

## BUSINESS STRATEGY

2018 - 2023

We are a specialist housing association committed to preventing homelessness and supporting vulnerable people's health, wellbeing and independence.



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## 1. Executive summary

The next five years will see unprecedented change. We will approach it in exactly the same way as has proved successful in the past – by thinking for ourselves, being pragmatic, making best use of available resources, serving Sussex communities, supporting our vulnerable clients and helping challenge poverty, homelessness and social exclusion.

This strategy explains how we will continue to fulfil our mission as policy, the economy, population demands, the housing market, welfare benefits, commissioning and funding and clients' needs and expectations all change. We anticipate that all these factors will affect Southdown.

We know that we are not alone and that the whole of our sector faces great uncertainty. We can achieve more in working together than we can alone, and have always used partnerships and collaboration to help us provide more homes and services for our clients. In order to deal with the changes and challenges ahead, Southdown will find partners from the public and voluntary and community sectors to work with us to create new approaches and make the biggest impact.

Our job is to ensure that while change will and must happen, we stay focused on our mission and values.

#### What we'll do

We've got big plans and ambitions for the next few years. By adopting the correct strategies and staying true to our values we are confident that we can continue to perform strongly and make a big impact in supporting those most in need of the services we provide.

Here's what's at the top of our priority list to have achieved by 2023.

- Develop more homes at social rent for vulnerable people with continuing support needs
- Secure and protect sufficient social care funding to maintain viability of support services
- Deliver more services to support our tenants' and clients' lives
- Diversify and remodel services to meet changing commissioning needs and priorities
- Put even more focus on developing community health and wellbeing services
- Invest in our staff to grow and develop their skills
- Find more ways to ensure value for money
- Continue to challenge poverty
- Be ready for opportunities

Manchers

Neil Blanchard Chief Executive March 2018



Southdown | About us Business Strategy 2018-2023

## 2. About us

Southdown was established as a not-for-profit organisation in 1972 to meet the needs of vulnerable people who were struggling to access and maintain housing and to support them to overcome the challenges they faced.

Over the past 45 years we have continued to put this original mission into practice, but by expanding our business activities we have been able to maximise the number of people across Sussex who are able to benefit from the services we provide.

#### Activities now include:

- · Supported Living and Registered Care for people with learning and physical disabilities
- Floating Support and Homelessness Crisis Prevention services
- Accommodation based Supported Housing
- Mental Health Recovery services
- Supported Employment services
- Health and Wellbeing services, including primary care based Social Prescribing
- · Peer Specialist services facilitating clients to support one another
- · Housing Brokerage for offenders
- · Community Outreach Support for people with learning and physical disabilities
- Specialist advice, support, training and consultancy

Each service has its own aims and objectives but they all adopt the same personalised approach to support, with staff working alongside clients and tenants to empower them to develop skills and confidence to increase their independence.

With our support we aim that clients and their families will achieve and sustain personal goals, aspirations, and health and wellbeing outcomes. Although landlord and housing management activities form a minority part of Southdown's overall business operations and income (18% in 2018/19), as a Housing Association registered with the Regulator of Social Housing, protection and growth of our housing assets is a key focus.

Central to how we work as an organisation are the values and the pledges we have made to our clients and staff. In these we hold a commitment to provide high quality services that make a real difference to people's lives, appreciating that we can only achieve this if we are the best employer possible to our staff, and operate in an efficient, fair and caring manner.

#### Our strategic priorities

- 1. Clients and supporting them to overcome challenges
- 2. Tenants and their homes
- 3. Staff and being the best employer we can be
- 4. Providing more genuinely affordable homes
- 5. Flexibility to meet changing needs and realise new opportunities
- 6. Financial strength and robustness

people supported across Sussex 2018-19





£25.9 million (E) (E)





## 3. Our guiding principles

## Vision

Everyone, no matter what their life experience, background or challenges will have the opportunity to lead their life to the full.

## Mission

To offer vulnerable people the support they need to live a fuller life.

