

SOCIAL HOUSING GREEN PAPER

A New Deal for Social Housing

About Us

The Northern Housing Consortium (NHC) is a membership organisation that works with local authorities and housing associations across the North to advance the cause of housing. Our membership covers around 90% of all social housing providers in the North. The NHC brings its members together to share ideas, and to represent their interests and to ensure they are heard at a regional and national government level.

Introductory Comments

The work of the NHC has consistently been to represent the social housing sector. To that end the Green Paper, 'a new deal for social housing' sets out some significant opportunities and challenges which go to the heart of what social housing is intended to do and poses questions we should embrace openly and enthusiastically.

The Prime Minister talks about how social housing provides the stability people need and the Secretary of State reaffirms the idea that social housing is the "first social service".

At its most fundamental social housing can be considered to be properties that are let at low rents and on a secure basis to people in housing need. But it is so much more than that. Irrespective of anyone's connection to the social housing sector, all of us would recognise the basic need to have a roof over our head. The Green Paper attempts to deal with the fundamental issues of home, safety and community. But, beyond those fundamental needs, there are also the wider attributes provided by social landlords which add value to the lives of their residents. The Green Paper seeks to recognise this complexity of service provision and we very much welcome this debate.

The themes of the Green Paper are essential consideration for housing providers of the future. Housing associations and local authorities have been at the forefront of finding alternative ways to tackle the growing needs of residents. Landlords have continued to adapt, respond and re-define their role and purpose since the market diversified. They are continuing to identify new competencies in order to be sustainable in the future and provide choice and new products. But they will need to transform even further and we are already seeing larger organisations and new ways of delivering services to a diverse range of customers. The strengths of the sector remain the same – quality, affordability and security.

A fundamental question that has to be asked based on the proposals for tougher regulation, greater transparency and more accountability is this: would the tougher measures proposed prevent the Grenfell tragedy from ever happening again? The circumstances at Grenfell are matters for the ongoing police investigation and the Grenfell Tower Inquiry but it is incumbent upon all of us in the social housing sector to look again at our procedures and take lessons away. Disasters have serious impacts in the immediate aftermath including many which are difficult to quantify – the psychological damage, the social and cultural upheaval, but, from this can build change. This comes from all of us having a shared responsibility.

On a final comment that we feel is important to be made on behalf of the social housing sector in the North, our membership organisations reported to us that their relationships with their residents is a largely positive one; that residents had all of the information they needed to comment, complain or generally feed back to the landlord. Satisfaction levels were high overall and there were continuous efforts to engage and listen to resident's concerns. This comment is recorded in our response, not in any way to indicate complacency: far from it. But it is incumbent upon any policy maker to look to retain what works well and to not disrupt those settled arrangements.

Our detailed responses to the consultation questions set out below are based on dialogue with senior representatives from housing associations and local authorities at a series of roundtable events across the North.

Consultation Questions

Chapter 1 Ensuring homes are safe and decent

1. How can residents be supported in working with landlords to ensure homes are safe?

We have talked to our members to gather evidence for this question and it is clear that social housing landlords take very seriously the safety of their residents. This is reflected in the very tangible measure of the remediation work which has been completed on 70% of social high rise buildings. Social housing landlords know there is never room for complacency on safety. If a resident notices something is wrong there has to be a way they can be heard.

Specific points to note:

- A resident engagement strategy for buildings should set out how landlords will share information and engage with residents on safety issues.
- Residents can be supported by being provided with appropriate information on safety, including the publishing of fire risk assessments for all high-rise blocks. This supports residents to identify all of the risks and probability of where safety might be compromised.
- Reviews of the risk assessment and an update of evacuation policies should also be communicated clearly to residents.
- An annual residents' meeting would be a useful forum for communicating about fire safety with residents. This would enable communities to move to a proactive role in helping to manage hazards and risks.
- This latter point would help with a further issue raised by landlords in that there are some barriers to supporting residents. Whilst many residents strive to bring about change and improvement in their living conditions, conversely there are circumstances when residents are resistant to changes and are not necessarily convinced of the risks to their health from problems such as refusing access for gas safe checks or not participating in fire drills.
- To support landlords in this role, there would be positive benefits in greater clarity and transparency to the complex way in which hazards in homes are classified. Landlords have repeatedly reported to us that

there is conflicting advice on fire safety. This would not only support landlords but would make it easier for residents to enforce their rights.

