

**An tÚdarás Rialála Comhlachtaí
Tithíochta Ceadaithe**

Approved Housing Bodies
Regulatory Authority



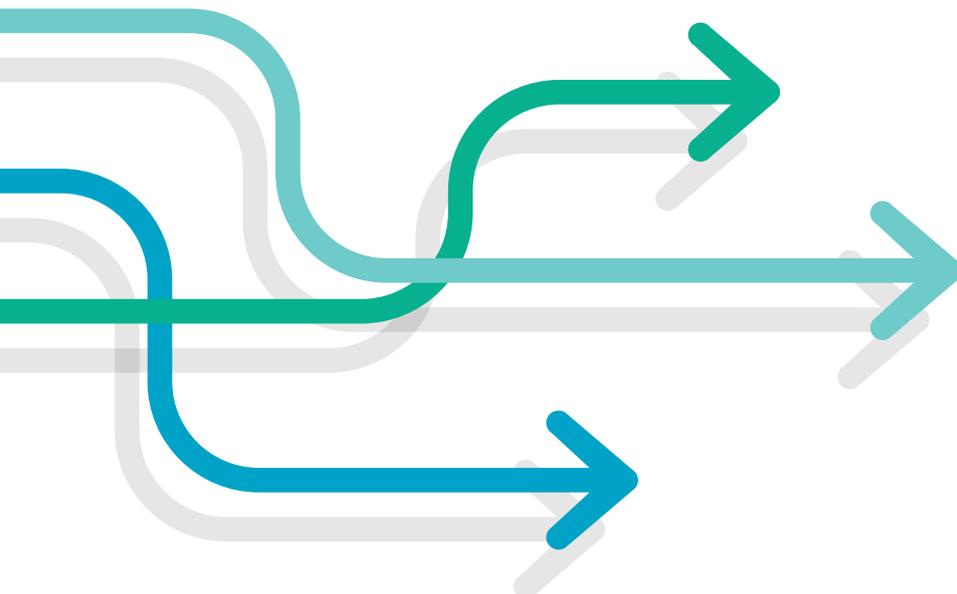
Statement of Strategy 2021-2024

Approved Housing Bodies
Regulatory Authority

ahbregulator.ie

Contents

Foreword	02
Context	04
About AHBRA	08
Statement of Strategy	11
Vision, Mission and Values	12
Our Organisation	14
Key Stakeholders	16
Implementing our Strategy	18
AHBRA's Strategic Objectives	21





Foreword

The Approved Housing Bodies Regulatory Authority (AHBRA) was established on 1st February 2021 by the Minister for Housing, Local Government and Heritage, Darragh O’Brien TD.

The Regulatory Authority has been established to oversee the effective governance, financial management and performance of all Approved Housing Bodies (AHBs), in accordance with the legal framework set out in the Housing (Regulation of Approved Housing Bodies) Act 2019.

We are delighted to introduce AHBRA’s first Statement of Strategy. Our Strategy Statement covers the period 2021 to 2024 and it outlines how we intend to deliver on our mandate over the next three years.

Approved Housing Bodies (AHBs) play a vital role in the provision of social housing in Ireland. This important not-for-profit sector continues to expand significantly and play a leading role in the supply of new social housing.



Statutory regulation will be positive for AHBs, tenants, potential investors and other stakeholders. It will enable the protection of housing assets, safeguard public investment, encourage private investment and promote long-term strategic thinking.

Historically, AHBs were 100% grant funded by the State. However, this has changed in recent times, with a move away from grant funding towards a mixture of government grant and loan financing. The sector developed and evolved gradually over the last 20 years and it did so in a relatively low-risk environment. However, the increased demand for housing, the change in funding mechanisms and the requirement for the AHB sector to attract more diversified funding, have changed both the delivery and risk profiles of AHBs.

The range of services provided across the AHB sector means that organisations are governed by a number of regulatory regimes, including those providing care and support. AHBRA will need to establish co-operation with other regulatory bodies in order to ensure a consistent, effective and proportionate approach to the regulation of AHBs.

The successful introduction of voluntary regulation over seven years ago, provided an important assurance framework for all stakeholders, including tenants, the Exchequer, Boards and potential investors. The move to the statutory regulator is a substantial milestone for the sector.

Statutory regulation will be positive for AHBs, tenants, potential investors and other stakeholders. It will enable the protection of housing assets, safeguard public investment, encourage private investment and promote



long-term strategic thinking in the provision of social housing.

Experience in other jurisdictions has indicated that well-designed regulation can foster stakeholders' confidence and create an environment that encourages growth and innovation.