## Values

#### Responsive to need

- · We respond to the changing needs of clients, local communities and commissioners
- · We track and support the development of best practice and innovation
- · We are optimistic and solution focused and respond calmly and positively to resolve issues as they arise

#### Ethical in all we do

- We maintain a set of core values and embed these into everything that we do
- We appreciate the privileged role we have in supporting vulnerable people and always place their interests at the core of all decisions we make
- · We aim to be an employer of choice and offer good benefits and working conditions to our staff

#### **Dedicated to quality**

- We provide high quality personalised services
- · We invest in staff and managers to ensure that they are skilled, confident and caring
- · We put in place robust mechanisms to monitor the quality and impact of the services we provide
- · We perform at a consistently high level to deliver contract outputs and outcomes

#### **Value for Money**

- · We offer services that offer good value for money for the quality delivered
- We continually review and benchmark all operational and central services cost areas and set savings targets
- We operate sound and robust business systems and processes to maximise efficiency

#### Focused and stable

- · We work in geographical areas that can be accessed and supported by our core resources
- We focus on client groups and service models where we are confident that we can deliver the required skills, resources and quality
- We are a not for profit organisation and use any surpluses generated to reinvest in our services, develop innovation and enhance our stability and financial security

Southdown | Our operating environment

## 4. Our operating environment

During the last year we have shared with our Board and staff our assessment of the current and emerging issues that will impact on our business and the strategies we have developed in response. These include:

#### 4.1 Government strategies

The vast majority of Southdown's income is publicly funded through welfare benefit payments for rental charges and commissioned contracts to deliver care and support services. This high level of reliance means that we are extremely susceptible to policy and resource allocation changes for both national and local government. Since the economic crisis of 2008 and the resultant era of austerity, we have faced considerable and ongoing challenges. Current government policies that impact our business strategy include:

- Local councils in England have seen an average cut to their budgets of almost 26% since 2010, taking inflation into account<sup>1</sup>, with 10% cuts in social services
- Our three local authorities predict budget gaps in 2018/19 of; Brighton and Hove £13.3m, East Sussex £22m and West Sussex £24m
- Predicted budget gaps for 2019/20 increase further to: Brighton and Hove £23.3m, East Sussex £17.5m and West Sussex £22m
- Future pressures on local public funding as a result of the removal of central government grants to local authorities by 2020 replaced by retention of business rates and council tax
- Risks to Public Health funding when ring-fencing of the transferred funds from Department of Health in 2013 ends in 2019
- Increases in National Living Wage (NLW) up to 2020 target now estimated to be c£8.63
- Precept on council tax to contribute to Adult Social Care
- Local integration of Adult Social Care and Health commissioning and funding requiring providers to develop new relationships, respond to different procurement processes and change service delivery models

- Regional joining up of Adult Social Care and Health to create Sustainability and Transformation Plans (STPs) to develop new ways of working to improve the longterm viability of the NHS
- Five year forward view for the NHS 2014 that set out the vision of how NHS services need to change to meet the needs of the population including placing far greater emphasis on prevention, integration of services, and putting patients and communities in control of their health
- Continued implementation of the Transforming Care agenda to increase community based housing and care services for people with complex and challenging physical and behavioural needs
- 'Improving Lives Work, Health and Disability' green paper consultation which recommends local/ regional expansion of supported employment services for disabled people based on the IPS (Individual Placement and Support) model
- Emerging national strategic focus on improving access to mental health services
- Homelessness Reduction Act introduced from May 2018 which extends local authority duties to provide advice and support to reduce homelessness
- 1% rent reduction on supported housing for three years 2017-2020
- Transition of all welfare benefit claims, including housing benefit, into Universal Credit
- New funding regime for supported housing accommodation from 2020 – currently out for consultation but proposal for new localised grant system for short-term schemes and payment through Universal Credit for long-term housing
- Brexit and the impact on inflation and European staff mobility.

<sup>1</sup> Institute for Fiscal Studies 2017

Our Learning Disability Services across Sussex support people to be happy, healthy and live independent lives

Southdown | Our operating environment

#### 4.2 Demand for services

Evidence shows that demand for the types of services provided by Southdown is increasing. This is an unfortunate but direct result of reductions in funding for public services, unaffordability of housing and increases in health and social inequality.

