

## Submission:

### Social Housing Green Paper

#### National Housing Federation response

6 November 2018

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#### Summary of key points:

In this response we have set out our thoughts on how the relationship between residents and landlords can be rebalanced, and how we can ensure every housing association resident has a voice that is heard.

As well as responding to the ideas and suggestions put forward by the Government in the Green Paper, [we have explained what role we think sector-led change can play](#), and how the work we are doing with our members to develop a clear offer for residents can contribute to this important agenda.

In sharing our views and ideas, we have not answered every question in the Green Paper, but we have grouped this response under the five general headings:

1. [Ensuring homes are safe and decent](#)
2. [Effective resolution of complaints](#)
3. [Empowering residents and strengthening the regulator](#)
4. [Tackling stigma and celebrating thriving communities](#)
5. [Expanding supply and supporting home ownership](#)

We have also provided a [summary of our key points](#).

## Introduction

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The National Housing Federation, the trade body for housing associations in England, welcomes this opportunity to respond to the Government's Social Housing Green Paper – A New Deal for Social Housing.

We are encouraged by the Prime Minister's personal mission to fix our broken housing system, which she set out clearly at the Federation's National Housing Summit in September, and by the Government's current focus on social housing. The Prime Minister's acknowledgement in the Green Paper of the "vital role" that social housing has to play in ensuring that everyone has "a safe, secure and affordable place to call their own" sets a helpful tone for the important questions the Green Paper raises.

Housing associations are committed to playing their part in restoring pride in social housing – as the Secretary of State and the Prime Minister have called for – and in rebalancing the relationship between residents in social housing and their landlords. This is something we have been talking to our housing association members about for some time. Through our work with our members to develop an Offer for Tenants ([see section on sector-led change](#)), we have stated our ambition as a sector to be as accountable as possible to the people we house.

We want to ensure every housing association resident can be heard and that residents are genuinely at the heart of everything we do. We want to see more social homes built, and we are ready to deliver. We are driven by a commitment to ensure the safety and decency of our homes. And we are committed to answer the Prime Minister's call to use our "unique status, rich history and social mission" to play a key role in "changing the way tenants and society as a whole think about social housing". To be effective, residents, landlords, the Government, the media, and society must all play their role.

Housing associations in England house more than six million people. They develop new homes for social and affordable rent, shared ownership, private rent and market sale, and homes for people who need support to live independently. Housing associations are independent not-for-profit organisations. While they represent an incredibly diverse sector, all are driven by social purpose, and their mission to ensure everyone has a good quality, safe place to live that they can afford.

Housing associations have faced a challenging operating environment in recent years, including the reduction in investment to build homes for social rent and the 1% rent cut, which we estimate permanently reduced the sector's capacity by £3.85bn. This has often meant that our members have had to make difficult decisions about what to prioritise. Despite this, the sector has remained ambitious, building new homes to address the housing shortage, regenerating existing homes and communities, and continuing to provide quality homes and services for residents.

Many of the measures recently announced by the Government, including additional investment in social rent and a return to an index-linked rent settlement, will help the sector to do more. We particularly welcome the acknowledgement from the Government that it sees housing associations as key partners in building the homes we need.

However, if we are to truly address the housing crisis and the deep-rooted issues of stigma facing many people in social housing, we believe the Government must be bolder. It must put its

full weight and support behind a big expansion of social housing across the country, returning it to a tenure of choice and aspiration.

Our members have clearly acknowledged there is more our sector can do, and there is no room for complacency. We also urge the Government to ensure our housing offer in this country addresses other issues not explored in the Green Paper, including domestic abuse, rough sleeping, homelessness, and the need to ensure vulnerable residents are supported, to ensure no group is left behind.

This response reflects the views of the members and residents we have spoken to by calling on the Government to take the steps required to a New Deal for Social Housing a reality.

## **Our response**

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In this response we set out our thoughts on how the relationship between residents and landlords can be rebalanced, and how we can ensure every housing association resident has a voice that is heard.

As well as responding to the ideas and suggestions put forward by the Government in the Green Paper, we explain what role we think sector-led change can play, and how the work we are doing with our members to develop a clear offer for residents can contribute to this important agenda. We also set out our ideas for what more the Government and the sector can do in partnership to build more homes, including homes for social rent.

In sharing our views and ideas, we have not answered every question in the Green Paper, but we have grouped this response under the five general headings:

1. [Ensuring homes are safe and decent](#)
2. [Effective resolution of complaints](#)
3. [Empowering residents and strengthening the regulator](#)
4. [Tackling stigma and celebrating thriving communities](#)
5. [Expanding supply and supporting home ownership](#)

This response has been shaped by extensive consultation with our housing association members, and conversations with housing association residents. We have also worked closely with the Local Government Association, the Greater London Authority, and the Centre for Public Scrutiny. We welcome the engagement that we have been able to have with the Ministry of Housing, Communities and Local Government.

The Federation would welcome the opportunity to talk to the Government in more detail about this response and would be happy to facilitate further conversations, working groups and roundtables with our housing association members and their residents.

Alongside this response, [we have contributed to the Call for Evidence on the Review of Social Housing Regulation](#). We also look forward to the evidence collection exercise the Government intends to carry out on allocations policies across the country, as we know this has a big impact on the people our members house.

## **Summary of key points**

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Throughout this response, we have made a number of points and recommendations about how we think we can achieve the objectives we share with residents and the Government, namely 'a new deal for social housing'. These are as follows:

### **Overall**

- Future changes to the social housing sector should be based on resident experience and on evidence of what works, and should support the role of housing associations as successful social organisations, delivering vital homes and services.
- We agree there is a need to rebalance the relationship between residents and landlords, and to ensure every resident's voice is heard. This requires leadership and the right culture, but we also recognise the importance of having mechanisms in place to provide support and assurance that boards are taking this role seriously and it is working properly.
- Our members aim to be as accountable as possible to the people they house, and commit to being open, honest and accessible. To achieve this, as a sector we are developing a commitment to some specific principles and standards, shaped by what is important to residents. Our aim is do this in a very open way, setting out a clear offer through a charter.

### **Ensuring homes are safe and decent**

- Housing associations' first priority is providing safe and secure homes for their residents. More can be done to foster an open, honest and collaborative approach to engaging with residents on safety. We are committed to working with our members and the Government to pilot innovative new ways of communicating and engaging with residents on safety issues.
- We support the aspiration for a modernised and updated Decent Homes Standard. We think it should be applied to all rented properties and be informed by resident priorities.

### **Effective resolution of complaints**

- We agree that the complaints process needs to be more effective. We think the Ombudsman should be properly resourced, and we support the removal of the democratic filter.

### **Empowering residents and strengthening the regulator**

- We support a more proactive approach to the regulation of 'consumer issues' as an important way of supporting boards, providing assurance for residents, and taking action where necessary.
- We intend to revise our Code of Governance to include a clear principle on resident voice and customer service, with the aim of ensuring the accountability of boards in this respect is clear.
- Transparent data on performance and satisfaction should be used to assure, inform and empower residents. It should be developed in partnership with the sector, the Government and the regulator, but shaped by what is important to residents.
- We back the A Voice for Tenants call for the creation of an organisation that can speak up for people who live in social housing on the national stage.