Over the next three years, we will introduce effective and robust regulation, which is transparent, accountable and proportionate, focusing on key risk areas. We will design our compliance and assessment frameworks in an effective manner, taking into account the complexity of the sector, while seeking assurance that AHBs comply with the law and their statutory obligations. We will increase awareness and understanding of best practice.

We will look to develop strong working relationships with other regulatory bodies, and provide important sectoral analysis for AHBs, regulators, funding bodies, and key stakeholders.

This Strategy Statement sets out our vision, mission, key values and desired outcomes for the period 2021–2024. We look forward to working with AHBs, the Department of Housing, Local Government and Heritage (DHLGH), partners, Regulators, and key stakeholders to realise our vision of stable and sustainable AHBs.

A handwritten signature in black ink, appearing to read 'E Lewis'.

Eddie Lewis

Chair
AHBRA
July 2021

A handwritten signature in black ink, appearing to read 'Susanna Lyons'.

Susanna Lyons

CEO
AHBRA
July 2021





Context

The Housing (Regulation of Approved Housing Bodies) Act 2019 provides for the regulation of Approved Housing Bodies (AHBs) for the purposes of protecting housing assets provided or managed by such bodies.

It seeks to support stronger governance, financial management and reporting, property and asset management, and tenancy management by AHBs, with a focus on safeguarding investment being made in the delivery of social housing by AHBs. Central to this, is the establishment of the Approved Housing Bodies Regulatory Authority.

The Act and AHBRA when fully operational, will provide stronger assurance to tenants, the public and key stakeholders that the AHB sector is well regulated.

Over the next three years, we will work to fully establish the regulatory framework that will deliver effective oversight of all AHBs, in accordance with powers and functions conferred upon us, by the Act.

AHBs, also called housing associations or voluntary housing associations, are independent, not-for-profit organisations whose purpose includes the provision and management of housing for households in housing need. Currently, there are 470 AHBs registered with the DHLGH. These organisations range significantly in size, scale, funding and delivery models.

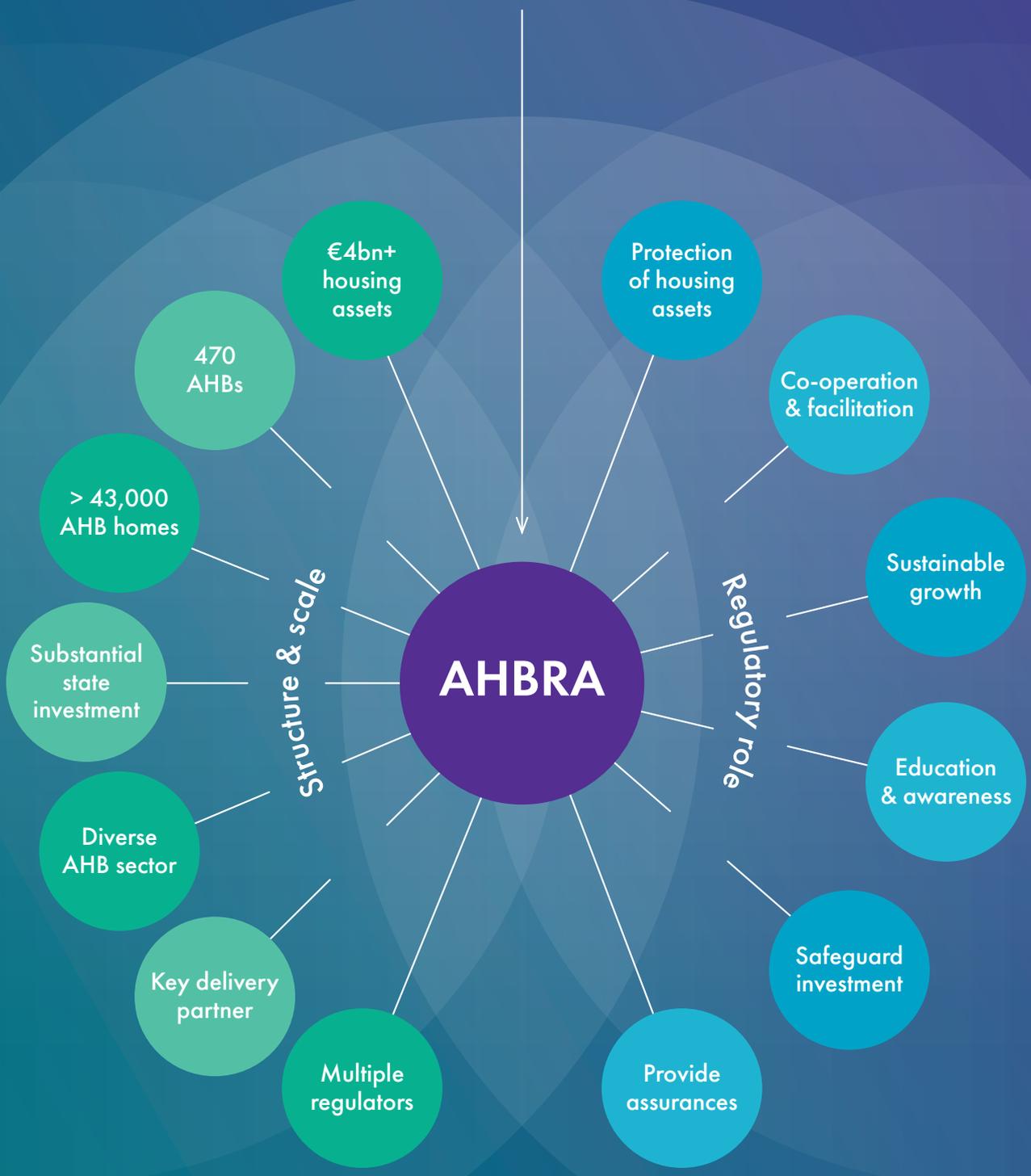
The introduction of AHBRA follows seven years of voluntary regulation, which was the precursor to the legally binding statutory regulatory framework. The Voluntary Regulatory Code (VRC) provided a measure of regulatory oversight of AHBs, accompanied by a programme of guidance and education. The VRC proved a valuable learning environment for all stakeholders.