- There could be a greater role for the fire service in supporting landlords to reinforce good safety practice. Residents we have spoken to respond positively to the presence of the fire service and we can see a benefit for landlords and the fire service to work together on this.

2. Should new safety measures in the PRS also apply to social housing?

Social housing landlords consider that they have robust health and safety arrangements, meeting or exceeding statutory requirements.

Compliance with current standards is an important factor to be taken into account across all tenures. Despite a raft of new legislation relating to the private rented sector (PRS) and significant improvements in landlords' professional standards, there is evidence that safety is still compromised in too many private rentals. In the PRS there is a huge gulf between the best and the worst and research suggests that high numbers of private rental properties are not compliant with current safety laws.

In the North PRS accounts for 19% of all housing (social housing 19% and owner occupiers 62%). 24% of PRS are non-decent housing with 13% of social housing not meeting the standard. Only 34% of PRS properties have carbon monoxide alarms fitted and 150,000 PRS properties are in breach of regulations¹.

There is a view that any new regulatory measures should be proportionate and specific to the type of property as not all landlords have high rise property. If requirements are to become more robust, all tenures should be considered including owner occupiers.

3. Are there any changes to what constitutes a Decent Home that we should consider?

Within the social housing sector, the Decent Homes Standard has been significant in increasing the number of homes meeting and exceeding quality standards and ensuring a comprehensive approach to safety. Social landlords have reduced the percentage of their non-decent homes to 13%.

It is right that social housing should meet and, where finances support it, to exceed standards. There are already many examples of social landlords taking action to achieve standards higher than the minimum but, overall, having a more ambitious standard than the current one, when 13% are striving to meet the standard will present challenges for some.

- Efficient heating - to be fit for the future, there is a need to identify aspirational standards and benchmarks for energy savings and emissions reductions in refurbishment for different property types.

¹ Figures are based on a survey of 2,000 UK PRS tenants conducted in August 2018 by AXA Insurance

² Association of Public Service Excellence Hollowed Out The Impact of Financial Localisation on Neighbourhood Services October 2018

³ NHF The scale and scope of housing associations activity beyond housing 2012

⁴ Social Return on Investment (SROI) is a framework for measuring and accounting; it seeks to reduce

- Noise insulation – many older properties fail to have adequate levels of noise insulation, not only to protect from external factors but, internally this can often be the cause of complaints between residents.
- Safety - additional requirements for fire alarms, carbon monoxide alarms or sprinklers as standard and more frequent inspections will have a significant resource implications.
- Interdependence of health and housing – when health and safety is considered in relation to housing, ‘safety’ takes precedence – understandably. But the reality for many people in poor quality housing is that their home could be the cause of their health problems or the cause of them not being able to recover from illness, or leave hospital. Poor condition housing harms people’s health and well-being and carries considerable costs for the NHS and social care system. This is mainly a concern in private housing but we feel that if this is further emphasised in a revised Decent Homes Standard all tenures would benefit.

To achieve more ambitious standards, fit for the future, the key issue in the social sector will be proper investment and a stable rents policy.

4. Do we need additional measures to make sure social homes are safe and decent?

The following point has been made to us several times and it is worth review as we feel this is an inhibiting factor in handling safety requirements.

This relates to improving the user-friendliness of the overall suite of building regulations guidance.

We would propose that all requirements relating to safety should be brought together into a cohesive framework. The regulations are already complex and contradictory, particularly on fire safety. There needs to be one safety framework to include all of the requirements, and deal with the responsibilities and barriers social landlords may encounter such as access to certain properties. Such a framework should also incorporate the expectations of residents for the communal areas of buildings.

On a further point, we support Karen Buck’s proposals in the Homes (Fitness for Human Habitation and Liability for Housing Standards) Bill to amend the relevant sections of the *Landlord and Tenant Act 1985*. It is welcome that this extends to all housing tenures - councils, housing associations, private landlords and build-to-rent will be on an equal footing. Moreover, it gives residents access to direct enforcement of housing standards.