#### Homelessness

- Including informal 'homelessness prevention' and 'homelessness relief' activity, as well as statutory homelessness acceptances, there were 271,000 'local authority homelessness case actions' in 2015/16, a rise of 32% since 2009/10<sup>2</sup>
- 70% of local authorities are struggling to find social tenancies for homeless people, while 89% find it 'very difficult' to assist applicants into privately rented accommodation<sup>3</sup>
- Loss of a private tenancy accounted for 31% of those accepted as homeless in England and 64% in East Sussex
- Between 2015 and 2016 there was a 16% increase in people sleeping rough across the UK, and a 134% increase since 2010<sup>4</sup>
- During the same period there was a 48% national increase of people in temporary accommodation
- 78,180 households in temporary accommodation at the end of June 2017. This marks the twenty-fourth time that the number of households in temporary accommodation is higher than in the same quarter a year previously<sup>5</sup>
- Families in temporary accommodation 2016/17: East Sussex 270 (41% increase from 2015/16; West Sussex 593 (5% increase) and Brighton and Hove 1,689 (3% increase)
- In Brighton and Hove 1 in 69 people is either in temporary accommodation or sleeping on the streets (4,218 against population of 290,000)
- A search on RightMove on 11/07/18 identified no selfcontained one bed flats for rent below LHA rates across any area of East Sussex. The only accommodation below LHA was shared housing

#### Mental Health 6

- People receiving housing benefit are more than twice as likely to have a common mental health issue as those not in receipt of it (35.1% vs 14.9%)<sup>7</sup>
- The economic and social cost of mental illness is £105 billion – similar to the entire NHS budget
- One in six (17%) of people over the age of 16 have a common mental health problem
- Nearly half (43.4%) of adults think that they have had a diagnosable mental health condition at some point in their life (35.2% of men and 51.2% of women)
- Increase in common mental health problems among late-mid-life men and women (aged 55–64), suggesting that this population group may be particularly vulnerable to the impact of the economic recession
- 30% of people with a long-term physical health problem also have a mental health problem and 46% of people with a mental health problem also had a long-term physical health problem
- Mental health service users have double the rate of A&E hospital attendances compared to the general population
- Social isolation, loneliness, and living alone increased the risk of premature death. The increased likelihood of death was 26% for reported loneliness, 29% for social isolation and 32% for living alone<sup>8</sup>



<sup>\*</sup>The Homelessness Monitor: England 2018, Crisis and Joseph Rowntree Foundation

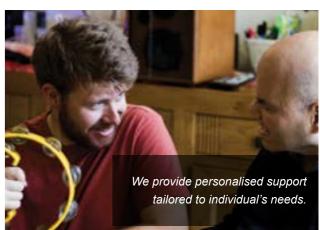
#### **Employment Support**

- Despite the general reduction in unemployment in the U.K. significant inequalities exist for disabled people in the labour market. Only 46% of all working-age disabled people are in work compared to 80% of the non-disabled population. The figure reduces to 26% for people with mental health issues<sup>9</sup>
- 1 in 2 out of work benefit claimants have a common mental health condition
- 2 million people have given up paid work to care but 315,000 working age people remain unemployed after caring responsibilities have ended

#### **Learning Disability**

- Estimated annual increase of between 2.7% to 5.1% of people with critical and substantial needs requiring adult care services by 2026 – an additional 49,000 to 116,000 people each year
- By 2030 the number of adults with learning disabilities aged 70+ using social care services will more than double
- 1,300 individuals currently placed in Assessment and Treatment Units that national strategy aims to rehouse in community settings by 2020
- Projected increase in demand for specialist Supported Housing from 38,500 units in 2015 to 59,800 units in 2030<sup>10</sup>





<sup>&</sup>lt;sup>2</sup> The Homelessness Monitor: England 2017 JRF

<sup>&</sup>lt;sup>3</sup> The Homelessness Monitor: England 2018 JRF

<sup>&</sup>lt;sup>4</sup> Homeless Link 2017

 $<sup>^{\</sup>rm 5}$  Households in Temporary Accommodation: House of Commons Library Oct 2017

<sup>&</sup>lt;sup>6</sup> Fundamental Facts about Mental Health 2016: Mental Health Foundation

<sup>&</sup>lt;sup>7</sup> Friedli, L. (2009). Mental health, resilience and inequalities. WHO

<sup>&</sup>lt;sup>8</sup> Holt-Lunstad, J., Smith, TB., Baker, M., Harris, T., & Stephenson, D., (2015). Loneliness and Social Isolation as Risk Factors for Mortality:

Mental Health and Employment: TUC 2017
 Funding Supported Housing for All, Mencap & Housing LIN 2018

Southdown | Our operating environment

Business Strategy 2018-2023

#### 4.3 Challenges

Our sector is facing unprecedented change and there are numerous issues that could impact on our ability to continue to provide services to our agreed quality standards while remaining financially viable. We have undertaken detailed assessment of the various risks facing us within our organisational strategic risk framework and annual stress testing review.