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The Act and AHBRA when fully operational, will provide stronger assurance to tenants, the public and key stakeholders that the AHB sector is well regulated.



Established by law under the
Housing (Regulation of Approved
Housing Bodies) Act 2019





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Over the life of this strategy statement, we will create a new regulatory environment for all AHBs.

Additionally, it provided important insights into the AHB Sector including the size, scale, delivery, funding and diversity of AHBs.

In its last Annual Report, the voluntary regulator reported that 285 AHBs with over 43,000 homes had signed up to the voluntary environment. The sector is comprised of many parish based AHBs managing a small number of homes, AHBs whose primary focus is care and support, and a small number of large and growth AHBs. This last group manages over 80% of the housing for the entire sector, has assets of more than €4bn and associated rental income of €88m per annum.

AHBs have played a central role in housing delivery. It is expected that this role will continue to expand under the Government's 'Housing for All', with a number of AHBs identifying substantial growth plans over the coming years. The AHB sector has expanded and changed in recent years, with a focus on capacity-building and the introduction of new financial models and funding mechanisms, supported by predictable funding streams.

It is within this context that AHBRA has been established, tasked with providing a regulatory framework that will enable the AHB Sector to grow in a sustainable manner, and providing assurances to tenants, Boards, investors and the Exchequer.

Over the life of this strategy statement, we will create a new regulatory environment for all AHBs. We will introduce a transparent, robust and fair regulation framework, focusing on key outcomes, establishing effective and co-operative relationships, building strong communication with key stakeholders and providing regulatory assurances to the government, tenants and funders.

