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This report has been commissioned by Civitas Social Housing PLC ("Civitas") and has been prepared by The Good Economy Partnership Limited ("The Good Economy"), a specialist social advisory firm with expertise in impact measurement and management.

The Good Economy supported Civitas to develop its impact assessment methodology and carries out a review of the social performance of Civitas on a semi-annual basis. This report is based on analysis of quantitative data and evidence, as well as in-depth interviews with management and staff of Civitas Housing Advisors [the investment advisor to Civitas], partner Housing Associations, care providers and residents.

The findings and opinions conveyed in this report are based on information obtained from a variety of sources which The Good Economy believes to be reliable and accurate. However, the information reviewed should not be considered as exhaustive and The Good Economy, its principals and staff cannot and does not guarantee the accuracy, completeness and or fairness of the information and opinions contained herein. This report shall not be construed as a financial promotion or as a recommendation, invitation or inducement to any person to engage in investment activity.

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The information within this report is subject to change relative to new developments, facts and or research. The Good Economy therefore reserves the right (but is under no obligation) to alter the conclusions and recommendations presented in this report in light of further information that may become available.



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# **IMPACT REPORT – HEADLINE RESULTS**



IN 599 PROPERTIES





MANAGED BY 15 HOUSING . ASSOCIATIONS



38% OF PROPERTIES CONVERTED TO SOCIAL HOUSING FOR FIRST TIME

LOCATED ACROSS
160 LOCAL AUTHORITIES



67% OF PROPERTIES
IN THE 40%
MOST DEPRIVED
LOCAL AUTHORITIES



£3.50 IS CREATED
IN SOCIAL VALUE
FOR EVERY £1
OF ANNUALISED INVESTMENT

## **CIVITAS SOCIAL HOUSING PLC – IMPACT REPORT 2019**

# PROVIDING A HOME AND SUPPORT FOR UP TO 4,114 PEOPLE

With learning or physical disabilities and medium to high care needs







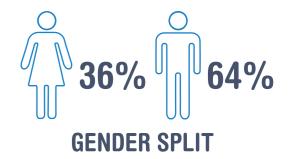




**AVERAGE AGE OF 33 YEARS** 



**FROM 114 CARE PROVIDERS** 



AVERAGE 25 YEAR LEASES PROVIDE SECURITY TO TENANTS



# **EXECUTIVE SUMMARY**

This report presents The Good Economy's (TGE) assessment of Civitas' investment activities and outputs during the six month period from March to September 2019. Our Annual Impact Report provides an analysis of the outcomes and wider impact supported by Civitas' investments.

Civitas' impact goal is to increase the provision of high-quality social housing that delivers positive social outcomes. In TGE's view, Civitas is currently delivering against that goal with a particular focus on Specialist Supported Housing (SSH) for vulnerable adults.

Over the last six months, we understand from Civitas management that they have concentrated their efforts on supporting Registered Providers (RPs) to strengthen their governance and financial management capacity. These actions are intended to mitigate the risks of lease-based models, as laid out by the Regulator of Social Housing (RSH) in their sector risk profile addendum report, published in April 2019. While these activities have been carried out, investment activity has slowed during the period to a 1.4% increase in the number of homes.

## Achievements

### Increase the supply of specialist housing

Over the last six months Civitas has added eight properties to their portfolio, providing SSH for a total of 42 vulnerable adults with a range of mental health needs and learning difficulties. Six of these new properties are located in the 40% most deprived local authorities in the country and seven of the eight new properties have been brought into the social housing sector for the first time.

### Improve the quality of specialist housing

We have been advised that asset management has been a particular area of focus for Civitas over the last year. This has included hiring a Director of Asset Management, who is currently undertaking a portfolio-wide review of necessary maintenance and improvement works. As part of this, the Fund has committed to £250,000 of renovations to further enhance and improve the quality of its homes for its tenants in addition to the RPs' full-maintenance leases. Civitas have also hired a specialist Healthcare Director to oversee relations with care providers and monitor the quality of care provision.

### Increase Tenant Well-being

TGE has visited properties and undertaken case studies with multiple housing and care managers and tenants, and in our opinion these homes are generally having a positive impact on tenants. This assessment is further supported by the findings of the Tenant Outcomes survey, which was completed for the first time from May to June 2019.

### **Delivering Social Value**

Employing the methodology of the Social Profit Calculator (SPC) for the June 2019 Impact report enabled us to calculate a monetary value of the Social Impact, Economic Benefits and Fiscal Savings generated by the Civitas portfolio. The SPC calculation indicates that the Fund produces a total social value of £114 million per year, including £59 million of direct savings to the taxpayer. £3.50 is created in social value for every £1 of annualised investment.

### Mitigating Impact Risks

TGE are of the opinion that Civitas have recognised the risks identified by the RSH and that the actions that they have advised us they are taking are reasonable and help mitigate these risks.

These actions cover two areas:

- Updating the lease agreements to give partner RPs more financial security.
- Capacity building within RPs. This process includes the setting up of a Community Interest Company (CIC) to act as a support body for RPs, supporting them to strengthen their governance and financial management capacity and sharing best practice.

## Conclusions

TGE positively views the actions that Civitas has taken to support its partner RPs. Progress in this area will be monitored by TGE, particularly as the CIC, created to support these efforts, becomes more established.

It is TGE's opinion that the slowing down of investment is a positive move for the Fund. Supporting the long-term sustainability of the Fund is a necessary condition for achieving a positive impact. We have also been informed that Civitas are taking steps to ensure and improve the quality of properties and care, most notably through the hiring of a Director of Asset Management, a Healthcare Director and a Director of Partner Engagement. These roles are still relatively new and so an update on their respective impact on the quality of both assets and care will be provided in the June 2020 report.

TGE highlights three areas which we regard as positive strengths of Civitas and we also provide an update on two areas where there is room for improvement along with associated mitigants.

### Strengths

- Positive outcomes for vulnerable adults, particularly those moving from long-term institutional care to more independent settings in SSH.
- Targeted actions to improve the quality of governance and financial management of Civitas' partner RPs, and a commitment to improving standards throughout the SSH sector.
- Demonstrated improvements in the standard of asset management across the portfolio, through the appointment of new directors focused on engagement.

### Potential Weaknesses and Mitigating Action

- The specialist RPs in the SSH sector can have limited institutional capacity and financial strength.
- We remain reassured that the Fund is attempting to support its partner RPs to build their organisational capacity. The
  appointment of board members to RPs across the sector, and the establishment of a CIC to offer governance and financial
  management advice to RPs, provide two examples of actions Civitas is undertaking in this area to support both its partner
  RPs and the wider sector.
- Civitas have now implemented their new Force Majeure clause, and their rent 'collar and cap'. These have been implemented within contracts as part of recent transactions, following consultation with RPs.
- Civitas has no direct relationship with its ultimate beneficiaries the often vulnerable adults that live in Civitas-owned properties.
- TGE welcomes Civitas' openness to carrying out a Tenant Outcomes Survey. Whilst a similar survey was not conducted for this
  report, TGE plan to repeat this exercise for the next full-year Impact Report and scale it up to reach a larger sample of tenants
  in the coming years.