The top risks and challenges we have identified that we need to respond to in 2018/19 are:



#### 1. Securing fee increases to meet rising costs

Our five year plan requires a minimum fee uplift of 3% p.a. for Learning Disability contracts and 1% for Community Support Services to cover inflationary and mandatory increases in costs. Although we can attempt to control non-staff costs as part of our value for money strategy, we are restricted from limiting increases in staff costs, particularly those associated with legislative changes such as NLW, auto-pension enrolment and payment of annual leave for obliged overtime. On top of enforced rises in salaries we are also under pressure to pay inflationary awards to staff to remain competitive and enable them to cover rising living costs.

If we are unable to secure these fee increases we will need to either negotiate with commissioners to reduce service capacity or consider withdrawing from some contracts. The situation is more acute for learning disability services where support hours are based on clients' assessed individual needs and require 100% cover. In these circumstances it is not possible to reduce provision and hourly rates are critical to the financial viability of services.



#### Our response

- Lobby through trade bodies and provider groups for fee increases
- Lobby Government and local politicians on the impact of insufficient funding for social care
- Engage with commissioners (as part of their duty to undertake market position statement reviews) to highlight the need for fee increases to sustain service contracts and overall business viability
- Model impact of differential fee increases in our five year plan and risk stress testing
- Develop strategies and actions plans for each business area to address the impact of insufficient or no fee rises

### 2. Loss of public funding for prevention support services

East Sussex County Council have stated in their mid-term financial plan that by 2020/21 due to needing to achieve substantial financial savings they will no longer be able to fund or provide any prevention support services. Instead they see that their adult social care role will be restricted to the provision of services for people with significant or critical needs. They accept that reduction in prevention services will directly lead to increased demand for social care and health statutory services, but feel that they have no alternative.

In 2018/19 this has already resulted in a proposed 50% (£1.6m) cut to our Home Works homeless crisis prevention service. As homeless reduction is not a County Council direct responsibility there is a real danger that funding for similar services may be under threat and District and Boroughs, although holding a new homeless reduction duty, may not fund services to the same degree. Not only does this reduce our income, but more importantly vulnerable clients and families will have less support to help resolve major personal issues.

#### 3. Ability to maintain adequate staffing levels

Even if we are able to secure adequate fee increases to stabilise the financial sustainability of learning disability services, we face a significant challenge to be able to recruit and retain adequate staffing levels to effectively manage quality and risk factors.

The overall staff turnover rate for 2017 was 17% and 38% of leavers had less than one year of service. Due to increased competition from other non-care sectors we now receive on average only 1.6 applications for every learning disability job advertised. We face particularly issues for services based in more rural areas with poor transport links where staff are likely to need to run a car to be able to travel to work.

During 2017 issues with recruitment have led to an average vacancy rate of 6%, but for some services this was 22%. To cover shifts we have required other staff to work overtime and have used agency staff.

#### Our response

- Publish reports that demonstrate the impact of crisis prevention services and the reduction in costs/demand to statutory services
- Develop and implement a lobbying campaign to protect funding for crisis prevention services
- Work in partnership with local housing authorities to link our homelessness prevention services with their new statutory duties under the Homelessness Reduction Act
- Look at other funding sources to maintain services to vulnerable clients
- Model impact of funding cuts as part of risk stress testing
- Develop strategies and action plans for each business area to address the impact of funding cuts

#### Our response

- Continue delivery of our recruitment and staff engagement strategies to ensure we are best placed in an ever increasing competitive market to recruit and retain staff
- Further develop our internal staffing metrics to provide monthly reports on vacancies, overtime and agency usage and recruitment so we are able to respond as quickly as possible to changing workforce issues and risks
- Include staffing capacity and risks into the strategic reviews of LD and CSS operational activities

Southdown | Our operating environment

#### 4. Learning Disability Voids

During 2017 we experienced a sharp increase in vacancies across our learning disability services following the deaths of a number of clients and lengthy delays in receiving suitable new referrals. This has resulted in a loss of 3% of income against a budget assumption of 1.5%. Delays have been caused due to a lack of appropriate referrals to services and/or slow processing and agreement of funding packages by commissioners. Although we look to reduce staffing resources during the vacancy period, this cannot be achieved quickly or fully cover the lost income (e.g. shared management, property and night-time cover).