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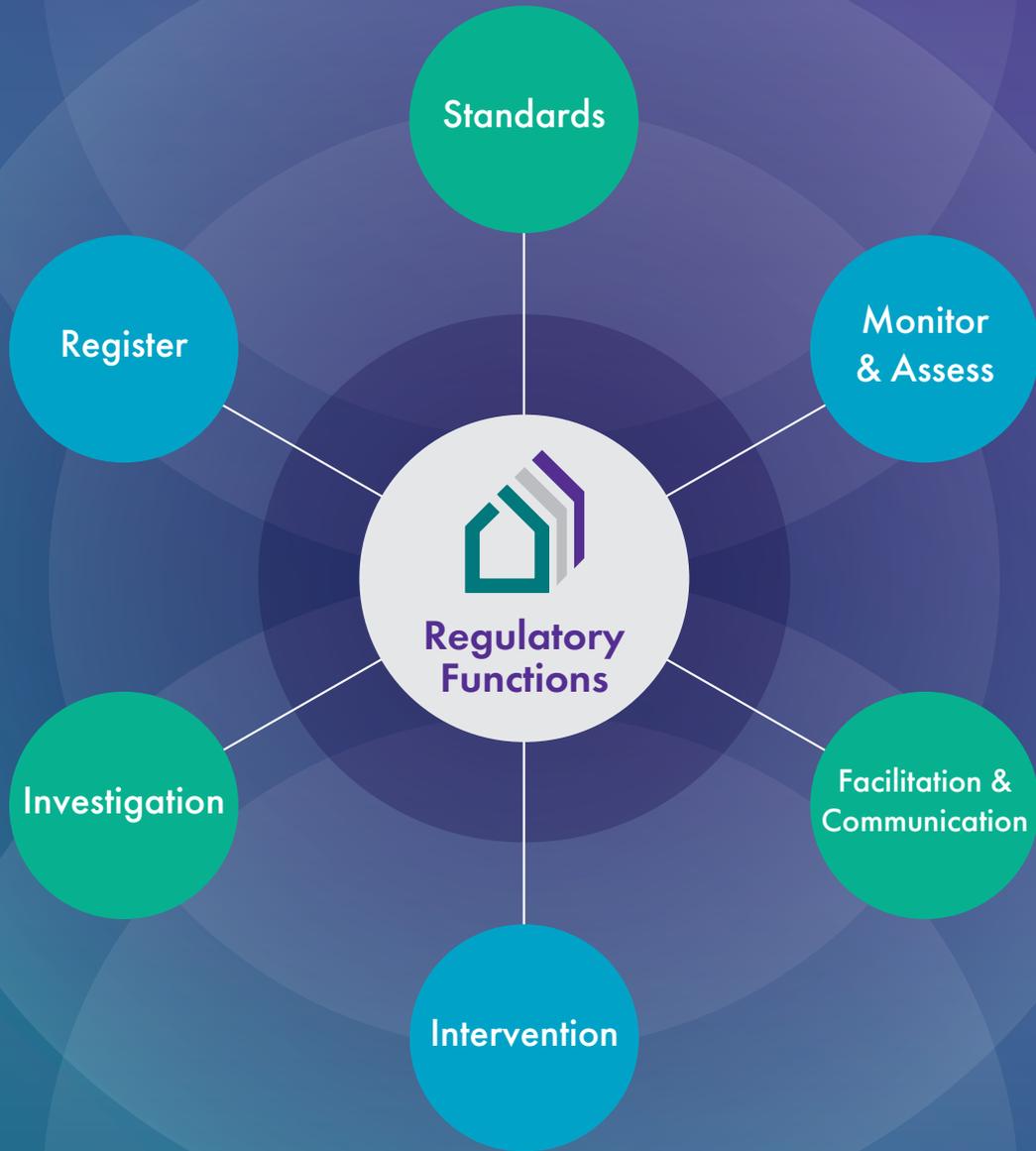


About AHBRA

AHBRA was established on 1st February 2021 as an independent body, charged with the regulation of AHBs, for the purposes of protecting housing assets provided or managed by such bodies.

The key functions of AHBRA as set out in the legislation are to:

- Establish and maintain a register of AHBs
- Register persons as AHBs
- Prepare draft standards for approval by the Minister, publish the approved standards, and monitor and assess compliance by AHBs with the approved standards and with the legislation more generally
- Carry out investigations in accordance with the Act
- Protect tenants and AHBs and cancel the registration of AHBs
- Encourage and facilitate the better governance, administration and management, including corporate governance and financial management, of AHBs by the provision of information and advice
- Promote awareness and understanding, and make available to the public information about the operation of the legislative arrangements being introduced under the Act
- Collect information concerning AHBs for the purposes of the performance of its functions
- Publish such information (including statistical information) concerning AHBs, as appropriate.





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We will establish and implement a regulatory framework including registration, standards, monitoring and compliance. Where necessary, we will utilise our powers.

Statement of Strategy

This Statement of Strategy is prepared in accordance with Section 20 of the *Housing (Regulation of Approved Housing Bodies) Act 2019*. Its development has been informed by best practice and regard for the delivery of regulatory frameworks in other jurisdictions.

Our strategy statement provides an outline of our vision, mission, values and the key objectives to be achieved over the first three years of our activity. It aims to provide assurances to stakeholders that we will deliver a robust, resilient and reliable regulatory authority, operating in an open, accountable manner with a focus on consistency, fairness and proportionality.

The strategy aligns our purpose to the statutory functions and the powers conferred by the governing legislation. It seeks to reflect the AHB sector and the policy environment within which we will operate. It also considers our operational capability and capacity, our people and technological resources.

As a regulator, we will establish and implement a regulatory framework including the registration of AHBs, the setting of standards, monitoring and assessing compliance with the standards and, as required, undertake investigations. Where necessary, we will use the appropriate enforcement powers.

We will implement risk-based regulation, focusing on those AHBs which are identified as higher risk and/or cannot demonstrate or evidence compliance. We will introduce and embed a system for reporting, data gathering and analysis over the lifetime of the strategy, enabling improved, robust data and information collation for the sector.