# 1 / INTRODUCTION

## **About Civitas**

Civitas Social Housing PLC is the UK's first social housing Real Estate Investment Trust [REIT] launched on the London Stock Exchange in November 2016.

It raises capital at large-scale from institutional and retail investors and uses the funds raised to buy properties to be rented as social housing for the long-term. Civitas' social objective is to help tackle the chronic shortage of social housing in the UK, with a current focus on supported housing for vulnerable adults. As of 30 September 2019, Civitas has invested £764 million in 599 properties across the UK.

## Market and Policy Context

'Specialist Supported Housing (SSH) is an essential community service that prioritises the wellbeing of residents through providing accommodation for people with a range of learning or physical disabilities. The majority of people living in a SSH property have 24/7 care on-site and available, whilst offering a better experience of independent living than residential accommodation.

Following the Winterbourne View scandal, there is increasing acknowledgement among policymakers of the potential dangers for vulnerable individuals of remaining in institutional care long-term, and a growing recognition of the benefits of community-based social housing. As a result, the Care Act 2014 and the government's 'Transforming Care Agenda' have sought to prioritise the 'suitability of accommodation' in meeting the home care and support needs of vulnerable people, encouraging this shift towards supported living settings.

	Long-stay Rehabilitation Service		Care Home	Supported Living	Community	
	Long-stay NHS Hospital	Rehabilitation Service	Care Home	Supported Living	Community	
Providers	NHS / Independent	NHS / Independent	Local Authority / Independent	Specialist Supported Housing and Care Providers	Care Providers	
Funding	NHS	NHS / LA	NHS / LA	LA	LA	
Service Users/Offer	Hospital-based care and support	Care and support to facilitate transition from hospital to residential	Residential care and support	Home-based care and support	Community based care and support	

- Whilst supported living is typically the preferred model of care, local authorities are facing a chronic shortage of housing stock that is both affordable and suitable to meet the needs of adults with specialist care needs.
- The development of SSH, such as that provided by Civitas Social Housing, is helping to meet this high and rising demand for specialist social housing.

In addition to the view that supported living settings benefit the wellbeing of residents, there is also strong independent evidence that SSH is a cost-effective way of providing housing to those with complex needs. A report by Mencap, a leading UK charity for people with learning disabilities, indicates that a person living in SSH requires, on average, state funding of £1,569 per week for

housing and care. This compares favourably with the costs of alternative living arrangements for those with complex care needs, with the weekly cost to the public purse of SSH £191 lower when compared to a residential care placement, and £1,931 lower when compared to an inpatient place.<sup>1</sup>

It should be noted that most, if not all, of the people living in SSH are eligible for and claim Housing Benefit to cover the cost of their accommodation. Following two consultation exercises in August 2018 it was agreed by the government that this funding mechanism would continue, rather than being devolved to a Local Authority controlled budget. This move was widely welcomed and taken as further indication of the government's acknowledgement of the importance of funding SSH for vulnerable people.

## Social Need

Given such evidence, it is unsurprising that demand for the type of SSH that Civitas funds is rising. The same Mencap report projects that demand for SSH will increase from a baseline of 22,000–30,000 SSH units (typically occupied by multiple people) in 2017/18 in England to 25,500–33,500 units by 2021/22 and to 29,000–37,000 units by 2027/28. This is largely driven by:

- The population of people with learning disabilities is growing due to higher survival rates at birth and increasing life expectancy.
- Government policy, particularly the Transforming Care Agenda, which promotes moving people out of institutional settings to community-based housing alternatives that promote independent living.
- Decline in informal support networks and at-home care, with more working mothers and increases in single-parent families.

With this increasing demand, there is a clear social need to increase the supply of SSH.

The combination of better outcomes for individuals and the potential cost-savings to public care budgets mean the social value proposition for SSH is widely recognised to be high.

## Funding Social Housing

The funding market for social housing is changing rapidly. With declines in government funding, and specialist housing not eligible for government grants, RPs are increasingly having to explore alternative forms of private finance (beyond bank debt) to finance new developments.

Civitas and other housing funds are bringing in new funding models to social housing, backed by institutional investors. These funds provide long-term equity to the social housing sector. The funds use the capital raised from investors to buy properties and leases them to RPs to manage, with rental income used to fund investor returns.

The launch of these new funds has had a mixed reception within the social housing sector.

In early 2019, the Regulator of Social Housing (RSH) published an addendum report to its annual "Sector Risk Report", regarding "Lease-based providers of specialised supported housing" where it specified its concerns about the governance and financial viability of RPs whose business model is predicated on taking long-term leases from property funds. This was followed up by the Regulator in its 2019 Sector Risk Profile where it said:

"The risks identified [in the SSH Addendum] continue to be a significant concern." 2

Mencap and housing Learning and Improvement Network [LIN] 'Funding supported housing for all: Specialised Supported Housing for people with a learning disability', April 2018.

<sup>2.</sup> Regulator of Social Housing [RSH], Sector Risk Profile 2019, October 2019

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The concerns centre around the quality of governance and the financial capacity of small RPs to manage downside risks. Another risk that was identified for the whole sector, is the lack of knowledge on, and upkeep of, existing stock. The RSH raised a concern that, where returns were demanded by an investor, this may come at the expense of long-term investment and other services.

TGE's perspective is that the inflow of institutional investment capital into social and affordable housing has the potential to help fill the funding gap and have a positive impact, but these new funding models also bring risks. Hence, the importance of ensuring private capital providers take a long-term and socially responsible approach. This requires having an explicit focus on delivering social impact, and ensuring financial costs and funding structures do not threaten the viability of registered housing providers' investments in maintaining the quality of the homes or occupants' enjoyment of their homes.

## This Report

This is a half-year Impact Report for Civitas produced by The Good Economy (TGE). TGE carries out an assessment of Civitas' performance against its social objectives and Key Performance Indicators (KPIs) on a semi-annual basis. TGE uses a mix of quantitative and qualitative data [including stakeholder and tenant feedback] to evidence social impact performance.

Having reviewed the RSH's annual Sector Risk Profile, for this report, TGE had a particular focus on what concrete actions Civitas is taking to mitigate these risks, both in terms of supporting the long-term viability and service quality of partner RPs and ensuring their stock remains 'fit for purpose'.

# 2 / IMPACT ASSESSMENT METHODOLOGY

Civitas' impact goal is to increase the provision of high-quality social housing that delivers positive social outcomes.