Chapter 2 Effective resolution of complaints

5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

We have welcomed the Government’s intentions to improve redress across the housing sector. Complaints are widely recognised amongst our members as integral to the provision of quality services at both individual and strategic levels.

The Green Paper, and earlier consultations on consumer redress, go a long way to giving residents better access to redress, where it has previously been piecemeal and confusing.

During our engagement sessions, talking to residents about how they feel about where they live, and how services are provided to them by their landlord there was a very clear acknowledgement that mediation and local resolutions are important to them — the de-escalation of potential complaints is important and needs to be adequately supported to be complementary to the whole complaints process.

There is always scope to look again at how procedures work to listen to resident's concerns and make sure that action is taken when necessary, however strengthened mediation requires capacity and resources such as those from the third sector which is depleted.

6. Should we reduce the 8 week waiting period to 4 weeks, or should we remove the requirement for the 'democratic filter' stage altogether?

The democratic filter should be removed entirely. The system acts as a deterrent to genuine complaints and residents should have the ability to apply directly to the Ombudsman without delay.

7. What can we do to ensure that the 'designated persons' are better able to promote local resolutions?

The designated person's role acts as a barrier to redress and should be abolished. The process of complaining should be fast and effective from start to finish.

8. How can we ensure that residents understand how best to escalate a complaint and seek redress?

It is right that there is debate on the way that residents seek redress and for all providers to look again at their processes. All of the member organisations we spoke to felt that there was clear evidence – from their complaints data and satisfaction data – that residents did have sufficient access to information about how to raise a complaint and that an effective response process was in place.

In terms of any new framework on receiving and managing complaints a number of points were made:

- To assist with a mutual understanding between resident and landlord it is important to factor in the nuance in dealing with complaints such as recognising what is a complaint, and what is a service request, and also managing expectations is important.
- Requests may not always be complaints. There is an important role for frontline staff in recognising what is a request, or a comment or a complaint and, in particular, what is a safety issue which may need immediate action.

- Residents should be able to put forward ideas or proposals about the service they receive, or the place they live in, without having this framed as a complaint.
- As part of a wider feedback model, representations should, as far as possible, be sought out and welcomed as a measure of satisfaction and as part of performance improvement measures.

No discussion on the escalation of complaints would be complete without reference to the role of the Housing Ombudsman.

There seems to have been uncertainty about the future of the Housing Ombudsman role since at least 2014 and The Gordon Report, *Better to Serve the Public: Proposals to restructure, reform, renew and reinvigorate public service ombudsmen*. The report recommended a new single public service ombudsman comprised of the Parliamentary Ombudsman, the Health Service Ombudsman, the Local Government Ombudsman and the Housing Ombudsman. The subsequent consultation on the establishment of a Public Service Ombudsman excluded housing on the basis that a scheme set up to investigate failures in public service should not extend to the private provision of housing. In any event, no legislation followed this consultation. Further consultation on Strengthening Consumer Redress in the Housing Market (February 2018) put forward the suggestions that “*a single ombudsman scheme...has the potential not only to create a stronger brand, giving consumers a clearer sense of where to go, but also to help ombudsmen more effectively drive service improvements.*” Government has yet to provide the outcome of the consultation. It would be hoped that this will be within the timescales of the Green Paper for a joined-up approach to consumer redress.

We fail to see how a new Social Housing Regulatory Framework can be drafted without complete clarity on the role and relationship between the Regulator of Social Housing and the Housing Ombudsman. Any Regulatory Framework must provide a clear and effective delineation of jurisdiction and an effective working relationship between the Ombudsman and the Regulator. This is essential for driving up standards in the sector.

The Housing Ombudsman also offers a positive and effective alternative to the courts as a method of resolving tenancy disputes. In October 2017 reference was made by the then Communities Secretary to forthcoming consultation on a “new specialist housing court”. Again, a new framework for complaints and redress could include a refreshed approach to legal redress as an option for tenants.

9. How can we ensure that residents can access the right advice and support when making a complaint?

One of the difficulties reported to us is that one source of advice and support for residents is through the third sector which is very much depleted. Landlords have found themselves looking for other options to support mediation such as neighbour support or resident spokesperson.

If Citizens Advice and similar community-based advocacy services can play a key role in supporting good community work, then the capacity should be available to fulfil that role.