We will also provide guidance and support to AHBs, encouraging and facilitating better governance, financial management, property and tenancy management by AHBs.

As a newly established regulatory authority, overseeing a broad and diverse set of organisations, we will need to co-operate closely with other regulators and public bodies which have a role in this area. An important element of our strategy implementation will be to ensure that we actively partner with key regulators, such as the Charities Regulatory Authority and the Residential Tenancies Board. The aim will be to ensure consistency and transparency in decision-making and, where possible, reduce regulatory administration.

This first strategy statement provides measurable and attainable goals for the organisation in its early years. Over the three-year period, we will complete annual business plans outlining our actions, milestones and performance indicators on which we will report annually, providing transparency for all stakeholders.



Vision, Mission and Values



Our Vision

Our vision is of a sector in which AHBs demonstrate best practice in the areas of governance, finance, property and tenancy management and who provide quality homes for their tenants.



Our Mission

Our mission is to protect housing provided and managed by AHBs, through effective regulation.

Our Values



We will **operate with integrity**, ensuring consistent adherence to our principles



We will deliver **independent, proportionate and fair** regulatory oversight



We will be **accountable and transparent** in our decision-making



We will work with key stakeholders in a **co-operative manner**



We will **strive for innovation** in our delivery of regulation



Our Organisation

The Board

The Board of AHBRA is responsible for setting the strategic direction of the organisation. It is currently comprised of nine members, with extensive expertise in housing, local authority matters, legal, finance, governance, operations and regulation.

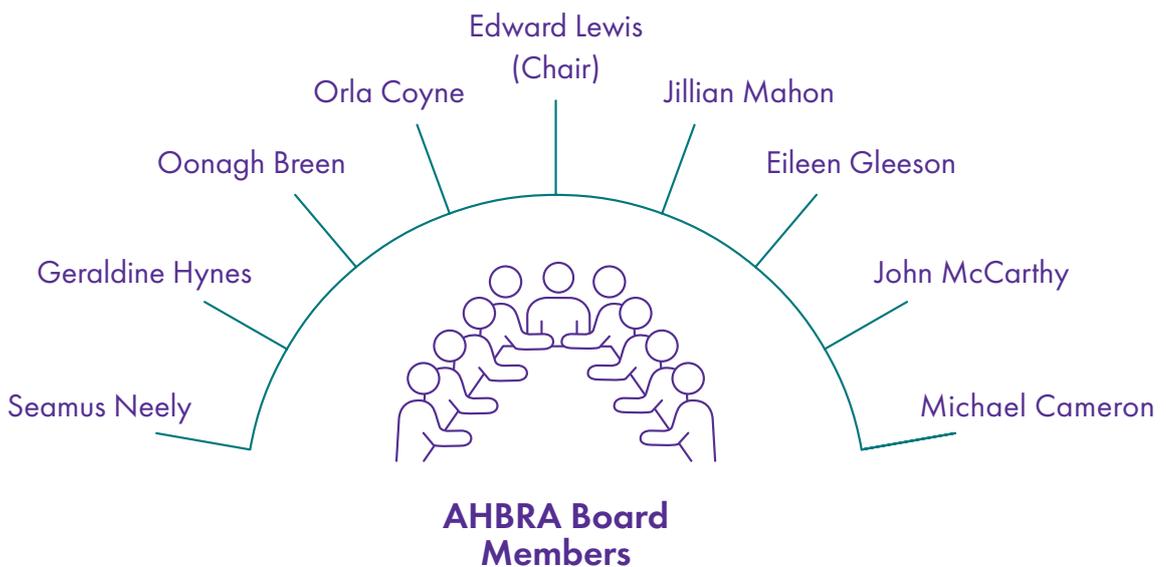
The Minister for Housing, Local Government and Heritage appointed the nine Board members for the period 11th February 2021 to 10th February 2026.

Governance

Our corporate governance arrangements are determined by our governing legislation and the Code of Practice for the Governance of State Bodies. Additionally, the relationship with the Department of Housing, Local Government and Heritage is governed by a specific oversight agreement.

The Board is supported in its work by an Audit & Risk Committee, a Governance Committee and an Operations Committee. The terms of reference of the sub-committees will remain under review by the Board over the lifetime of the strategic statement.

We will review our governance arrangements annually to ensure compliance with our statutory obligations and continuous adherence to best practice.



Organisational Structure

AHBRA is funded by the Exchequer through an annual allocation from the Department of Housing, Local Government and Heritage. The allocation for 2021 is €1.2 million, including a staffing complement of twenty-two. The Chief Executive is responsible for the day-to-day management and administration of the Authority.