Specifically its social objectives are:



### **AVAILABILITY**

To increase the availability of social housing across England and Wales, particularly for vulnerable people



QUALITY

To improve the quality of social housing



### VALUE FOR MONEY

To offer value for money for the public purse

These objectives form the core of the Civitas Impact Thesis:

Increase the supply of specialist housing (Availability)

Improve the quality of specialist housing

<u>3</u>A

High quality specialist housing increases tenant well-being outcomes 3B High quality specialist housing is good value for money (Value for

Money)

Throughout this process Civitas mitigates against impact risks

Civitas works with its Housing Associations to collect output data on a regular basis. This output data is complemented by analysis, regular interviews and tenant surveys conducted by The Good Economy focused on evidencing outcomes for the tenants. The results of this data are provided in this report, with the above objectives informing the structure of the Analysis and Results Section (Chapter 3).

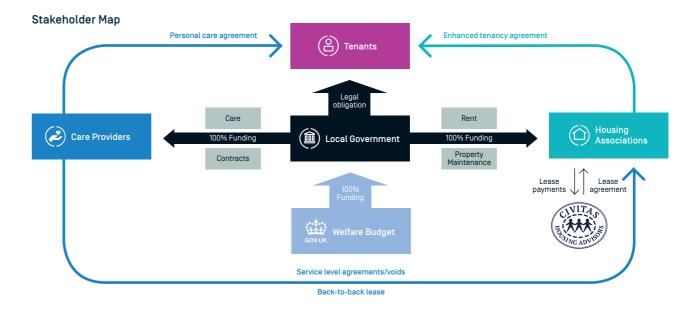
Civitas currently focuses on specialist housing which falls into five categories:

- Specialist Supported Housing (SSH) for people living with learning difficulties, autism and acquired brain injury
- Mental health care facilities where people require monitoring and supervision in carrying out daily tasks
- Accommodation for people able to step-down from the NHS and transition to more independent living
- Accommodation for people with addictions
- Accommodation for people who are homeless or at risk of homelessness

Civitas' tenants include people with learning and physical disabilities, people with mental health problems, those suffering from drug and alcohol addiction and individuals at risk of homelessness. Civitas works with Registered Providers, Care Providers and local authority commissioners who are committed to providing high quality SSH.

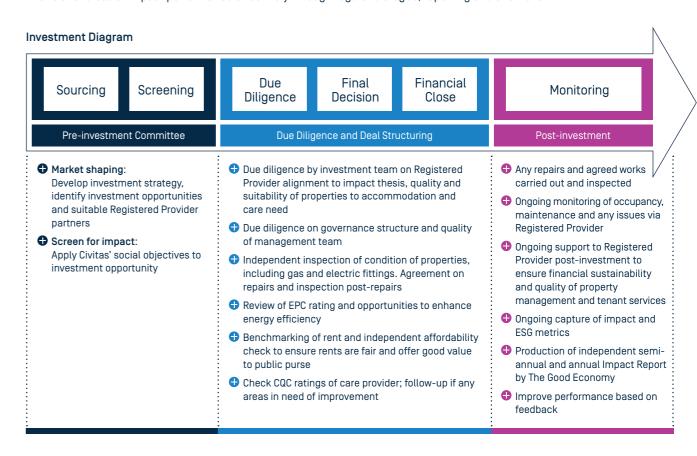
### **Stakeholders**

Civitas works with a range of stakeholders to provide specialist housing for their tenants. The Stakeholder Map (diagram below) represents Civitas' key stakeholders beyond its shareholders.



### **Investment Process**

Civitas aims to consider social impact during all stages of the investment process. The Investment Diagram [below] shows this shows how impact considerations are integrated throughout the process. As Civitas' independent impact advisor, TGE reviews output data and conducts interviews with RP managers and senior Civitas Housing Advisors [CHA] staff in order to better understand Civitas' impact management process. Based on this information, TGE believes that Civitas is monitoring its partners' financial and social impact performance effectively through regular dialogue, reporting and site visits.









## Measuring Outcomes and Impact

To better understand the impact that Civitas is having, TGE, working in partnership with the Social Profit Calculator (SPC), carried out a Tenant Outcomes survey from May to June 2019. The data collected helps provide an understanding of the benefits that SSH is having for Civitas' tenants.

As well as using the data to understand the drivers of impact, SPC used this data to calculate the monetary value of the impact.

This is divided into:

### Social Impact

Improved well-being, mental health, physical health, reduced social isolation, increased confidence and self-esteem, employability skills, aspirations etc.

### Fiscal Savings

Reduced costs associated with welfare benefits, crime, education social services, health and mental health services etc.

### Economic Benefits

Increased tax, national insurance, and earnings due to reducing worklessness and sickness days.

Social Profit Calculator was founded in response to the Social Value Act 2012 which has made it a legal requirement for Public Sector organisations to account for the social, economic and environmental impact and value during the planning, procurement and delivery of projects and services. Social Profit Calculator specialise in calculating the value of social, economic and environmental impact, and demonstrating the financial return on investment. They are the only UK software platform accredited by Social Value UK and Social Value International to help businesses measure the social value they create.

SPC produce calculations using analysis types that are approved by HM Treasury, Cabinet Office and the Office for National Statistics. The information used for calculating Civitas' social value consisted of portfolio information provided by the advisor, approved social value data from SPC's database and data collected directly from residents living in Civitas properties, through the development of an impact measurement app.





## 3 / SOCIAL IMPACT ANALYSIS AND RESULTS

During the period March to September 2019, Civitas has focused its efforts primarily on consolidating its portfolio of specialist housing, with eight new properties added. It is also utilising its expertise and influence within the sector to support partner RPs to build their organisational capacity and mitigate the impact risk of potential non-performance.

## 3.1 Increase the supply of specialist housing

Over the last 6 months Civitas has gradually increased the supply of SSH in the sector, whilst working to ensure the long-term success of its partners. During the period March to September 2019, eight new properties have been added, seven of which have been brought into the social housing sector for the first time, with these properties providing housing for 42 individuals. This brings the total number of Civitas properties to 599, with accommodation provided for 4,114 individuals. Civitas properties continue to serve individuals living in the more deprived areas of the UK, with 75% of the new properties, and 67% of the overall portfolio, located in the 40% most deprived local authorities in the country.

The portfolio contains examples of newly-built schemes, as well as buildings which have been repurposed to be used for SSH for the first time. These types of schemes have a "High" level of additionality on the TGE Additionality Scale.3 As well as the obvious additionality of funding new-build properties and conversions to SSH, Civitas' involvement in the sector can also generate high levels of additionality even when acquiring existing stock. Through entering into strategic partnerships with care providers, Civitas can acquire entire portfolios. Not only does this ensure that properties remain in the social housing sector for the long-term, Civitas' involvement also frees up capital to be recycled by care providers, thus allowing them to expand the stock of specialist housing elsewhere. Civitas therefore contributes to increasing the supply of specialist housing both directly and indirectly.

Figure 1 shows a detailed breakdown of the Fund's core performance metrics [see page 14].