### **Tackling stigma and celebrating thriving communities**

Tackling the stigmatisation of social housing residents will take meaningful change, and we urge the Government to show leadership and support a resident-led public awareness campaign about social housing.

### **Expanding supply and supporting home ownership**

- Increasing the supply of social housing is critical if we are to ensure everyone can access a good quality home they can afford, and more people can access social housing, returning it to a tenure of choice. This will require bold action by the Government, particularly on land.

## **Rebalancing the relationship between residents and landlords**

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The tragic fire at Grenfell Tower exposed not only issues with building regulations and cladding, but also a huge difference in the experience of people living in social housing. This was evident in the ministerial roadshows held with residents in advance of the Green Paper's publication.

Many residents spoke very personally about the pride they have in their home and the strength of their relationship with their landlord. Others spoke of feeling powerless and not listened to. As landlords, housing associations are fully committed to addressing this challenge and are striving to make the experience of housing association residents as positive as it can be. Our members are determined to ensure they genuinely and demonstrably put residents at the heart of what they do, and we welcome the current debate about how best to do this in the Green Paper.

We have numerous examples of housing associations who have created a culture and way of working that is based on an equal relationship with residents. Where they recognise the needs, aspirations and voices of their residents, use this insight to inform decision making at every level, open themselves up to challenge and scrutiny, provide opportunities for genuine involvement, and ensure all residents are listened to. [Appendix 1](#) includes a number of case studies illustrating the different approaches some housing associations have taken.

Members and residents have told us that the culture of the organisation and leadership are essential to achieving this. We, and our members, want to lead and embed the culture change that will see this good practice replicated in every housing association.

We know housing association residents are more satisfied with their home and tenure than residents in the private rented sector or with a local authority landlord,<sup>1</sup> but our members are not complacent. We also know that housing association residents want very different things from their landlord – many just want a good service and to know what to do when things go wrong, others want to be involved in how their landlord is managed and how decisions are made.

Fundamentally, this is about the sector being very open and honest about how we are doing, and being more accessible to residents and stakeholders. But it is critical that if we are to get this right we must listen to residents first and foremost, and recognise legitimate differences in priorities and expectations.

We also believe that more equal relationships between landlords and residents will add real value to the way organisations are run – bringing additional insight to decision making, as well as leading to improved resident experience.

As set out in this response, we believe there are some important changes we and the Government can make to drive and support this culture change, and assure residents their voices will be heard regardless of who their landlord is. Any changes must also respect the diversity and independence of the sector, and help housing associations continue to thrive and remain financially sound, so they can deliver their social mission and provide and build homes for future generations. In this vein, changes must also respect the diversity of residents and the services they receive from their landlord.

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<sup>1</sup> [English Housing Survey 2015/16 Social Rented Sector Report, Annex tables 1.11 and 1.12.](#)

We believe housing association boards have a critical role to play in this process, and it is their responsibility to ensure residents are at the heart of what their organisation does. However, we also recognise the importance of having mechanisms in place to provide support, assure, oversee and evidence that boards are taking this role seriously and it is working effectively.

The Federation and our members are clear that we do not want to return to a burdensome prescriptive regulatory regime that could detract from focusing on the issues that matter most to residents. We do however think there is an important role for the Regulator of Social Housing in providing assurance for residents and taking action where there is demonstrable failure. In order to do this effectively, we support a more proactive approach to the regulation of 'consumer issues' and have suggested a number of ways this could be done in this submission.

We believe more proactive regulation on its own won't rebalance the relationship between residents and landlords, or help the sector achieve its aim of being as accountable as possible to the people we house. We have been working with our members and tenant groups to explore the changes we can make ourselves to address the issues facing the sector. We believe these will make a genuine difference and empower residents to better hold their landlord to account. The work we have been doing and the difference we think it will make is set out in the next section on sector-led change and throughout this response.

## **Sector-led change**

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Our Offer for Tenants project was set up over a year ago to look at the changes we could make as a sector to help our members achieve our shared aim of being as accountable as possible to the people they house, and of being open, honest and accessible as a sector. We were very pleased to see this work referenced in the Green Paper.

Through this project, we are working towards making a commitment to specific principles and standards, shaped by what is important to residents. Our mission is do this in a very open way, setting out a clear offer, through a charter. The charter will do two important things:

- Provide clarity for tenants so they are better equipped to hold their landlord to account and feel assured that they will be listened to. Not only will they know what to expect, but they will also know what to do when their expectations aren't met.
- Provide a consistent framework for boards to lead, manage performance, and intervene where required.

We are developing the charter over this autumn and winter. We will work with residents and housing associations to understand what commitments would be important to residents, and how they can be meaningful. We will also work to understand how housing associations can demonstrate they are meeting the commitments in the charter, and what will happen if they don't.

We have some early thoughts on what will be covered in a charter based on conversations with housing associations and residents, including issues such as complaints, repairs, redress, services, communications, decision making and involvement. We will test and develop these in more detail and in partnership with residents.

Reflecting the need for boards and housing associations to design what is needed to meet their residents' needs, the charter will not impose or suggest any particular structures or ways of working on housing associations. It will provide scope for individual housing associations to reflect feedback from their own residents about what is important to them. The housing association sector is incredibly diverse, and the charter must be flexible enough to meet the needs of residents, whatever they may be. This can range from someone with no support needs living in general needs housing, to someone with severe learning disabilities who communicates through advocates.

We believe a charter has the potential to drive real improvement and support the culture change we are committed to as a sector, but to do this we will need to develop an effective and robust oversight mechanism.

The charter is something that boards could actively report against, in much the same way they do currently on the Value for Money Standard, and we will explore what role residents can play in providing oversight on the delivery of the charter.

Demonstrating delivery of the commitments in a charter could also provide helpful assurance to the regulator if it takes a more active role in 'consumer issues'. For example, if the regulator takes a proactive rather than reactive role in regulating the consumer standards, meeting the commitments in a charter may be one way of demonstrating compliance, similar to how [our Code of Governance](#) currently works.

As we have said elsewhere in this response, boards are responsible for putting residents at the heart of what they do. We intend to revise our Code of Governance over the next few months to include a clear principle to this effect, with the aim of ensuring the accountability of boards is clear.

Working with our members to strengthen our accountability to the people they house is a priority for the Federation. We know it will take time for the changes we have outlined here, including the delivery of a charter, to have a significant impact on resident experience. Our Offer for Tenants project is a long-term piece of work, and we are considering what other support and mechanisms we need to put in place to ensure it delivers the outcomes we have identified here.

Throughout this submission, we refer to Our Offer for Tenants project and the difference we think a charter will make in response to a number of the questions posed in the Green Paper.

## **1. Ensuring homes are safe and decent**

### **1.1 Safety**

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Housing associations' first priority is providing safe and secure homes for their residents. The fire at Grenfell Tower touched the sector profoundly. As well as those organisations that are working tirelessly to fix building safety issues uncovered since the tragedy, the whole sector is considering its role and responsibilities to ensure an event like the Grenfell Tower fire can never happen again. We welcomed the £400m funding for local authorities and housing associations committed by the Government for the removal and replacement of unsafe aluminium composite material cladding.