The current level of staffing is premised on substantial investment being made in information, communications and technology infrastructure over the life of this strategy statement. We will regularly review our staffing requirements to ensure they are properly aligned to our deliverables and objectives.

AHBRA organisational chart





Key Stakeholders

AHBRA is committed to building excellent communications and co-operative relationships with key stakeholders.

The AHB sector is complex and layered, with a large number of AHBs differing in size, scale, delivery models, funding structures and risk profiles. Additionally, we are entering a multifaceted regulatory environment with several regulators, funders and oversight agencies.

We are committed to working with our key stakeholders to promote a full understanding of our legislative remit. In particular, we will seek to work with other regulators and public bodies, including the Charities Regulator, the Residential Tenancies Board (RTB),

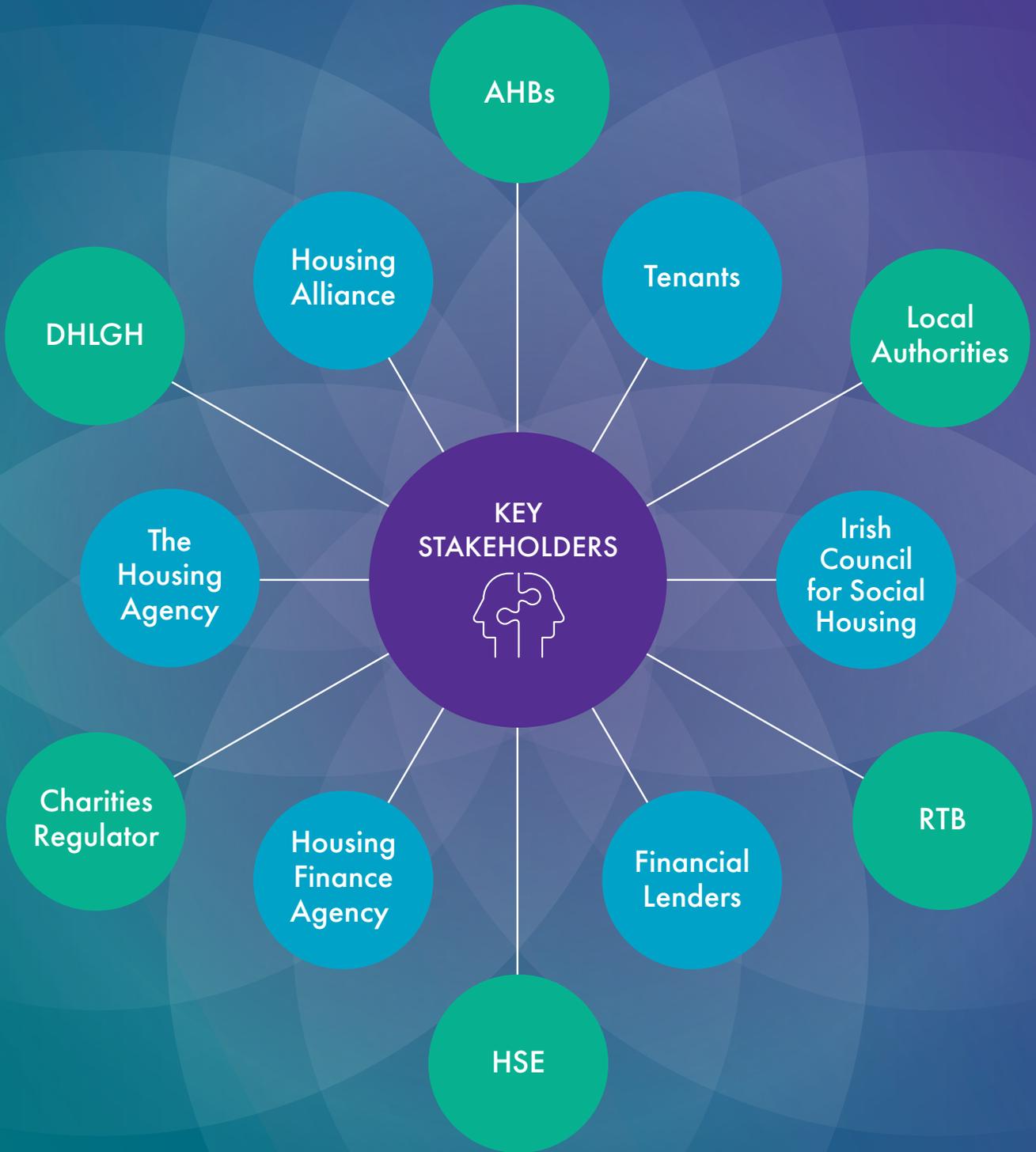
Local Authorities and the Health Service Executive (HSE), facilitating administrative co-operation and sharing best practice, information and knowledge, where appropriate.