3. The TGE Additionality Scale is a standardised approach to evaluating the contribution of a housing fund.







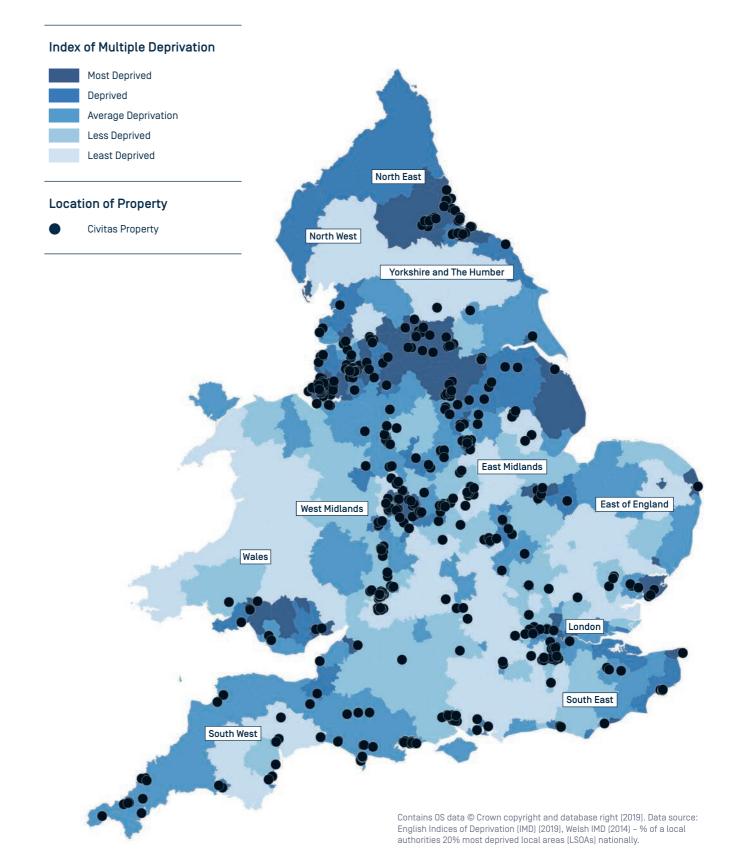
Figure 1 - Key Performance Indicators for Civitas

IMPACT MANAGEMENT	INDICATOR	Results as of				
PROJECT	MBIGATOR	Mar 2019	Sept 2019	% Change		
	PROPERTY METRICS					
	Value of capital deployed	£755m	£764m	1%		
How much	Number of properties	591	599	1%		
HOW ITIGET!	Number of Local Authorities	157	160	2%		
	Number of Registered Providers	15	15	0%		
	Number of Care Providers	113	114	1%		
Contribution	Number of properties converted to social housing sector for the first time	223	230	3%		
Contribution	% of properties converted to social housing sector for the first time	38%	38%	0%		
	TENANCY METRICS					
	Number of tenancies	4,072	4,114	1%		
	Breakdown of residents by classification of care**					
	Multi diagnosis	45%	44%			
	Learning difficulties	32%	32%			
	Mental health	11%	11%			
Who	Dependencies (e.g.drug addiction)	5%	5%			
	Autism	6%	6%			
	Other: including homelessness	1%	1%			
	Average age*	32	33			
	Gender breakdown*					
	Male	64%	64%			
	Female	36%	36%			

<sup>\*</sup>Gender breakdown from 2019 resident survey.

# Location of Properties

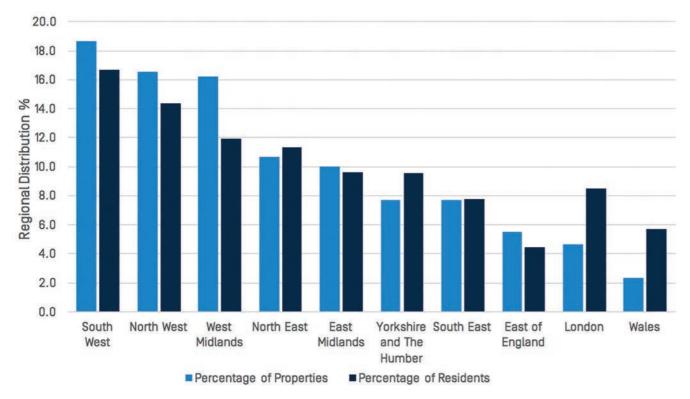
The homes that are in the Civitas Portfolio are lived in by people in some of the most deprived areas in the UK. Located across 160 local authorities, 67% of properties are in the 40% most deprived local authorities in the country.



<sup>\*\*</sup>Note that figures for March 2019 have been re-stated due to a change in definition of classification of care need.

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Figure 2 - Regional Distribution of Civitas Properties



## 3.2 Improve the quality of specialist housing

A core element of Civitas' social objective is to improve the quality of specialist housing for vulnerable individuals with a care need. For this objective to be realised, a strong partnership is required between Civitas and its partner RPs and CPs. The RP is responsible for rent collection, maintenance, health and safety and safeguarding of tenants, whilst the CP is responsible for provision of care and support.

Civitas, as the property owner, technically has no legal responsibility for the wellbeing of tenants. However, Civitas' stated impact goal is to deliver positive social outcomes for its tenants and it is TGE's opinion that Civitas takes proactive steps to achieve this goal through engaging with RPs, CPs and tenants to monitor and improve the quality of housing maintenance and care provision. Details of the steps taken are set out below:

### Ensuring high quality property maintenance.

We have been informed that Civitas receives regular feedback from CPs on the quality of the building management services provided by the RP. Quarterly monitoring visits are carried out to properties managed by all RPs, whilst TGE also visit a handful of properties on a bi-annual basis to speak with residents and care managers, receiving feedback on the quality of the RP at maintaining the property as well as feedback on the quality of care.

#### Ensuring the quality of the buildings.

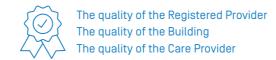
When purchasing a property, Civitas works with the valuer JLL to identify works that are needed to ensure the property remains at a high standard for the duration of the lease [normally 25 years]. Carrying out such improvement works has the potential to cause some short-term inconvenience for tenants, but should contribute to improving their quality of life in the longer-term. Civitas have also recently hired an experienced Director of Asset Management and they are currently

undergoing a systematic portfolio-wide review, identifying necessary improvement works. TGE have been informed that this review process has led to Civitas committing approximately £250,000 to improvement works, despite having no legal obligation to do so. This demonstrates a desire to preserve the value and quality of their assets for the long-term, as well as a willingness to ease the financial burden on RPs when necessary.

#### Ensuring the quality of care.

Civitas' Due Diligence process involves a comprehensive review of all care providers [CPs], prior to deals going ahead. CPs working in the specialist supported sector are regularly monitored and rated by the Care Quality Commission (CQC). In the June 2019 report we stated that, where data was available, three CPs that Civitas work with had been rated as 'Requires Improvement'. In the last six months, there has been positive progress with these providers, as two have been re-inspected and have now received an overall rating of 'Good'. For one of these providers, there was a change in management following on from Civitas' acquisition and this has been reflected on the CQC website. The third provider has not yet been re-inspected and so is still rated as 'Requires Improvement'. Civitas will be reaching out to this CP to get an update in the coming months.