The Federation and our members are supportive of the final report from the Independent Review of Building Regulations and Fire Safety, and we welcome the Government's commitment to reforming the system and regulations for keeping buildings safe. The report offered a clear direction of travel and a comprehensive approach to developing a new and more effective regulatory and cultural framework for building and managing safe homes.

Our members are vastly experienced in different models of resident involvement and engagement, covering a range of services and community issues. But they are not complacent and they understand more can be done to foster an open, honest and collaborative approach to engaging with residents on safety.

Since the Grenfell Tower fire, we have already seen a proactive response from our members to this challenge. Some organisations have chosen to set up dedicated panels and steering groups for residents to discuss improvements that can be made to the experiences of people living in tall buildings. Other housing associations are working with residents to design meaningful and accessible approaches to sharing important building safety information with their tenants and leaseholders.

We welcome the recognition of the good practice on engagement that already exists in the social housing sector, and we support plans to pilot innovative new ways of communicating and engaging with residents on safety issues within the sector. However, in designing, implementing and learning from these pilots, we encourage the Government to:

- Consider the applicability of new ways of working across tenures. Dame Judith Hackitt was clear in her report that her recommendations, including requirements for resident engagement on safety issues, should apply equally to the private and social sectors. Private sector residents deserve to feel as engaged in the safety of their homes as people who live in social housing do.
- Ensure approaches for engaging with residents on safety are tested within a variety of organisations and across a breadth of communities to ensure they are flexible enough to meet the specific needs of those residents.
- Consider how pilots will relate to and complement the work being done to develop the new safety case regime and 'golden thread' recommended in the Hackitt Review. The pilots should take into account that it may take months or years to implement some of the information requirements expected to come forward through the Hackitt Review implementation process.

Our members have also spoken to us about the limitations of some of the current processes and procedures to keep residents safe in their homes, and to help them to understand the vital role they can play to keep themselves, their families and their neighbours safe. These include, but are not limited, to:

- **Fire risk assessments (FRAs):** We support Dame Judith Hackitt's recommendation that a building's FRA should be a core component of the information that is made accessible to residents. However, there is a lack of consistency in how the process is carried out, the documentation that can be used, the monitoring of progress against actions, and the competence of the professionals who carry out the assessments. The Government should reform the regime through regulation to bring uniformity to the process. This would ensure that building owners and residents can be confident about the quality of information contained within an FRA, and clear about how fire safety concerns in a high-risk building are being managed.
- **Access to residents' properties for critical safety works:** A key barrier to successfully managing the quality and safety of a building is securing agreement and cooperation from both leaseholders and tenants for safety checks, system maintenance and necessary improvements. We strongly recommend that a right of access – under tightly specified, reasonable circumstances – is granted to building owners where critical safety issues are concerned.
- **Fire safety awareness:** Direct, frontline engagement between building owners and residents on safety issues is rightly the first order of priority in this Green Paper and the Hackitt Review. This essential work could be enhanced by a Government-led campaign to inform residents about how to prevent fires.

We recognise the broader safety concerns that have come to the fore since the tragic events at Grenfell Tower and support the principle of parity of safety standards for all tenures. In many ways, housing associations are already leading the way. The latest English Housing Survey shows that housing association tenants were most likely to have at least one working smoke alarm (95%) – compared to 89% of owner-occupiers, 88% of private renters, and 93% of households renting from a local authority<sup>2</sup>. We are also aware of a number of housing associations that have voluntarily introduced electrical installation testing on a five-year cycle.

Housing associations manage a far greater number of tenancies than most private landlords. As such, the time and resource implication of rolling new standards for housing associations and other social housing providers would be significant. There should be a thorough impact assessment carried out on the scale of this challenge and potential barriers to the execution of a new obligation, including problems building owners can have in accessing residents' properties.

## **1.2 Decent homes**

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The housing association sector's core offer is the provision of good quality, affordable homes with security of tenure. We know that housing association properties are in a better state of repair than other rented sectors, and comparable to owner-occupied properties. Recent figures show

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<sup>2</sup> [English Housing Survey 2016 to 2017: fire and fire safety, p.4](#)

that 88.1% of the sector's homes now meet the Decent Homes Standard (DHS), and since 2008 the number of non-decent homes has fallen from over 444,000 to under 290,000.<sup>3</sup>

Housing association properties are also less likely to contain serious hazards, and tend to be more energy efficient than other tenures.<sup>4</sup> It is important to note that for many housing associations, the DHS is very much a minimum standard, and internal investment programmes and priorities are driven by higher organisational standards developed in conjunction with residents.

Housing association homes are maintained by professional and responsive repairs and maintenance teams. The vast majority of associations offer a 24/7 service, whereby residents can contact their landlord to report a repair at any time. In addition, customers are often actively involved in the scrutiny of services, and are consulted on proposals to change policies or service levels. The sector also provides additional support to customers to help them sustain their tenancies and live well in their homes.

Housing associations are committed to building and maintaining quality homes that are fit for purpose now and in the future. Since 2010, housing associations have invested £11.9bn in their properties through planned maintenance and major repairs.<sup>5</sup> It is this investment, funded by internal resources and private borrowing, that has maintained and improved the quality of housing association stock.

In the 12 months to June 2018, the housing association sector spent £1.8bn on planned maintenance and major repairs, and further expenditure of £2.2bn is forecast in the 12 months to June 2019.<sup>6</sup> This ongoing investment is testament to the sector's commitment to the provision of quality affordable homes, and is driven by organisational purpose and standards, as opposed to external regulations or legislation. Our members have told us that they are exploring a range of ways in which they can improve future provision, including:

- higher and more flexible void standards, and the provision of quality furnishings when homes are let
- improved digital connectivity on estates and in homes
- more tailored customer offers to respond to individual circumstances and preferences
- leading the way in providing resilient, energy efficient homes to reduce energy costs for customers, and to rise to the challenge of climate change adaptation and mitigation.

The current DHS has been relatively successful in improving the quality of existing social housing stock. The simplicity and clarity of the standard, its links to the Housing Health and Safety Rating System (HHSRS) and the regulatory regime for social housing, mean it is understood by the social housing sector, properly resourced and demonstrably achieved.

When considering housing safety and quality issues, including those arising from the Grenfell Tower fire and the Hackitt Review, and a proposed review of the DHS, we need to be clear they

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<sup>3</sup> [English Housing Survey 2016/17 Headline Report, Section 2 Annex table 2.2](#)

<sup>4</sup> [NHF, Taking Stock, 2016](#)

<sup>5</sup> Regulator for Social Housing, Global Accounts

<sup>6</sup> [Regulator of Social Housing quarterly survey](#)

cut across all sectors, not just social housing. The DHS currently applies specifically to social housing.

We support the aspiration for a modernised and updated standard that should be applied to all rented properties and be resident-focused. An updated standard should reflect changes in the wider public policy arena, achievable resident priorities and expectations, and respond to progress in building technologies, performance standards and materials.

Fundamentally, the scope and shape of a new approach to the DHS should be mindful of the other cross-sector mechanisms and regulatory functions (specifically those emerging in response to the Hackitt Review) for dealing with the performance and safety of homes. This would prevent a confusing landscape of standards or approaches to maintaining safety.