While it can be expected that our regulatory oversight of AHBs should provide increased assurances to AHB tenants regarding the overall governance and operation of their AHB landlords, the RTB remains the statutory body with responsibility and oversight of individual tenant/landlord arrangements.

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We will seek to work with other regulators and public bodies, including the Charities Regulator, the Residential Tenancies Board, Local Authorities and the HSE.







Implementing our Strategy

As part of our governance and strategic statement, we will endeavour to provide quality information, data and performance indicators. We will report on our key findings, regulatory outcomes and our objectives in a transparent manner.

We will publish an Annual Report, in line with our legislative remit. The Annual Report will provide detailed information on our performance against targets as set out in our strategic statement and annual business plans. Additionally, we will publish our financial statements annually, which will be audited by the Comptroller and Auditor General.

We will produce annual business plans aligned to our strategic objectives. The business plans will also identify the risks and opportunities facing our organisation and the risk appetite of our Board as it evolves over the course of this strategic statement.





AHBRA's Strategic Objectives

In the delivery of this Strategic Statement, we will aim to achieve the following five key strategic objectives:

- 1 Reliable and efficient AHB Registration Framework
- 2 Proportionate standards and compliance frameworks
- 3 Transparent and consistent risk-based regulation
- 4 Consistent and effective communication with our stakeholders
- 5 An agile, flexible and accountable organisation



Strategic Objective 1



Reliable and efficient AHB Registration framework



Goals



- Establish and maintain a reliable AHB register, in accordance with the legislation
- Embed effective and efficient registration process for all AHBs
- Obtain comprehensive information and data relating to registered AHBs
- Develop and embed registration policy, process and procedures
- Publish information relating to AHBs on the Register
- Develop ICT systems for registration management
- Create transparent framework for the cancellation of registration



Outcomes



- Published Register
- Information and data analysis of 'Deemed' organisations¹
- Segmentation of AHB sector based on available information and data from registration programme
- Awareness and understanding of AHBRA registration programme
- Transparent and efficient system of registration
- Enhanced compliance with eligibility and registration requirements
- Reliable information held and published in the AHB register
- Continuous advancement of the digitisation of the register and registration programme



Summary

AHBRA maintains a consistent, transparent and accurate register. The registration programme is effective and understood by participants. The AHB Register provides quality, accurate and timely information.

¹ Deemed organisations as defined under Section 34(1) in the Act



Strategic Objective 2



Proportionate standards and compliance framework(s)



Goals



- Develop and publish draft standards in accordance with the legislation
- Consult with the AHB Sector on draft standards
- Publish standards relating to Governance, Finance, Property and Asset Management and Tenancy Management by AHBs
- Develop and issue guidance on standards
- Develop and deliver an open and transparent evaluation framework
- Establish assessment and compliance programme, in accordance with the legislation
- Develop framework relating to non-compliance including investigations and enforcement
- Publish policy, process and procedures relating to standards, guidance, best practice and compliance
- Deliver communications and education programmes



Outcomes



- Publication of approved standards
- Transparent and proportionate assessment and compliance programme
- Increased awareness and understanding of standards and compliance requirements across AHBs
- Publication of guidance
- Continuous education programme delivered by AHBRA
- Established regulatory reporting framework
- Publication of accurate and consistent data and information relating to the AHB Sector



Summary

Standards, evaluation and compliance framework is transparent and proportionate. Compliance with standards is enhanced through continuous education programmes.





Strategic Objective 3



Transparent and consistent risk-based regulation



Goals

- Create and embed a risk-based regulatory framework
- Build a regulatory framework aligned to information and data, enabling informed decision-making
- Develop regulatory and assessment frameworks for the application of risk-based regulation
- Establish a risk-based regulatory approach and risk matrix
- Utilise data and information sets from registration programme and identify risk trends and concentrations
- Develop and formalise regulatory structures relating to non-compliance and/or breaches of legislation
- Build an investigation and enforcement framework based on regulatory findings and outcomes
- Develop and embed policy, process and procedures for risk-based regulation
- Develop and embed ICT enabling digitalisation of risk-based regulation



Outcomes

- Consistent risk-based regulatory framework
- Transparent risk-based matrix and application of proportionality
- Regulatory reporting
- Educational programmes aligned to risk trends and concentrations
- Regulatory approach that is appropriate, measured and proportionate
- Appropriate use of powers, following due process and diligence
- Increased awareness of risks in the AHB Sector
- Delivery of a number of relevant publications, including education, advice and best practice



Summary

Risk-based regulation is evaluated on information and data, with a consistent approach to decision-making. AHBs actively engaged in managing risks and applying best practice. Investigation and enforcement utilised where appropriate.