A core element of Civitas' social objective is to improve the quality of specialist housing for vulnerable individuals with a care need.



## 3.3a High quality specialist housing increases tenant well-being outcomes

For the June 2019 Impact Report, TGE worked with the Social Profit Calculator to collect outcomes data from a representative sample of tenants across the whole portfolio. This process involved collecting responses from professional support workers, family members and tenants themselves. Outcomes data was collected for 148 tenants, living in housing across 60% of partner RPs, and receiving support from 15% of CPs.

The key findings were:

- 53% of professional support workers reported that their resident's mental health has improved since moving into the accommodation.
- However, many professional workers reported no change for the resident's physical health since moving into the accommodation. This neutral response was more frequent in environments where the level of care is more intense, and residents are not expected to make as much progress.
- 90% of family members stated that the resident's motivation and aspirations have increased since moving into the accommodation.

TGE also conducted various site visits prior to publishing this report, and from our visits over the last six months, we have seen several examples of the positive benefits that SSH can have for residents. See case study stories of Lisa on page 25, and Elsa on page 23.







## 3.3b High quality specialist housing is good value for money

TGE has reviewed the value for money of the Civitas SSH portfolio, in partnership with the Social Profit Calculator, considering the value for the taxpayer and the financial value of the impact that Civitas homes are having on their tenants.

The findings showed that across the entire portfolio, as of March 2019, the fund generates £114 million of social value per year. This equates to £3.50 created in social value for every £1 of annualised investment.

This was divided into:

- £40.2 million of Social Impact the value of the improved outcomes for tenants.
- \rm £9.3 million of Economic Benefits the increased economic activity that has been generated.
- 4 £64.7 million of Fiscal Savings the savings to local and national government by services that are no longer needed.

It is expected that TGE will work with SPC on an ongoing basis, with a Tenant Outcomes Survey conducted and social value figures calculated on an annual basis for the full-year Impact Report. Updated figures will be available in the next full-year Impact Report to be published in June 2020.

The findings showed that across the entire portfolio, as of March 2019, the fund generates £114 million of social value per year. This equates to £3.50 created in social value for every £1 of annualised investment.

## 3.4 Mitigating impact risks

In January 2019 the Regulator of Social Housing (RSH) raised a number of serious concerns regarding lease-based providers of Specialist Supported Housing.

Specifically five key concerns were highlighted:

- The concentration risk that comes from having long-term, low-margin inflation linked leases as a single source of finance
- The thin capitalisation of some of the RPs undertaking this model
- Poor risk management and contingency planning undertaken by some of the RPs
- Some inappropriate governance practises that have led to poor decision making
- 4 A lack of assurance about whether appropriate rents are being charged.

Overall, the review questioned the quality of service delivery, governance and sustainability of business models in some of these specialist RPs.

Five of Civitas' RPs have received Regulatory Judgements or Notices. TGE believe that Civitas have recognised the risks identified by the RSH, and have instigated activities intended to support RPs in mitigating the risks raised by the RSH:

- Updating the lease agreements
- Capacity building within RPs.

## Updating the leases

The biggest risk to an RP (and therefore their tenants) is the inability to cover their lease payments due to an operational or legislative 'shock' to their model.

As a response to increased regulator scrutiny on the lease-based SSH model, Civitas have made two changes to their leases to support their RPs and mitigate this risk, and may make others in the future:

- Adding a Force Majeure clause, that ensures if a significant event occurs that impacts an RPs' ability to meet its lease obligation, the RP and Civitas will meet and create a contingency plan to best support all stakeholders. This clause has been implemented on the Fund's recent transactions and Civitas are currently in the process of negotiating the specifics of the clause with all 15 RPs with whom they work.
- Adding a cap of 4% on rent increase, regardless of the rate of inflation. This clause has now also been implemented on Civitas' most recent transactions and will continue as standard on all future deals.

TGE considers these changes to be a positive step in mitigating the risk of 'shocks'.







## Capacity building within RPs

The Regulator has recently raised concerns about poor risk management and inappropriate governance practices with SSH RPs. These are both significant Impact Risks.

We have been advised that Civitas is working with its RPs to tackle both of these issues in a number of ways:

- Helping RPs to recruit experienced board members. Civitas have supported the appointment of 30 new board members to the boards of RPs with whom they work. Civitas anticipate that this process is helping RPs to improve their expertise and technical capabilities around meeting regulatory standards, financial management and risk appraisal.
- Creating a new Community Interest Company [CIC] to act as a support body for Registered Providers of SSH, intended to provide management and financial viability advice, and facilitate sharing best practice. The CIC currently has one member Auckland Housing Association with, we are told, more scheduled to join in the coming months. Civitas have advised us that another aim of the CIC is to bring relevant partners together to improve the formalisation of the SSH sector. As a nascent sector, industry-wide standards are relatively under-developed. We understand that Civitas are aiming to use the CIC to support the development of good practice standards within the SSH sector. Another key aim of the CIC is to bring relevant partners together to improve the formalisation of the SSH sector. As a relatively nascent sector, industry-wide standards are relatively under-developed and so Civitas are aiming to use the CIC to support the development of such standards.
- Seminars are held once a quarter with all of Civitas' partner RPs and this provides an opportunity for RPs to sit down and share resources at a higher level.
- Working with their RPs to develop a 30-year stress testing model that is suitable for the lease-based model.

## Appropriate rent setting

Civitas carries out a rent review for each property. Civitas informed TGE that it commissions Support Solutions to carry out a review of all rents and check that they are fair value and supported by the Local Authority. All rents are benchmarked. In some cases, Civitas informed us that it has been able to reduce the rent from what was previously being paid.

# 4 / CASE STUDIES

# PROPERTY CASE STUDY – PRINSTED Investment date PATHWAY FOR CARE **April 2017** Total potential number of residents Location: Horley

### **About Prinsted**

Prinsted comprises a set of 9 repurposed, specialist supported living flats in Surrey. Previously an addiction centre, the property was converted into supported living accommodation in 2015, with Civitas acquiring the property upon completion of the renovation. Hilldale Housing Association are the RP and are responsible for maintenance and repairs. Pathway for Care are the care provider. They specialise in providing supported living for young people with autism, focusing on getting people with autism into more independent settings earlier in their life so that they can develop as any other young person would.

With 24/7 care on-site, the scheme delivers much needed SSH for people with high acuity care needs, whilst providing them with the independence of living in their own flat. Prinsted was originally suitable for eight tenants but owing to the level of demand for this form of accommodation, another flat was developed as a part of a refurbishment. Residents at the property are all in their 20s, and come from a mix of previous living situations including children's services, residential care and some from secure clinical placements. All bedrooms have an en-suite bathroom with kitchenettes. There is a also a shared open plan living area and communal kitchen, as well as a garden and an external outbuilding which is used by staff as a day office. The scheme has a very homely feel and there appears to be a great relationship between care workers and tenants. A good example of the level of tenant engagement is in the fact that residents are included in the interview process for new care workers.