Housing associations are increasingly focusing on the quality of data they hold on their homes and residents in order to deliver truly responsive services in the most efficient way. In this context, there is a perception that the DHS is overly prescriptive and rigid. It does not reflect some of the key issues for landlords and residents such as energy efficiency, affordability and the quality of the wider neighbourhood.

Many housing associations have taken steps to reflect residents' aspirations and provide choice as part of their current approach to asset management and investment. But this flexibility can be restricted by the prescriptive nature of the current DHS, sometimes leading to the prioritisation of expenditure on areas that are less important to residents. We believe a modern approach to the DHS should be based on the following core principles, elaborated on in the sections below:

1. Safety as an essential and clear foundation.
2. Flexibility to respond to resident priorities and needs.
3. Outcomes-based oversight.
4. Simple to comprehend.

### **1. Safety as an essential and clear foundation**

As discussed [at the start of this section](#), the safety of people in their homes is the first priority of any landlord, and this should be a clear and non-negotiable foundation for a new DHS. We believe there is scope to review the existing legal and regulatory frameworks in this space to ensure the future regime is clear and robust. This should take into account the Homes (Fitness for Human Habitation) Bill, which the Federation supports, and the Government's approach to implementing the recommendations of the Hackitt Review. A clear, robust and enforceable safety regime should apply to all rented homes regardless of tenure or landlord.

### **2. Flexibility to respond to resident priorities and needs**

The housing association sector provides homes for more than six million people through the ownership and management of more than 2.6 million homes.<sup>7</sup> The diversity and variation of these homes and the people that live in them is enormous. It is essential that a future DHS, taking safety as its foundation, recognises this diversity by ensuring investment priorities and

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<sup>7</sup> Regulator for Social Housing, Statistical Data Return 2018

standards can be developed and agreed locally between landlords and residents. Such an approach would avoid the perverse incentives created by the existing regime, and encourage meaningful dialogue between landlords and their residents about priorities and trade-offs.

### **Outcomes-based oversight**

The quality and performance of existing stock is one of the biggest priorities for housing association boards. The properties that housing associations own and manage provide security and stability for the households they exist to serve. The future viability of that mission and the association's finances depend on their stock being properly maintained. It is therefore appropriate that a future DHS should feed into the regulatory regime for social housing, so that boards can consider, for example:

- how they have developed standards for their stock in conjunction with residents
- how they are delivering those standards
- how their residents are able to hold them to account if standards are not met.

An outcomes-based co-regulatory approach would also have the scope to include specific outcome areas that reflect consistent resident priorities and wider public policy objectives, where these can be appropriately shaped by landlords. These could include:

- affordability
- energy performance
- resident satisfaction with the quality of the home
- modernity of the components and key amenities
- quality of the surrounding neighbourhood
- locally focused solutions.

### **Simple to comprehend**

The overriding ambition of any modernised standard should be that it is easy for the wider public and residents to comprehend, promoting transparency and accountability alongside constructive dialogue between landlords and residents.

Changes to the regulatory regime for social housing must take into account how a new DHS can be applied to the private sector. The Government should work with all sectors to ensure the outcomes of any new DHS are deliverable and, if necessary, should provide additional support to ensure they are effectively delivered.

Our members are committed to working with the Government to shape a new strategic approach to achieving decent, safe and comfortable homes, places that meet residents' aspirations and that are fit for the future. Housing associations are actively and continually assessing the current and future performance of their homes, and involve tenants in decisions about future priorities and investment. This long-term, tenant-led, holistic approach to value and performance sets the social housing sector apart from the private rented sector, and it is essential that a new DHS recognises and utilises this expertise and experience.

## 2. Effective resolution of complaints

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We have heard consistently from members and residents that the way in which complaints are dealt with is indicative of the culture and leadership of an organisation. How a landlord responds to a complaint or issue from a resident, and how easy it is for a resident to get in touch with the landlord in the first place, can have a big impact on whether residents feel listened to.

Many residents have told us that being able to complain easily and effectively, and knowing their complaint will be dealt with, is key to feeling empowered. [The case study in Appendix 2](#) shows how Soha Housing has designed its complaints process around its residents.

We support the proposal of removing the 'democratic filter', as explored in the Green Paper, which would make it easier for residents to seek redress.

The Ombudsman has an important role to play, and needs to be properly resourced and supported to play this role effectively. Many of our members have expressed concern about the current backlog the Ombudsman is dealing with, and how this may be adding to the sense of frustration that residents must feel.

We also support a single housing ombudsman for all sectors, including the private rented sector, as proposed previously – though it is not clear if this is still a priority for the Government – with a brief to focus on handling complaints and cutting waiting times.

Our members have acknowledged that, despite progress, some complaints procedures are still too complicated, do not focus on getting the best outcome for residents, and complaints are too slow to be resolved. We agree that residents should be supported to raise complaints, that the complaints process should be sped up, and that barriers to redress should be removed.

In [our Offer for Tenants work](#) we have been exploring how a charter could help drive improvements in complaints procedures. We, and our members, would like to see as many complaints as possible resolved as soon as the complaint is raised, rather than residents having to resort to the Ombudsman.

We know complaints procedures vary across the sector, and we want to learn from good practice. We think being clear with residents about how they can complain, what they can expect when they complain, and committing to clear, proactive communication throughout the process could be useful principles set out in a charter.

We know there are a lot of complaints about newly built homes in all sectors. This is concerned with developer-occupier disputes, as opposed to landlord-resident disputes. As the Government has recently announced it is planning to consult on a New Homes Ombudsman, we are keen to work together to ensure this proposed ombudsman is effective, and complements existing complaints mechanisms for housing association residents and homebuyers.

### **3. Empowering residents and strengthening the regulator**

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We welcome the focus in the Green Paper on how residents can be empowered to better hold their landlord to account. We are committed to working with residents to understand what information they need from their landlord in order to do this.

We know empowerment means different things to different residents. Not every resident wants to be involved in how their landlord is managed or to scrutinise decisions. But experience shows we make better decisions when we involve residents, and people feel more empowered when they understand how decisions have been made. As we have outlined in this response, we think this comes down to the culture and leadership of organisations, but there are changes we can put in place to support the necessary culture changes.

Our members have said that being transparent and open about how they are performing on issues that matter to residents and reporting this in a clear, meaningful and inclusive way should be a priority for housing associations.

We strongly support the idea that the regulator should take a more proactive approach to regulating 'consumer issues' and we think this could be done in a number of ways. In the first instance, we support having a lower trigger for reviewing delivery of the outcomes set out in the current consumer standards, rather than the existing serious detriment test. However, we need to ensure that the co-regulatory approach, which works very effectively, is maintained. We also need to ensure that resources are not diverted from the regulation of the other economic standards, and the focus on viability and governance is not lost.

We understand the imperative behind having a set of cross-sector indicators that would allow residents to make comparisons between landlords, and potentially allow the regulator to decide where it may need to do further work on compliance with regulatory standards.