10. How can we best ensure that landlords processes for dealing with complaints are fast and effective?

It is unacceptable for residents to wait many months for an issue to be resolved or responded to.

Our members are aware that a common theme during stakeholder engagement is the need for complaints procedures to be both fast and effective: complaints need to be 'sorted' one way or another but, as is often pointed out to us, some complaints take time to resolve.

NHC roundtable discussions with residents have shown a wide variation of methods in the way that residents are listened to and it is appropriate that variations and local flexibilities should be in place.

Any model needs to accommodate the different nature of complaints and that for some complaints speed isn't a measure of success and there are other complaints which may legitimately require time to resolve. If a timescale is imposed, we would recommend a Staged Process would be necessary to account for different categories of severity with complaints.

A model could include three distinct stages which would include the landlord acknowledging the complaint straight away, and if necessary, providing routes to conciliation, mediation or other services to help resolve matters. Beyond that, stages 2 and 3 would be for more complex issues to be resolved.

We feel it would be a backward step if heavy regulation were to stifle innovation and local flexibility in this area.

For Boards, there should be recognition that evidence gleaned through complaints is prized information to help towards performance improvement and strong accountability principles.

11. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress frameworks?

Landlords' assessment is that they have robust health and safety regimes in place through existing frameworks. There must be absolute rigour in terms of identifying what is a complaint, what is a comment or request and what is a safety concern, with the latter initiating immediate response.

Chapter 3 Empowering residents and strengthening the Regulator

12. Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?

It is right that residents have all of the information they need to be able to judge how their landlord is performing. Social housing landlords want to achieve transparency and accountability. We therefore support the objective of a compilation of a balanced set of indicators which address operational efficiency, targets achieved and good customer service. What this model may be lacking is a judgement on how well residents are being treated by their landlord and this perhaps is more important than a blunt comparison on numbers.

Landlords already gather vast amounts of data and a basket of Key Performance Indicators (KPIs) can contribute further towards supporting choice and openness. But the way this basket of indicators is set up and used will be crucial to its effectiveness, and, most importantly, to its usefulness to residents.

As a started point we felt it was important to consider the information already collected and published and also, to look back at any models which may offer features with some merit in the current context.

- Housing Inspectorate of the Audit Commission – Some of our members felt there had been merits to this level of independent central approach which looked at improvement and good practice. The outcome was a star rating and judgement over the services provided. Underpinning the inspection regime was a series of Key Lines of Enquiry (KLOEs) setting out characteristics linked to overall judgements on service. These included a series of cross cutting themes such as value for money as well as service specific areas such as leaseholder management, etc. In preparing for inspection, often many organisations' starting point was a 'gap' analysis between what they currently did, and what the Audit Commission would expect to see in a three star organisation. The KLOEs also proved a useful aid for internal audit.

Notable feature: It looked at whether a landlord was using all its available powers and influence to drive forward a tangible housing vision for the locality, balancing its housing market and delivering better outcomes for the community, including disadvantaged groups - KLOEs aimed to give a broader view of how housing is linked to other local issues - like economic development and sustainability.

- STAR (Survey of Tenants and Residents) - involves periodic surveys of customer perception and can be used a sector benchmarking tool. Measures customer satisfaction and allows providers to compare results with each other. This is not part of a regulatory requirement but it provides a standardised approach to satisfaction measurement that enables providers to make meaningful performance comparisons with other service providers.

Notable feature: Providers find it useful to be able to measure what they need to in ways that best suit their local and resident needs, and when large numbers are using the method, trends can be monitored and compared over time.

- The Sector Scorecard – a set of metrics for business health, development (capacity and support), outcomes delivered, effective asset management and operating efficiencies. This has broad support across the housing

association sector and is overseen by an independent advisory group giving it credibility.

Notable feature: enables housing associations of differing sizes to compare results and cross-references with varied work that housing associations do to increase supply, deliver good services to customers and effectively manage their fixed assets.

- A Local Housing Offer - The local offer shows how services provided are tailored to meet the diverse and unique needs of customers – tailored specifically for the services needed in the local neighbourhoods. In developing the Local Offer landlords consult with residents in a number of ways following analysis of both formal and informal complaints, telephone and postal surveys and face to face contact throughout the year. Local Offers cover 'Home', 'Neighbourhood' and 'Tenant Involvement & Empowerment' and will be outcome-based.