### **About Hilldale Housing Association**

Hilldale are a Housing Association with over 500 units of social housing, the majority of which are in the North West of England. As an organisation, Hilldale are relatively unique in that they specialise in managing supported housing for people who need additional support owing to learning disabilities, autism or other complex mental health needs. Their entire social housing stock therefore caters for people who require help to live independently in their own home.

We're all from practice backgrounds and we are all absolutely passionate about the quality of care we want to deliver to tenants.

Ian Hutchinson, Managing Director, Pathway for Care



## **RESIDENT STORY - ELSA**

Elsa was the second resident to move into Prinsted in May 2018. She has autism and when she moved into one of the supported living flats at the property, it was her first time living independently. She settled into her new flat quickly and is now used to having the independence of her own space.

Elsa has a very active life at Prinsted. She has been able to pursue many hobbies during her time there. She regularly knits upcycled clothing into garments and baby-grows, many of which have been donated as presents to members of staff. Elsa is also part of a swimming club, and with the help of care workers, she was recently able to achieve a personal life-goal of going skydiving, with more similar activities planned for the future.





## PROPERTY CASE STUDY - ST THOMAS HOUSE



Investment date
March 2018



Total potential number of residents

13



### **About St Thomas House**

St Thomas House is a SSH scheme that provides supported living to 13 residents in Chester. The building was previously used as a benefits office, but was redeveloped into an SSH scheme, comprising 13 self-contained apartments and communal living areas three years after the benefits office had closed down. Civitas acquired the property in March 2018, with Hilldale acting as the Housing Association, providing housing management and maintenance services for the homes. With the majority of tenants in their 20s and early 30s, this scheme provides housing for a relatively young demographic, most of whom have come from family homes or acute needs hospitals.

### About 1st Enable

1st Enable was founded in 2012 by a group of experienced care professionals. Their shared goal was to offer a service that would allow people with learning disabilities to have the same rights, and experience the same opportunities, as everyone else. Since its inception, 1st Enable have grown to a point where today they provide care for approximately 100 residents in a range of settings, who are supported by a growing team of roughly 300 staff. They are a CQC-regulated provider, receiving a rating of Good and Outstanding in all areas for their last inspection.

1st Enable act as the Care Provider for two schemes that Civitas owns, providing supported living for adults and young people with autism, learning disabilities and mental health conditions.

# As a Care Provider, 1st Enable implement certain processes and offer numerous services that go above and beyond most providers.

- Internal Quality Assessment beyond the standard CQC rating, 1st Enable hire a semi-independent company to assess the quality of their service. Results from this assessment are utilised to inform and steer internal learning and should be upheld as an example of best practice.
- Outreach 1st Enable run outreach support services that allow individuals to be supported within the comfort of their own home. This ensures that people are able to receive the support they need whilst allowing them to build their own independence.
- Respite 1st Enable offer an innovative service called 'Living Escapes'. This is a short-term (nightly accommodations) supported living arrangement that can be used by individuals to see whether supported living is the right option for them. These 'Living Escapes' flats can be utilised as a step towards a more independent setting, with their temporary nature making decisions less daunting for families and individuals.
- ♣ Life Skills Development 1st Enable work with both colleges and employers, including their own not-for-profit enterprise called Showcase, which include cafés, catering and crafts, to provide living and working skills to tenants. This Life Skills Development aims to ensure that the people they support are able to become as independent as possible. It also aims to make demonstrable savings to the commissioners they work with as well as improving the confidence and the lives of those that they support.

.....

## **RESIDENT STORY - LISA**

Lisa moved into St Thomas House in 2018, having spent the majority of her life in secure, institutionalised facilities. She began receiving support from 1st Enable roughly four years ago, who in that time have worked with her to improve her confidence and her ability to live a more independent life.

Prior to coming to St Thomas House, Lisa moved from a secure facility into Cotton Hall Farm, a 1st Enable, shared supported living facility that offers some flexibility but within an appropriate environment. It was envisioned by some professionals that Lisa may struggle at Cotton Hall Farm. However, whilst there were some initial challenges, through the Positive Behavioural Support embedded within 1st Enable's culture, she made excellent progress overall and developed a desire for a more independent life.

From here, Lisa took another step away from the institutionalised settings in which she had grown up. She moved into her own supported living flat within St Thomas House. This has a much bigger social setting and is closer to local amenities.

Lisa's transition through these care settings have hugely improved her quality of life. She now enjoys a level of independence that would not have seemed possible a few years ago. She even acts as an active ambassador championing the type of home in which she now lives, in the hope that others can benefit from a similar pathway.

On top of the improved quality of life that a move to SSH has provided for Lisa, this transition has also provided significant government cost savings. Lisa's time in secure institutional care was likely to have cost up to £8,000-£10,000 per week. The costs of being in supported living at St Thomas House are a fraction of that figure, at roughly £1,500 per week.







# 5 / SOCIAL PARTNERS

## **CRISIS: TOGETHER WE WILL END HOMELESSNESS**



Crisis is a national charity for the homeless that works to provide vital support so that people can rebuild their lives and are supported out of homelessness for good. As an organisation, they have over 50 years' experience working with the homeless and campaigning for permanent change.

## Civitas supporting 'Renting Ready'

Civitas have now been supporting Crisis for over three years with the funding they provide continuing to pay for the employment of one Housing Trainer for Crisis' 'Renting Ready' training course.

People on low incomes and with previous experience of homelessness face significant barriers when trying to access accommodation. This course helps vulnerable people to develop their understanding of essential independent living skills, providing them with the skills to manage and maintain their tenancies so that they may find and keep a future home. The trainers support learners to approach landlords where needed, and help them to understand their own rights and responsibilities and how to get the most out of their future move. The course is delivered across the 11 Crisis Skylight centres around the UK.

It made me realise that I could afford private rental accommodation.

Renting Ready Learner, Porchlight

### **Results and Impact**

As of June 2019, the following results and outcomes have been achieved:



11 COURSES delivered



**100%** of learners reported that they found Renting Ready useful



## 71 LEARNERS

received and completed
Renting Ready



**100%** of learners reported increased confidence in managing a tenancy because of Renting Ready



13 STAFF trained



**100%** of learners improved their tenancy related knowledge as a result of Renting Ready







The willingness of Civitas to spend serious time and effort to explore new housing models continues to impress. The value of this type of strategic engagement cannot be underestimated.

Jon Sparkes, CEO, Crisis

## THE CHOIR WITH NO NAME: CHOIRS FOR PEOPLE AFFECTED BY HOMELESSNESS



The Choir with No Name is an organisation that runs choirs for people who have experienced homelessness and other forms of marginalisation. Founded on the premise that singing makes you feel good; The Choir with No Name aims to be a positive force in the life of vulnerable individuals.