#### **3.1 Providing residents with information on landlord performance**

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The Green Paper cites residents' concerns from the ministerial engagement events about both the performance and transparency of social landlords. It proposes that landlords should be obliged to publish key performance indicators (KPIs) covering five suggested areas: repairs, safety, complaints handling, resident engagement, and neighbourhood management, including dealing with anti-social behaviour.

We are fully committed to ensuring we are as open and transparent as we can be as sector, being honest with residents about how we are doing and what steps we are taking to address any issues or concerns. We think reporting information to residents, and opening up opportunities for residents to use this information to hold us to account, could also be a powerful driver for improvement.

We have not commented on the proposed set of indicators set out in the Green Paper as we think it is important to build an approach based on what is important to residents, and what information would give a meaningful sense of how an organisation is performing. We also think there should be scope to reflect local priorities and local circumstances if there is to be a sector-wide approach to reporting performance information to residents.

If we are to develop a more consistent cross-sector approach to reporting information to residents, which may include allowing comparisons between landlords, we must be mindful of the potential for perverse incentives. In the first instance, we think the housing associations and local authority landlords should work in partnership with residents, the Government and the regulator to see what might be possible and helpful.

In [our Offer for Tenants work](#), we have already begun to explore how we can be more transparent and open with tenants about how we are doing compared to expectations. For example, a charter could include a series of specific commitments on the information residents will have access to, what they can do with this information, and how their landlord will act on this information.

We have heard from many residents that they do not think league tables will make them feel more empowered or better equipped to hold their landlord to account. Residents cannot – at least not very easily – choose to move to a different landlord if a league table shows their landlord is not performing well. Therefore, this approach has the potential to entrench feelings of stigma among social housing residents.

The housing association sector is diverse and many organisations were set up to respond to very specific challenges or unmet needs. While we are very committed to providing meaningful information to residents, and support more regulatory oversight of ‘consumer issues’, we do not think it is possible to develop an approach to league tables that will reflect resident experience, take account of local priorities and circumstances, or take a broader view on how we work with our residents.

### **3.2 Rewarding good performance**

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The Green Paper includes the idea that KPIs should inform funding decisions, acknowledging that not all landlords develop but ‘most of the larger landlords do’. We understand the principles behind performance-related penalties, but have concerns about linking KPIs and funding decisions so directly, not least because of the broader issues with taking KPIs out of context, as we have said above. However, we do agree that there should be consequences if a housing association is clearly failing in its basic duty to residents, and we would strongly support action by the regulator in these instances.

There are already minimum standards on governance and viability attached to grant funding, which could be extended if there is more proactive regulation of ‘consumer issues’. We also think performance on a small number of measures over the previous 6-12 months is a poor criteria on which to judge over 30 years of investment in new stock.

### **3.3 Ensuring residents’ voices are heard**

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The Green Paper states: “Too many residents we met told us that their landlord did not take their views into account.” We know that from our recent conversations and work that different housing association residents want very different things from their landlord. Many just want a good service and to know things will be dealt with when they go wrong. Others want to be involved in how their landlord is run and how decisions are made. We think it is important to create scope for

landlords, working with their residents, to address both of these imperatives rather than imposing a one-size-fits-all structure on the sector.

The current consumer standards require landlords to provide opportunities for residents to engage and to influence policy, but they are under no obligation to engage residents in other ways. The Green Paper asks whether resident engagement and scrutiny measures are effective, and what more could be done to make residents aware of existing ways to engage and influence how services are delivered.

In [our Offer for Tenants work](#), we suggest a charter that could include commitments on meaningful two-way dialogues between residents and landlords, involving residents and communicating information on performance and decision making. Much of this information will already be available in other plans and information for residents, but we think a charter would ensure this information is very visible to residents. It would provide an opportunity for residents to scrutinise these commitments, and question where they do not think they go far enough or are not being met.

We believe all housing association residents have a right to have their voice heard, even if they do not go through the landlord's preferred procedure, and we think the charter is an opportunity to codify this for residents and landlords.

We strongly support the work of the A Voice for Tenants group and back its call for the creation of an organisation that can speak up for tenants on the national stage.

### **3.4 Strengthening choice over services**

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The Green Paper refers to residents having choice over services, for example cleaning services. It asks questions about Tenant Management Organisations and other ways of giving residents greater choice and control over the services they receive from landlords.

We think it would be very difficult for housing associations to offer residents ultimate control over the way services are provided or the choice of contractors. It is the landlord that is legally responsible for the provision of services, not to residents collectively but to each of them individually.

Similar comments apply to housing management more generally. As the Green Paper states: "Landlords need to retain clear oversight in standards, quality and safety, as well as keeping control of the value for money of contracts." Therefore, there is a limit to how much choice housing associations can offer residents over the way some services are run, and who provides the services.

However, we know social housing residents often have little choice about where they live or the services they receive. This has been a central consideration for [our Offer for Tenants work](#) and the drive to strengthen accountability in the sector.

There is lots of good practice across the sector demonstrating how landlords involve residents in decision making. The [case studies in Appendix 1](#) show a number of different examples of how this can be done very effectively.

We think a charter would provide an opportunity to go further, with landlords committing to a clear and transparent decision making process, providing clarity about how residents can get involved and, where appropriate, committing to open up opportunities for involvement as far as possible.

The Green Paper also talks about other initiatives such as Tenant Management Organisations, community housing associations, co-op or ‘mutual’ models, and Local Management Agreements. The housing association sector is varied and such initiatives are very welcome, but housing associations are independent and it is important that the Government does not seek to impose a preferred model or structure. We do, however, think ‘trailblazers’ to pilot models for community leadership, Tenant Management Organisations, Local Management Agreements and models allowing residents greater choice over the services provided and the contractors employed could be very helpful in establishing which models work effectively in different circumstances.

The Government is considering a new push for transfers of local authority stock “particularly to community-based housing associations” but does not say whether the ballot requirements will still apply. We are keen to see further details on this before responding.

### **3.5 A stronger regulator**

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We, and our members, agree that there is an important role for the Regulator of Social Housing to play in providing assurance for residents, and we support a more proactive approach to the regulation of ‘consumer issues’. Any changes should retain the principles embedded in the current co-regulatory approach and respect the housing association sector’s non-public classification.

Alongside this response, we have also submitted our views to the [Review of Social Housing Regulation: call for evidence](#). In that response, we have said we are keen to work with the Government and the regulator on how we can strengthen consumer regulation, without losing the current focus on financial viability and governance.

We do not believe the previous burdensome prescriptive regulatory regime made a demonstrable difference to the experience of social housing residents. Past experience demonstrates that there can be a disconnect – measures can improve, without having made a demonstrable difference to the experience and lives of social housing residents. For example, information shows that satisfaction with accommodation among social renters is similar now under the current co-regulatory approach to when it was under the previous, more prescriptive regulatory regime.<sup>8</sup>

We think there are a number of ways for improving the status quo, and reviewing how the current approach to the regulation of consumer standards works would be a sensible place to start. We also suggest that the consumer standards themselves are reviewed to ensure they still reflect what is important to residents.

If there is to be more proactive regulation of the consumer standards, which we think could provide a helpful mechanism for holding boards to account and providing assurance for

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<sup>8</sup> [English Housing Survey Table FA5401](#)

residents, we understand the regulator will need an alternative trigger mechanism to the current serious detriment test. Again, we think this could be done in a number of different ways.