Experience would indicate that 2017 appears to have been an exceptional year, but it does highlight the significant impact that delays in referrals creates on the overall viability of the division. We have raised this issue with commissioners in relation to their role to help manage the provider market, and are looking to agree risk sharing agreements.

#### 5. New funding regime for supported housing

The Government review of the payment of rents for supported housing through the welfare benefit system went out for consultation late 2017. The proposal which would come into force from 2020 suggests three options dependent on the definition and nature of the accommodation.

Although yet to be finalised, we do hold concerns that elements of the proposals hold risks in relation to; autonomy to set rents to cover costs; future decommissioning of support contracts; independence skill training for tenants if not liable for rent, Universal Credit system inflexibility and long-term funding insecurity impacting on ability to develop new homes.

#### Our response

- Launch new void and referral management procedures with target timescales for all activities
- Take a more assertive approach with commissioners to work in closer partnership to speed up referral and care package authorisation processes
- Attempt to negotiate with commissioners to share financial risks for voids
- Work with commissioners to consider viability for services which experience long-term voids

#### Our response

- We have submitted a consultation response and will continue to raise the issues with local stakeholders
- Ensure all properties are identified as 'supported housing' with local authorities
- CEO to participate in National Housing Federation reference group on development of funding mechanism via Universal Credit for longterm supported housing
- Aim to maximise the number of supported housing units we manage

#### 6. Universal Credit

With the roll out of Universal Credit (UC) for new claims now affecting many parts of Sussex, and transfer of all legacy claims commencing late 2018, we have identified the significant risk both on our rental collection rates as well as the impact on the community clients our staff support. A local provider in West Sussex experienced UC claimants' arears of 16-24% over the first six months of claims compared with 1.6% across their whole stock.

Although as a supported housing provider our tenants should currently have their housing benefit claims processed outside of UC, the systems do not always work well in identifying accommodation as supported housing.

Going forward, linked to the future funding regime mentioned above, risks will increase as current proposals for long-term housing is for all claims to be processed through UC. There is also concern as at present the UC system does not deem enhanced tenancy management costs as an eligible service charge.

#### 4.4 Opportunities

In line with our mission we would like to increase the number of vulnerable people we can support to overcome their personal challenges and reach their full potential. Current funding restrictions mean this is going to be harder to achieve, but by evolving our business activities over recent years, we have been able to continue to expand the number of clients we support.

We believe this success is based on us adopting a flexible and solution focused approach, working with commissioners to understand their changing needs and priorities, and developing new evidence based models that make best use of available resources. We are confident that we are well placed to further expand our offer as a local 'go-to' trusted third sector provider as part of evolving new Accountable Care environments.

Business opportunities may come across every part of the organisation and we will consider each on its' own merits, linking back to our core visions and mission. We will also carefully consider our capacity to deliver new contracts without impacting on existing service quality.

#### Our response

- Maintain our internal UC working group to help us prepare for the changes
- Ensure up until 2020 claims continue to be processed under Housing Benefit outside of UC
- Increase investment in dedicated financial inclusion staff resources to support tenants to manage the transition to UC
- Closely monitor collection rates



Southdown | Business Strategy 2018 - 2023
Business Strategy 2018 - 2023

## 5. Business Strategy 2018 - 2023

Our sector is undergoing rapid and complex change. We have a proven track record of navigating successfully through difficult and uncertain times and are confident that by understanding fully the issues and planning appropriate and timely responses we can continue to maintain a resilient business providing much-needed services.

Our business decisions are based as far as possible on reliable and relevant data. As part of the business strategy process we have reviewed the strengths, weaknesses, opportunities and threats for the organisation over the coming years. We have used this process to guide the development of our business plan and budget for 2018/19, as well as to update the longer-term strategies for our different business areas and the five-year financial plan.