## About The Choir with No Name

People who are homeless or otherwise on the margins of society are often struggling with loneliness or isolation. The choir enables these people to make friends, build their confidence and skills and find their place in society, especially where traditional support networks from family or friends may have broken down. Each of the four choirs across the UK, gets together to rehearse every week and perform regularly at a variety of different venues.

Civitas are keen to continue to support the growth plans of The Choir with No Name, who supported a total of 1,085 individuals in 2018/19 against a target of 720. This secure source of funding is important as it both enables the organisation to fund concerts whilst also allowing the four choirs to continue providing their valuable services to individuals in need.

The Choir with No Name performed 51 gigs across the UK during 2018/19 to a total audience of more than 14,000. They also recorded their first single, 'This is Me', with the song and video officially released in October 2019 to coincide with World Homelessness Day. The release of the single has been accompanied by a public campaign focused on destigmatising homelessness and highlighting individual stories from Choir members.

### Results and Impact

As of June 2019, the following results and outcomes have been achieved:

### **MEMBER SURVEY RESULTS 2019**



**84%** of members have learnt at least one new skill apart from singing



**82%** of members felt the choir helped them achieve at least one positive change in their lives including securing accommodation or finding a job



**90%** of members reported increased in confidence



**94%** of members have made new friends at choir



**81%** of members reported improved mental health

Looking forward, the Choir is developing a new community choir model to allow individuals and organisations in remote parts of the country to set up a choir for homeless and marginalised people. This model will allow the choir to expand its scope of impact, reaching more vulnerable and isolated individuals and bringing the benefits of the Choir to people who were previously excluded.





The choir has given me hope. It's a reason to live, a reason to continue. When I was in my deepest depression, the choir was the only thing that kept my mind going. It is a lifeline.

Choir Member



## THE HOUSE OF ST. BARNABAS: MEMBERS' CLUB AIMING TO BREAK THE CYCLE OF HOMELESSNESS

## The House of St Barnabas LONDON

The House of St. Barnabas is a social enterprise member's club that helps London's homeless people back into work, through their Employment Academy. Their approach is driven by their mission; to create the strongest community of people who are invested in creating a fair and equal society, and a future where lasting work is a reality for people affected by homelessness.

### About The House of St. Barnabas

The club is in the middle of Soho and has a connected community of people from diverse experiences and expertise, who have come together around a shared ideal of creating a fairer, better society.



It was thanks to the people here that I found my job.

**Employment Academy Graduate** 

Civitas is helping to fund the Employment Academy, a programme which supports those affected by homelessness back into lasting, paid work. The Academy offers a tailored three-month Employment Preparation Programme, providing work experience within The House of St. Barnabas' vibrant business, alongside accredited qualifications from City & Guilds, as well as real job opportunities and mentoring. Further support is offered within the Employment Academy beyond the Employment Preparation Programme to help graduates find, keep, and progress in, work.

Civitas have also sponsored the production of the House of St. Barnabas' first Employment Academy impact report, which provides information on the social impact of the programme's first five years of operation. Overall, since the first programme participants graduated in February 2014, the Academy has supported 104 people into 133 jobs in the last five years.

# Results and Impact



**190** total graduates



63% of graduates get paid work within one year



19% of graduates who have found work are now benefiting from a secure tenancy



80% of graduates gained a

City & Guilds award during the programme 

## **WOMEN IN SOCIAL HOUSING (WISH)**



WISH is a membership-based network for women working across every discipline of UK housing. Each Region of WISH meets at least four times a year, allowing members to share ideas and information and widen their network.

## About Women in Social Housing (WISH)

With talks from inspiring speakers and more relaxed evenings of networking, women in social housing are able to keep up to date with industry news, improve self-confidence and share knowledge and good practice with like-minded individuals.

WISH brings together women at all stages of their careers and across the whole range of organisations who operate in the sector - both private and public. This has enabled WISH to become a thought-leader in the sector highlighting the issues of diversity, gender inequality and what the sector can do better to retain women and address the gender pay gap.

Civitas is promoting the work of WISH to increase inclusivity and gender balance across social housing sector at every level.



## **Results and Impact**



We couldn't do the work we do without the support from organisations like Civitas, helping us to operate and support women across the housing sector

Nicola Dibb, Co-founder and Executive Director of Women in Social Housing (WISH)

# 6 / WIDER IMPACT INVESTMENT ROLE

Civitas are now using their scale to encourage wider growth in Impact Investing.

## The Big Exchange

Civitas have been invited to be a founding member of The Big Exchange [TBE], a new ethical investment platform promoted by The Big Issue Group, which aims to make it easy for individual investors to invest in funds that aim to have a positive impact on people and the planet. By creating TBE, the Big Issue and its partners are promoting and advancing an inclusive financial system in the UK, delivering a positive social and environmental impact.



Using a mobile application, TBE will exclusively host selected positive impact funds on the platform, such as Civitas, allowing users to easily invest in line with their ethical preferences. TBE will only allow partners to offer their products on TBE if they pass certain criteria. Investments on TBE will show users the level of impact

each investment fund is having via a rating of Gold, Silver and Bronze and will align funds investment objectives with the UN's Sustainable Development Goals. The platform is now in the final stages of development and is due to launch in December 2019. Civitas will sit as part of the governance committees to help guide its delivery and impact, and are due to join the platform early in the new year.



66 After the financial crisis, people have seen how the mainstream financial system failed us and now they want a return for people and planet as well as a financial return.

Nigel Kershaw, Chair of The Big Exchange and Big Issue Group

### Founding partners include:



















Tortoise

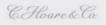


















# 7 / CONCLUSION, NEXT STEPS AND RECOMMENDATIONS

Over the last six months, Civitas have grown their portfolio by eight additional properties. The Fund has focused on supporting the capacity-building of its partner RPs and improving the wider SSH sector and improving the standards of asset management across its portfolio.

In our conclusions we have chosen to highlight three areas which TGE regards as strengths of Civitas and to provide an update on two areas where there is room for improvement along with associated mitigants.