One way of doing this could be for the regulator to have access to information that will allow it to decide whether further work would be appropriate. If this is the case, then we do not think a separate approach to the one we have committed to exploring for residents should be adopted, as included elsewhere in this response.

A self-certification approach to resident-facing services could have a helpful role to play. This could work in the way the Value for Money Standard works currently, where boards are required to demonstrate to stakeholders how they are meeting the requirements of the standard by publishing an annual self-assessment that is robust, transparent and accessible.

Obviously, if it comes to light that a provider has wrongly certified itself as compliant with consumer standards, this would be a major regulatory breach and as such should be dealt with by the regulator.

We think any regulation of consumer issues should apply to all housing association landlords and registered providers, regardless of their size, as it should be focused on the experience of residents.

We think that demonstrating delivery of the commitments in a charter could be a significant factor in giving assurance to the regulator, but it would not be compulsory, and compliance could be demonstrated in other ways.

As we have said elsewhere in this response, boards are responsible for putting residents at the heart of what they do. We intend to revise [our Code of Governance](#) over the next few months – which we acknowledge not all housing associations currently use – to include a clear principle to this effect, with the aim of ensuring the accountability of boards in this respect is clear. In line with this, we think any additional regulatory oversight should focus on the strategic role of the board, culture and leadership.

#### 4. Tackling stigma and celebrating thriving communities

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At our National Housing Summit in September, the Prime Minister said: “Social housing has for too long been pushed to the edges of political debate”. This speech, and the Green Paper, helpfully recognise the associated impact of this marginalisation on the diversity and integration of neighbourhoods, but also on those who call social housing home.

To tackle this stigma, we endorse calls for a resident-led, national, awareness-raising campaign. Working together, we can support and contribute to a public campaign to restore pride in social housing, similar to that felt for the NHS.

The Green Paper’s determination to renew our national commitment to social housing is a welcome grounding for such a campaign. Supply, too, must be part of the answer. The recognition that we need to build more homes for social rent must be followed up by bold action to make this happen. This will help to reverse the residualisation of social housing that has taken place in part because of stark undersupply, and will open up access to social housing so it can once again be seen as a tenure of choice.

Planning and allocations policies must support the delivery of mixed tenure communities. The role of planning can also help ensure the design and appearance of the homes we build guard against a division in the quality and look of different tenures built on a mixed site. Involving housing associations earlier in the Section 106 process would be beneficial.

In order to meaningfully tackle stigma and feelings of isolation, however, more needs to be done. To address the feelings of powerlessness and of being ignored that the residents of Kensington and Chelsea and beyond have spoken of, trust needs to be rebuilt. Solutions must address the issues that residents raised during the ministerial roundtables. This includes the stigma felt by many as the result of negative media and political narratives, and the impact of changes to the social security system.

Since 2010, we have had a significant increase in rough sleeping and the use of foodbanks,<sup>9</sup> and there is a particular imperative to understand how austerity has increased the stigmatisation of people on low incomes. While our members report varying levels of stigmatisation, supported housing providers told us that, when it comes to homeless hostels, homes for people with learning disabilities and services that support people with substance misuse, there is further stigmatisation that comes from a lack of understanding about these conditions and needs.

It is clear from our work with members, their residents and tenant groups, that solutions to remove stigma are complex. To be meaningful and legitimate, the response to tackling stigma in social housing must be led by its residents. To be effective, landlords, the Government, the media, and society at large must all play a role collectively.

The Federation supports the work of [See the Person](#) (previously Benefit to Society). We are ready to support their campaign in whatever way residents tell us we best can. We endorse their call for government backing, including resource for organisation.

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<sup>9</sup> [NAO, 2017](#); [Trussell Trust, 2018](#)

## 4.1 Role for landlords

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As social landlords, housing associations are committed to playing their part to tackle stigma and restore pride in social housing. We know from our conversations with residents that receiving a professional service from landlords and having the feeling of being listened to can help build pride in social housing, which in turn can help address stigma.

Through [our Offer for Tenants work](#), we have been talking to housing associations and residents to understand where and how we can do better on these issues. We believe that this work will achieve a more consistent and ambitious culture of openness and transparency, which in turn will build trust and accountability. In the collective effort to tackle stigma, we recognise the role of the professional landlord in treating all residents with respect.

We also know that in communities across the country housing associations are playing a vital role in contributing to thriving and resilient places to live and work. In addition to the provision of homes and services, our members invest in people and communities through community development initiatives, employment and skills support, health and wellbeing programmes, supporting local community and voluntary groups, driving social value through supply chains and myriad other projects and approaches.

Housing associations' commitment to such work is rooted in their mission and the recognition that a quality and affordable home is necessary but not sufficient for a dignified and fulfilling life. We are place-based organisations with the resources and local connections to develop tailored solutions to local issues, in partnership with residents and other local agencies.

Through [our Great Places programme](#), we are exploring how housing associations can have an even greater impact in places and communities, particularly in those that are facing long-term social and economic pressures. This collaborative and local approach must be central to tackling stigma and restoring pride, as the local perception and reputation of a place will be influenced by a wide range of factors over a sustained period of time.

Examples of the impact our members make:

- In 2014, 39% of housing associations offered some form of employment or skills support to their residents, and from 2014 to 2017 12,000 apprentices have been directly employed by housing associations in England.
- Nottingham Community Housing Association (NCHA) joined the Nottingham branch of Citizens UK to give its residents the chance to gain direct experience of how community organising and campaigning can drive real local change.
- The 10 largest housing associations in the Give us a Chance group invested £18.3m in 2016/17 in employment-related services, £15.9m of which was their own resource. If scaled up to the sector, this equates to £66.9m of housing association resource invested in employment and skills support every year.<sup>10</sup>
- In 2017/18, Greater Manchester Housing providers supported 2,219 residents into work and facilitated more than 11,000 apprenticeship hours.<sup>11</sup>

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<sup>10</sup> [www.ippr.org/files/2018-07/building-communities-that-work-july18.pdf](http://www.ippr.org/files/2018-07/building-communities-that-work-july18.pdf)

<sup>11</sup> <https://gmhousing.co.uk/about/social-value/>

## **4.2 Role for the Government**

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The Prime Minister has acknowledged that “too many politicians” are among those who “continue to look down on social housing and, by extension, the people who call it their home”. To effectively tackle stigma, therefore, the Government should lead by example and call out this pejorative behaviour when it occurs.

The Green Paper states the Government’s ambition to ensure social housing “can be both a safety net and a springboard”. The Federation recognises the British Social Attitudes survey findings that around two thirds of social tenants would prefer to be owner-occupiers, and we explore this in more detail in [our section below on supporting homeownership](#). However, as our members and their residents have expressed to us, we believe it is important to regard social housing as a positive tenure in itself. We believe that a society that values the tenure, and is ambitious for people who live in social housing, will also be one in which the stigma associated with these types of homes is reduced.

The Government also has a crucial role to play in long-term strategic investment in the housing system, to support both the supply of quality new social housing and ensuring existing homes and places are thriving. We have heard from many residents that the stigma they experience comes not from being a social housing resident directly, but from the quality of the estate or neighbourhood where they live, often in economically deprived areas.