The key priorities and activities for Southdown during the next five years are:

- Retain our position as a leading provider of high quality, personalised support to vulnerable clients
- ✓ Provide safe, caring and professional services in line with our core values
- Maximise the number of people we can support to overcome their personal challenges and reach their full potential
- Increase the number of social rented housing units we own and manage
- Maintain a sustainable financial position through retaining existing contracts and negotiating for inflationary fee increase (or reducing capacity) to cover rising costs
- Continue to meet all current contract performance indicators, quality standards and staffing capacity
- Where we are unable to achieve agreed financial, quality and risk management standards to consider alternative options including planned exit

- Maintain effective relationships with local authorities and be seen as the local 'go-to' trusted provider
- Identify, assess and respond to new opportunities, working with commissioners and other agencies to find innovative solutions to meet emerging and changing needs and priorities
- Clarify and promote the 'Southdown brand' to enable us to be considered for new areas of work where we can demonstrate transferable skills and experience
- Balance new business activity with other competing priorities ensuring that we fully consider the impacts of growth and diversification on existing services and staff resources
- Jobs graded and remunerated fairly within the Association and competitively for the wider sectors with which we're competing
- √ Attempt to help lower paid staff in-work poverty
- Maintain high levels of staff engagement
- Integrate staff and client feedback to continue to improve quality, responsiveness and deliverability of services
- Streamline systems to maximise efficiency and value for money
- Respond to changing Government strategies and regulatory standards through effective governance and risk management



# 6. Strategic Objectives and Targets 2018 - 2023

The projects and activities to achieve the agreed Business Strategy for each financial year are detailed in the Organisational Business Plan, set against our eight core business objectives. Performance is monitored on a quarterly basis with reports to the Executive Team and Board.

To demonstrate the effectiveness of the Business Strategy to meet the organisational aims we set, monitor and report against longer-term measurable strategic objectives.

Business Objectives	Goal	Five year strategic objective
Financial sustainability	Maintain viable long-term financial plans and liquidity	<ul> <li>Achieve overall 2%+ margin by 2019/20</li> <li>LD to achieve breakeven position by 2021/22 and 2%+ margin by 2023/24</li> <li>Increase reserves to £6m over five years to invest in new housing and trials of new models of support</li> </ul>
Competition and growth	Maximise the number of people we support	<ul> <li>Maintain income and number of clients supported even though may be via different funding routes</li> <li>Achieve £500k new business each year</li> </ul>
Quality housing	Provide accommodation that meets tenant and commissioner needs	<ul> <li>Develop 20+ units of accommodation</li> <li>Repairs attended on time above 95%</li> <li>Repairs completed first time above 90%</li> <li>Repair satisfaction return rate above 40%</li> <li>Achieve 90%+ satisfaction levels in 2018 survey</li> </ul>
Quality staff resources	Recruit, develop and retain skilled, confident, resilient and caring staff and managers	<ul> <li>Turnover 14% or less</li> <li>Sickness 4% or less</li> <li>95% staffing level cover in all business areas</li> <li>liP gold reaccreditation 2020</li> <li>Maintain paying staff fairly and avoiding in-work poverty for lower paid staff</li> </ul>
Quality client support	Recognised as the leading provider of quality services	<ul> <li>Achieve 'good' Care Quality Commission ratings</li> <li>All services to achieve 90%+ client satisfaction ratings across all areas</li> </ul>
Evidencing our impact	Demonstrate the total impact of support services	<ul> <li>Achieve national best practice awards</li> <li>Meet all contract KPIs</li> <li>Publish impact reports demonstrating outcomes achieved for clients and prevention of costs to other statutory services</li> </ul>
Business efficiency	Robust, effective and value for money use of available resources to enable business continuity	<ul> <li>Central costs average of 10.5% over five years</li> <li>To be in top quartile of Acuity Benchmarking for supported housing</li> <li>Maintain ISO9001 quality accreditation</li> <li>Invest in programme of external audits assessing against national best practice and compliance</li> </ul>
Effective Governance	Well led, managed, safe and compliant organisation	<ul> <li>Regulator of Social Housing compliance</li> <li>Care Quality Commission compliance</li> <li>100% gas compliance</li> <li>98% total overall property safety compliance</li> </ul>

Southdown is an exempt charity and a registered society under the Co-operative and Community Benefit Societies Act 2014. Due to the range of services we provide we are registered and regulated by a number of bodies including:

#### **Homes England**

Registered, monitored and comply with Regulatory Framework

#### **CQC (Care Quality Commission)**

Registered, monitored and work to Regulatory Standards

#### FCA (Financial Conduct Authority)

Registered, monitored and work to Regulatory Standards

#### ICO (Information Commissioner's Office)

Registered, Data Protection Officer: Vikki Hayward-Cripps, Deputy Chief Executive

#### **NHF (National Housing Federation)**

Member and work to best practice standards

Contracts are subject to further scrutiny by Local Authorities, Health Authorities and other commissioners/funders.

#### Southdown Housing Association

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Southdown-Housing-Association