## Strengths

- 1 Positive outcomes for vulnerable adults, particularly those moving from long-term institutional care to more independent settings in SSH.
  - \_ The results of the Tenant Outcomes Survey 2019 demonstrates that supported living settings generally lead to an improvement in wellbeing for tenants owing to an increased level of independence. This finding was also confirmed on TGE's recent site visits to three Civitas properties, with the positive tenant outcomes described in the accompanying case studies.
  - In TGE's opinion, the quality of care is the primary factor determining well-being outcomes for individuals. Civitas has no legal responsibility or direct control over the quality of care delivered in its properties. Local authorities select care providers and the CQC monitors, inspects and regulates care services. However, Civitas does monitor the quality of care and this year hired a Healthcare Director to oversee relations with care providers; a demonstration of their recognition of the importance of the quality of care.
- Targeted actions to improve the quality of governance and financial management of Civitas' partner RPs, and a commitment to improving standards throughout the SSH sector.
  - Through the establishment of a Community Interest Company, Civitas is utilising its broad market influence to bring relevant actors and organisations together to share best practice.
  - Supporting the appointment of 30 board members to RPs across the sector demonstrates Civitas' utilisation of its privileged position within the market to help organisations improve governance standards. It is TGE's view that this evidences Civitas' broader market role in helping to increase the formalisation of what is a relatively nascent market.
  - The implementation of both a Force Majeure clause, and cap on rent increases, to contracts with RPs provides demonstration of Civitas' improvement in managing risk capacity. TGE views this as a positive step in responding to the concerns of the Regulator.
- 3 Demonstrated improvements in the standard of asset management across the portfolio.
  - TGE considers the hiring of a Director of Asset Management to be a positive step towards ensuring that homes remain high quality and fit-for-purpose, both now and in the years to come.
  - The portfolio-wide review of necessary improvement works which is currently underway provides an indication of Civitas' commitment to preserving the quality of its properties for the long-term.



As Civitas' portfolio grows, so too does its impact



## Update on Potential Weaknesses and Mitigating Actions

- 1 The specialist RPs in the SSH sector can have limited institutional capacity and financial strength.
  - A critical success factor for Civitas is selecting high quality RPs and Care Providers as ultimately these are the entities directly providing services to tenants.
  - From an impact risk perspective, the failure of an RP has the potential for a resultant disruption to services and a
    detrimental effect on residents' well-being.
  - First Priority, an RP Civitas previously worked with, failed in terms of both governance and operational delivery and five RPs currently have regulatory judgements or notices against them.
  - Based on information provided by Civitas, we remain reassured that the Fund is attempting to support its partner RPs to build their organisational capacity. The appointment of board members to RPs across the sector, and the establishment of a CIC to offer governance and financial management advice to RPs, provide two examples of actions Civitas is undertaking in this area to support both its partner RPs and the wider sector. The CIC is still in its infancy with only one member, and TGE will continue to monitor its operations as it scales up.
  - Civitas are also in the process of negotiating a Force Majeure clause with all 15 partner RPs in order to mitigate against
    the financial and impact risks arising from the potential non-performance or failure of an RP. TGE considers this a
    positive step mitigating the risks associated with lease-based models.
- 2 Civitas has no direct relationship with its ultimate beneficiaries the often vulnerable adults that live in Civitas-owned properties.
  - As a landlord, Civitas does not have day-to-day interactions with its tenants such interaction is the legal responsibility
    of RPs and Care Providers.
  - TGE welcomes Civitas' openness to carrying out a Tenant Outcomes Survey. Whilst a similar survey was not conducted
    for this report, TGE plan to repeat this exercise for the next full-year Impact Report and scale it up to reach a larger
    sample of tenants in the coming years.
  - As previously noted, Civitas monitors the performance of the quality of care and this year hired a Healthcare Director to
    oversee relations with care providers. The impact of this hiring will be monitored by TGE and an update provided in the
    full-year Impact Report.

TGE continues to believe that private investment needs to play an important role in social housing. This is particularly true in SSH, where grants can't be accessed, and the alternative for many people is to remain in institutional or residential care. Within this context we feel that Civitas is acting as a responsible and deliberate impact investor. They continue to commit time and effort to increase the effectiveness of RPs and strengthen the entire sector.





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# APPENDIX

# Appendix 1: Alignment with the UN Sustainable Development Goals







Civitas is contributing toward Sustainable Development Goal 11: "Make cities and human settlements inclusive, safe, resilient and sustainable".

Within this Goal, Civitas is supporting SDG Target 11.1: "By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums."

Civitas is also supporting Goal 17: "Strengthen the means of implementation and revitalise the Global Partnership for Sustainable Development", Target 17.17: "Encourage and promote effective public, private and civil society partnerships, building on the experience and resourcing strategies of partnerships."

Civitas is also contributing to Goal 3: "Ensure Healthy lives and promote well-being for all at all ages", Target 3.5: "Strengthen the prevention and treatment of substance abuse, including narcotic drug abuse and harmful use of alcohol."



# Appendix 2: List of Registered Providers

REGISTERED PROVIDER	OVERVIEW	REGIONS OF OPERATION
Auckland Housing Association	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	North East
Bespoke Supportive Tenancies [BeST] Ltd	A specialist provider of accommodation in the supported living sector for vulnerable individuals	National
Blue Square Residential Ltd	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	National
Chrysalis Supported Housing Association Ltd	A specialist provider of accommodation in the supported living sector for individuals recovering from harmful addictions	South East, South West, Wales, West Midlands
Encircle Housing Ltd	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	National
Falcon Housing Association CIC	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	National
Harbour Light Assisted Living	A specialist provider of accommodation in the supported living sector for individuals with a range of disabilities	North West
Hilldale Housing Association Ltd	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	North West
IKE Supported Housing Ltd	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	East Midlands, North East, West Midlands, Yorkshire and the Humber
Inclusion Housing CIC	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	National
My Space Housing Solutions	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	North East and North West
New Walk CIC	A specialist provider of accommodation in the supported living sector for vulnerable individuals	North East
Pivotal Housing Association	A specialist provider of accommodation in the supported living sector for vulnerable individuals with specific needs	South West
Trinity Housing Association Ltd	A specialist provider of accommodation in the supported living sector for vulnerable individuals with specific needs	National
Westmoreland Supported Housing Ltd	A specialist provider of accommodation in the supported living sector for individuals with a range of complex care needs	National

 $6 ag{3}$ 

# Appendix 3: List of Top 10 Care Providers

CARE PROVIDER	OVERVIEW	REGIONS OF OPERATION
Alternative Futures Group	Leading nationwide provider of care services for adults with complex care needs and young people in transition	North West
Care Management Group	Support provider for individuals with learning disabilities and particularly complex needs, aiming to enable people to live independent lifestyles	East of England, Greater London, South East, South West, Wales
Eden Futures Supported Living	Support services for people with learning disabilities, autism, mental ill health and associated complex needs	Midlands and North of England
Essential Care & Support Ltd	Care provider for individuals with a range of learning disabilities, mental health conditions and physical disabilities	North East
Exemplar Healthcare	A specialist care provider that provides support for a wide range of physical and mental conditions	Midlands and North of England
InMind	Care provider for individuals who have complex mental health needs, personality disorder and physical health needs	East Midlands, London, West Midlands, Yorkshire and the Humber
Lifeways	Leading nationwide provider of supported living and residential care services for individuals with diverse and often complex needs	National
National Care Group	Leading provider of care and support services to vulnerable adults with a wide range of disabilities and needs	National
Northern Healthcare Ltd	Supported-living and recovery service for individuals with a range of care needs now operating throughout the UK	National
TLC Care Homes	Residential care and supported living services for adults with learning disabilities	East of England

THE GOOD ECONOMY

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