## **4.3 Role for the media**

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The media are influential users of the stereotyping language that often fuels stigmatisation. As recognised in the Green Paper, See the Person has published a Fair Press guide for journalists, asking for fair representation and coverage. The press must be held to account for use of misrepresentative images, language and stories when reporting and commenting on social housing and social housing residents. Stigma associated with social housing poses profound challenges that we have a collective responsibility to address. It requires action at many levels of society to ensure that social housing residents never again feel that they are not being listened to. Our members are clear that housing associations can and must contribute to that change.

But we also believe that there is a case for exploring further what drives stigma, and the different forms it can take. This includes looking at stigma associated with place and geography, the uncertainty caused by changes to the social security system, and the groups most affected by austerity, who tend to live in social housing. It means questioning the extent to which stigma is associated with social housing, or whether this is part of a wider stigmatisation of those on low incomes or with particular needs. As explored above, and throughout this submission, it also requires addressing the undersupply of social housing and investment in existing stock. If we are to truly value social housing in this country, quantity, quality and affordability must not be traded off against each other.

This section in the Green Paper also covers broader community issues, such as aspects of anti-social behaviour and good design. We are supportive of the aspirations in this section and housing associations are often in the position of placemaker and community anchor, and play a wider role far beyond their key responsibilities.

## **5. Expanding supply and supporting home ownership**

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The Federation warmly welcomes the Government's recognition – in the Green Paper and in the Prime Minister's speech at National Housing Summit – that building new social and affordable housing is at the heart of tackling the housing crisis and central to the Government's supply ambitions.

As we've said throughout this response, expanding the social housing offer across the country so that many more thousands of people and families can access an affordable, good quality home with security of tenure, will be critical if we are to address the housing crisis in its many different forms.

Research for the Federation and Crisis shows we need to build 340,000 new homes in England each year, including 90,000 for social rent, to meet the country's long-term housing need.<sup>12</sup>

### **5.1 Expanding supply**

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The Prime Minister's announcements since the launch of the Green Paper, and measures the Government put in place in the last year, will help deliver tens of thousands more social and affordable homes. But to build all the affordable homes the country needs each year, we also urge the Government to:

- take action to make land cheaper and more easily available to build affordable housing
- make an ambitious commitment in next year's spending review for social housing funding over the next decade.

The cost and availability of land remains the single biggest barrier housing associations face to building more homes, more quickly. The complex interactions between the planning system, the developer-led 'speculative' homebuilding model, and the laws around land ownership and purchase have created a dysfunctional and inefficient land market. The solution is careful public intervention at national and local level to reorient the land market towards homebuilding. We therefore call on the Government to:

- reform the 1961 Land Compensation Act to ensure a fairer proportion of the uplift in land value is shared with the community, including for affordable housing
- commit to delivering 50% affordable housing across public sector land, to make best use of the additional control the public sector has over its own land, and compensate for under-delivery of affordable housing on private land
- deliver a transparent database of land ownership to make it clearer who is profiting from land ownership and how more can be made available for housing.

To deliver the social and affordable homes the country needs we will also need an ambitious commitment of grant in the next spending review period, building on the initial £2bn already announced.

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<sup>12</sup> [www.housing.org.uk/press/press-releases/england-short-of-four-million-homes](http://www.housing.org.uk/press/press-releases/england-short-of-four-million-homes)

We will work with members and partners over the next few months to develop detailed modelling on the finances necessary over the next spending review period to meet the Government's and our own ambitions to deliver. In recent years, housing associations have used the surplus from market sale to cross-subsidise the building of social and affordable rented homes. Our modelling will include looking at the limits of this model at scale and implications for grant.

## **5.2 The benefits of longer-term certainty**

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The additional £2bn in affordable housing grant for 2021/22–2028/29, which the Prime Minister announced at our National Housing Summit, sets an important and welcome precedent for longer-term funding beyond the spending review period. This is something the sector has called for over many years. We welcome the recognition in the Green Paper that funding certainty can make a “real difference” to how many affordable homes are delivered. Members tell us that the extra certainty this provides to boards and development teams is vital in developing their business plans, in order to:

- secure a longer-term supply of land to maintain delivery of new sites into the future, rather than running down their available plots towards the end of a funding programme and starting again at the beginning of the next
- invest long term in skills, both in the development management expertise needed in-house, and the construction skills needed throughout the supply chain
- invest in modern methods of construction and other new techniques over a longer-term pipeline, to guarantee an order book and delivery
- plan for longer-term partnerships to pool risk, expertise, land and finance with other housing associations, the public sector and private developers
- offer longer-term certainty for key contractors, particularly smaller and local construction firms, so they too can invest in new skills and technology.

We urge the Government to announce how the additional £2bn will be allocated as soon as possible, drawing particularly on the detailed work housing associations submitted to Homes England as part of their strategic partnership bids. These included detailed estimates of how certainty over grant beyond 2022 would bolster their delivery beyond their existing business plans. It will be important to ensure that the benefits are available widely across the sector, including to housing associations that do not have strategic partnerships.

We also urge the Government to consider how this principle of longer-term funding can be made more permanent. For example, with a ten-year rolling budget for affordable housing grant.

## **5.3 Housing associations and local authorities**

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We warmly welcome the lifting of the Housing Revenue Account (HRA) cap on local authority borrowing. This will take the brakes off building more homes. To solve the housing crisis we need housing associations, local authorities and private developers all building more affordable housing. We believe that partnerships will be vital in delivering this, and will be launching work soon to share the lessons of good partnership working.

## **5.4 Shared ownership**

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We share the Government's commitment to support people who aspire to home ownership but cannot afford to buy a home outright. Affordable ownership products have been a vital part of housing associations' offer for decades. In particular, the sector has played a pioneering role in the development of shared ownership. We are committed to promoting and improving the product further and exploring opportunities to innovate and widen access.

Housing associations built over 11,000 shared ownership homes last year. With more shared ownership homes being built over the next five years than have been built over the last 30, we believe now more than ever that it is the time to look again at the sector's offer and the product itself. We have been working with housing associations over the last few months to develop a new campaign on shared ownership, with three objectives:

- to develop a new brand and narrative for shared ownership
- to identify challenges, both real and perceived, for both housing associations and customers, and work to remove these wherever possible
- to create a national advertising campaign to raise awareness of shared ownership.

An important part of this work will involve identifying and tackling some of the practical barriers that people can face to accessing and progressing in shared ownership, particularly around staircasing and moving house. We are keen to work with the Government to address these.

## **5.5 New homeownership models**

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We believe in the importance of innovation and new thinking to design new ways to make home ownership more achievable for those who aspire to it. We are keen to work with our members and with the Government to develop and deliver new ideas. As one example of this, we are currently exploring a proposal – [Just One](#) – that would allow customers who cannot access shared ownership to own a home with a minimum initial share purchase of 1%.

Just One came from our [Creating our Future innovation programme](#), which brought housing association representatives together to co-create new ideas that have real social impact and can be scaled across the country, where markets allow. Just One has been designed to meet the needs of the large and growing number of families and other households that are stuck in private rented accommodation and want a secure home to call their own.

