted with members on the following areas that in the main relate to Question Three of the consultation

Q3. Would you suggest other categories of buildings which should be included in the 'Viable' or 'Exempt' classes? Are there other technical reasons we should consider for the 'Exempt' class? Please supply evidence to support your answer.

SHiP response: SHiP members responded that '**supported housing**' should be an exempt class of accommodation. Member relied on the following evidence:

Background

At any one time over 140,000 people live in RPs supported housing provision (NHF 2019). For the majority of these people supported housing provides an important bridge to more independent living enabling them to acquire the skills to manage their move on accommodation. For others this type of housing provides them with the support they need on an ongoing basis to retain their current home.

Supported housing provides specialist housing and support, designed to meet the needs of specific customers and often for a time limited period. The very essence of supported housing is that it provides the housing and the associated support to enable customer to acquire or maintain their living skills.

Rationale

- Physical environment: there are significant implications in terms of both cost and viability in introducing separate metering into what are often complex buildings; this is particularly the case when considering conversions of larger properties to studio flats where the cost would be disproportionate to the benefit and because some buildings simply will not lend themselves to this level of adaptation of services within reasonable cost parameters.
- There are a significant number of supported housing schemes providing self-contained accommodation which operate short term and emergency lettings. Because of fast occupancy turnover the only practical way of ensuring that residents pay costs based on actual usage in these schemes would be through use of pre- payment meters. These would add to the costs of installation and administration and would not be appropriate in these schemes for other reason where, for example new residents moving in on an emergency basis may not have the means to pay for fuel when they take up occupancy. Supported housing providers need to ensure that residents have access to heat and hot water without requiring upfront payment in these circumstances.
- Arrangements that require billing to be carried out by a third party will add to the administration charges. These administration charges will be passed on to the customer, the vast majority of whom in supported housing are on low incomes.
- Residents of supported housing, in particular in 'first stage' services are often in need of high levels of support - adding a set of bills to pay when someone has a chaotic lifestyle or is already struggling with debt adds a layer of complexity that is not helpful to the client
- For example, where clients are struggling with financial issues and/or perhaps substance use, the additional burden of an extra bill to pay presents a risk that this bill then goes unpaid, thus adding to debt issues and resulting potentially in services being cut off. This also means they will acquire a 'poor credit' rating with utility companies restricting their options when moving on to more independent accommodation.
- A further and critical issue in terms of our responsibilities to our residents is fuel poverty- by giving people another bill to pay, there is a risk clients will simply not heat their homes and will fall victims to fuel poverty- exactly the type of situation from which all supported housing providers are trying to support them.
- The cost of moving to individual meterage and billing particularly in some of the complex services which are a mix of studio flats and shared housing would have to be absorbed into the charges made.

Supported Housing Accommodation charges are already the subject of scrutiny by Government. We believe there is a lack of cost benefit of applying the regulations to supported housing plus will disadvantage those who are most vulnerable in our society. Supported housing provides a valuable opportunity for people to acquire or maintain independent living

skills in an environment that enables them to remain safe and healthy in their living environment.

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If you want to speak to SHiP about this consultation response please contact:

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