Strategic Objective 4



Consistent and effective communication with our stakeholders



Goals



- Creation of effective communications enabling strong stakeholder engagement
- Gathering and analysis of key statistical information
- Develop and implement communications strategy and plan
- Deliver guidance and education programmes
- Establish consultation forums with stakeholders on work of the AHBRA
- Build effective relationships with other regulators and government agencies
- Develop online presence
- Implement and embed communications policy and procedures



Outcomes



- Enhanced communications with stakeholders
- Awareness and understanding of the regulatory environment and requirements
- Education and guidance programmes
- Publication of relevant guidance, advice and best practice
- Effective co-operation and communication with key regulators and government agencies
- Working arrangements with other regulators including development of memorandums of understanding
- Transparent and accessible information and data on AHB Sector



Summary

Independent regulation delivered with effective communication with key stakeholders. Co-operative and consistent approach across regulatory bodies.



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We are committed to working with key stakeholders to ensure transparency, promotion and understanding of the legislation.



Strategic Objective 5



An agile, flexible and accountable organisation



Goals

- Deliver an effective and efficient organisation with ability to deliver on its key objectives
- Establish and embed a properly governed, transparent and independent decision making body
- Create an organisation with focus on staff development and continuous improvement
- Create a culture within the organisation that reflects integrity, accountability, flexibility and agility
- Promote and support staff training and development
- Embed HR policies and procedures
- Develop digital technologies providing effective and efficient regulatory delivery



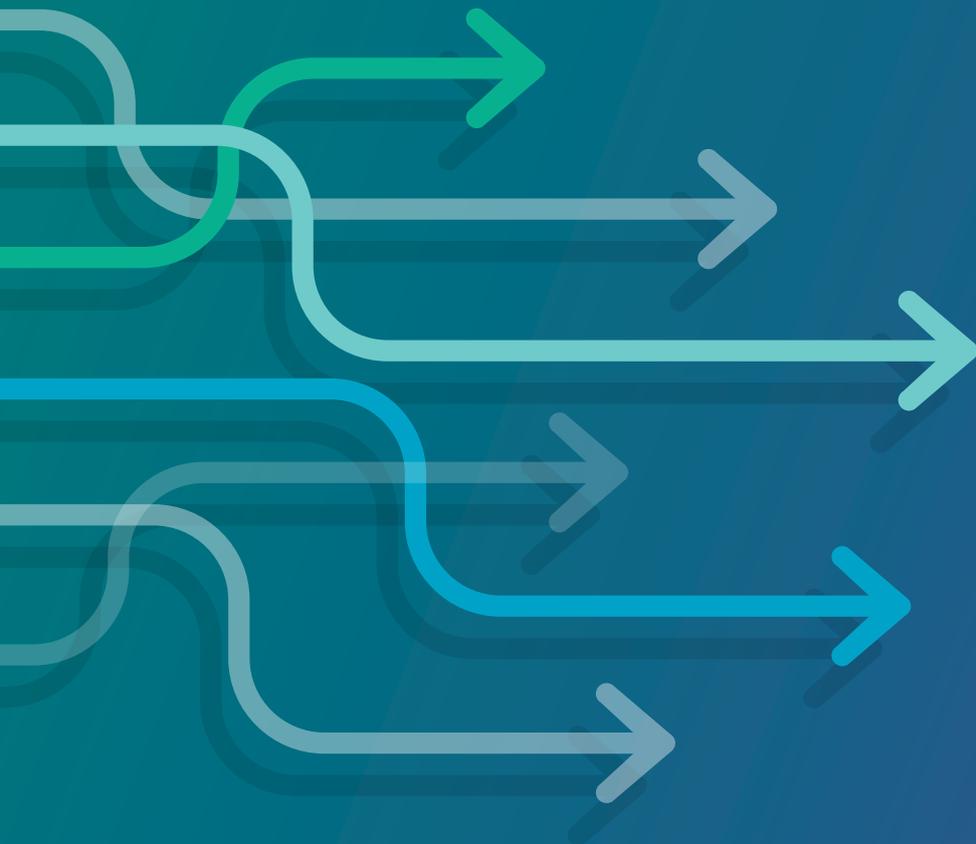
Outcomes

- Culture of integrity and focus on consistent decision-making
- Motivated and engaged Board and staff
- Delivery of people strategy and training programmes
- Co-operative stakeholder relationships
- Innovative use of digital technology



Summary

Innovative and agile regulator optimising technology to improve efficiencies and decision-making. Employer of choice, valuing, engaging and developing staff.



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