## **5.6 Community-led housing**

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We support an important role for community-led housing. Housing associations are well-placed to support communities to overcome many of the practical barriers they face in developing new homes. Many successful partnerships have seen community organisations work closely with housing associations to build new homes, with housing associations bringing expertise in development and management, alongside their long-term commitment to placemaking and communities.

The nature of these partnerships can vary. In some cases, ownership and control remain with a constituted community group but development and management is led by the housing

association. In other instances, particularly in rural areas, housing associations have successfully worked extremely closely with local communities to build, own and manage new homes even when the community group is not formally constituted.

We therefore urge the Government to ensure that housing associations are able to access funding to deliver community-led housing in partnership with communities, where genuine community ownership and leadership can be demonstrated.

## **Conclusion**

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We strongly welcome the Green Paper and the Government's recognition of the importance of social housing. In particular, we agree it is very important that residents have a meaningful voice, and that their views are the most important element of shaping any changes to social housing.

We are pleased that the Government is seeking to address the stigma felt by many social housing residents, which can have a huge impact on the quality of people's lives, but tackling this issue will require meaningful change across every part of society. As a start, we'd like to see the Government support work to develop a significant resident-led awareness-raising campaign with the public and media.

In considering how we can respond to the challenge of rebalancing the relationship between residents and landlords, we have been developing [our Offer for Tenants](#). Through this work, we aim to develop a charter, setting out landlord commitments to a series of principles shaped by residents, which will help residents better hold their landlord to account. We also think good proportionate regulation, more effective complaints processes, and meaningful information can play a key role in empowering residents.

Finally, if we are to truly address the housing crisis and ensure everyone has a safe, secure, affordable place to live, we must increase the supply of social housing. Housing associations will continue to work in partnership with the Government and local authorities to build the homes we need but, if we are to significantly expand our social housing offer and return it to a tenure of choice, we require further bold action by the Government.

While we were disappointed that the Government did not take the opportunity in the Green Paper to bring forward the significant solutions required. We look forward to this being addressed in next year's spending review.

## Appendix 1

### Case studies: putting residents at the heart of what we do

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#### North Star

North Star has a tenant voice scrutiny panel that reports into the board and regularly meets with board members without staff present. It engages directly with staff members at all levels of the organisation, focused on the service area or theme they are scrutinising. The board also gains input and assurance from tenants through:

- real time tenant feedback on services
- one-off focus groups on specific issues
- organic tenant groups
- tenant advisors.

Tenant voice is at the heart of the organisation's culture and the structures remain flexible to the needs of tenants and the business.

#### Riverside Group

Riverside Group has adopted a governance model that ensures tenants participate in the formal oversight of service performance through the neighbourhood services committee, which is a formal committee of the board. This committee comprises 25% customers as well as independents and nominees from the group board, the Riverside executive team and subsidiary housing associations.

The neighbourhood services committee considers performance data and questions service leads on trends, areas of great performance, and areas identified for improvement, and feeds this back to the group board. The same role is undertaken with respect to care and support customers by the Riverside care and support committee, which also includes customers within its membership.

This strategic approach is complimented by a national tenants body called Riverside Customer Voice, which considers strategic and policy issues as they relate to customer services, and a tenant complaints panel. This can consider customer complaints that have completed the internal complaints process, provide feedback, and make recommendations for resolution as well as putting forward lessons to be learned.

#### Yorkshire Housing

Yorkshire Housing's tenants are engaged in shaping the services they provide by:

- being members of the customer services committee (a subcommittee of the board) who receive regular updates on and influence the tenant involvement of the organisation
- tenants sitting on the complaints scrutiny panel
- tenants, residents and other service users being encouraged to join the customer voice panel – panel members are frequently surveyed for their views on service delivery matters
- tenants and other residents are invited onto focus groups to give their opinions on specific services they receive, and use this feedback to make changes where possible
- supporting tenants to run their own projects.

### **Thrive**

Thrive has established an independently chaired customer experience panel comprising residents – both tenants and leaseholders – and two board members who are full members of the panel, not board representatives.

The panel has developed its own dashboard of satisfaction with service measures that it monitors. Three of these appear on the corporate balanced scorecard. The chair of the panel has an 'open line' to the board chair and reports twice a year to the board. The board regards the customer experience panel as an important element of its assurance framework to be considered alongside other forms of assurance such as internal audit. The panel has been heavily involved in the development of a new strategic framework, emphasising the importance of quality service provision to existing customers as well as sustainable growth.

### **Aspire**

Aspire uses customer focus groups, a customer forum open to anyone who lives in an Aspire neighbourhood, and neighbourhood get together days to offer varied routes for resident engagement and involvement. This approach has delivered tangible business benefits in service delivery, such as simplified repairs reporting, and has shaped priorities for local areas.

### **Home Group**

Home Group has a dedicated customer involvement team, tasked with ensuring customers have genuine opportunities to shape decision making and strategy. This is one of the ways in which the organisation seeks to ensure that tenants' voices make up a core part of business planning. Other practical measures adopted are:

- an equal number of customers and executive team members on the board – the customers are appointed as independent board members rather than specific tenant representatives
- 79 customer promise assessments involving 648 customers visiting other customers to verify performance, increase the opportunities for customers to have their say about the service they receive, and make suggestions for improvements
- an independent panel made up of customers who investigate and resolve complaints
- key projects, such as digital engagement and regeneration schemes, are customer-led from the beginning.

### **Optivo**

Optivo's board comprises 25% residents. Each non-resident member is linked to one of their resident scrutiny groups. The groups cover both local geographic areas, and service groups – for example, repairs. Optivo's structure was co-designed with residents, and residents who want to be engaged informally can make use of a large range of involvement, including:

- working as procurement champions with staff on procurement projects including being on tender interview panels
- green champions to advise neighbours on green/sustainable initiatives
- resident forums on particular issues, and traditional residents' and tenants' associations for estates
- online resident discussion group called The Loop.

## **Appendix 2**

### **Case studies: putting residents at the heart of complaints**

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#### **Soha Housing**

Soha decided to make changes to its internal complaints process in 2013 following consultation with residents as part of its STAR survey and feedback from a review by its tenant scrutiny group. Both reviews highlighted that residents wanted a quick resolution, to be kept informed about progress, and treated with respect. As a result, Soha moved from a three to a two-stage formal complaints process and revamped its visual and digital communications of the process.

At the same time, Soha set up an independent tenants' panel comprising members of its tenants' forum who were not members of Soha's board. The panel is registered with the Housing Ombudsman, and meets biannually to look at:

- formal and informal complaints including trends or improvements
- the details of any stage two complaints (anonymised)
- serious detriment cases
- relevant policies or procedures
- publications from the Housing Ombudsman, the regulator or sector consultants.

Soha is also considering whether the panel could look at a sample of responses following a complaint to ensure it is being fair and consistent in its approach.

Soha's tenant auditor group reviewed the complaints service in 2016 and made a number of recommendations in relation to a more systematic way of reporting informal complaints. This enabled it to identify any trends or make improvements before it became a formal complaint. It is currently implementing a new computer system and has incorporated a number of the recommendations into the specification.