Notable feature: Simple and effective targeted outcomes providing realistic, tangible ambitions for residents and then the reporting of achievements on the offer set out.

We set out the above comparators only to note the features of each which are reported to be of value to landlords and residents, not as an alternative model to the KPIs proposed in the Green Paper. However, we cannot emphasise enough that the proposed model must be set up in full consultation with the sector in terms of the indicators to be measured, and how they will be published and used by landlords and residents.

The following points were made during the evidence we gathered. They are put forward for completeness of the review as part of the consultation process. The comments are in no particular priority order but have been categorised under three headings which constitute the different users of the KPIs. A summary of the main points (the points repeated most often) is set out at the end of this section.

Residents

- There was considerable uncertainty about how residents will make use of the information presented through KPIs and league tables. On the basis that a resident cannot change landlord in the same way that a customer might change an energy provider, the driver for improvement doesn't necessarily rest with the resident but with a desire by the landlord for a higher position on a league table, linked to proposed reward incentives.
- It was felt that for the residents to exert pressure on a landlord to improve services, the full range of other measures in this Green Paper need to be effective. This particularly applies to scrutiny by residents as this supports the balanced relationship between landlord and resident.

- Further work by the Regulator would be required to establish if these KPI's describe what the residents care about and how local issues will be accounted for. A reflection of local issues in the new model may best serve the residents of an area.
- Residents need to be informed how their feedback has driven improvements against the measures.
- Residents should consider how they will use the indicators to judge what represents good service, as a measure at a point in time and for future improvement.
- It is likely that residents rely on local information about location and community rather than single statistical measures of performance.

Landlords

- The model seems to allow no adjustment for local market variables. Residents may like a simple and easy-to-digest set of tables however for landlords it is a crude measure which could distort the good work of many landlords.
- There are too many differences between organisations and areas to force fair comparisons across local authorities, housing association, national spread vs. local spread, rural vs. urban and regional contexts.
- Data needs to be representative and contextual. KPI's could either be too simplistic or come with too many caveats or huge amounts of contextual information.
- Even with the use of value added data, the performance of a landlord serving disadvantaged areas may not fully be accounted for in the league tables and therefore gives a misleading impression of the quality of the provider.
- Measuring performance on neighbourhood management and ASB will be impacted by local circumstances which are largely out of the control of local housing providers.
- The model should be an outcome based approach with a local focus.
- Chasing PIs could stifle innovation – the mind-set of 'if it isn't measured, it doesn't count' - particularly, when measurements are linked to rewards. This moves focus away from services not included in the indicators such as digital innovation.
- Information should be included in Board reports

Regulator

- It is important that indicators are set which provide a useful (to landlord and resident) reflector of performance and seek to strengthen areas where comparative performance may be less than optimal.

- The Regulator must consider how residents will use this information and how it will drive service improvement, looking at future service provision, not just on past performance. This could be linked up with In Depth Assessments.
- KPI's could encourage gaming the system with the potential of reducing access to complaints and focusing on the easy wins. In a worst case scenario, some landlords may not accept certain residents.
- It is important that the model is established in a way that doesn't skew behaviours so that it is difficult for residents to register complaints if it means that those landlords encouraging honest feedback find themselves at the bottom of a league table.
- Attaching funding motivation to PIs could be an additional incentive to warp behaviour.
- League tables provide a quick and relatively simple way to compare providers, however, they cannot give a rounded picture of the characteristics of each area which is also vital.
- KPIs should be tangible and measurable – "Respectful and helpful engagement with residents" cannot be defined as a measure. It can however be recorded as a compliment if feedback is received.
- Compliance with what is already in place is an issue and this is where the focus should be – outliers where there is a breach of existing standards.
- Consideration should be given to what else residents might want to measure e.g. financial health, affordability, time waiting for a property, re-let standards. Also, safety should be at the heart of them.
- KPI's should focus on the customer experience – there is a danger that this will move into statistical viability when the focus should be on residents and satisfaction.
- KPIs may be too simplistic a method for measuring and holding to account landlords on ASB. This may involve a calibration of % of cases resolved and overall customer satisfaction. The police, local authorities and housing providers work in partnership and should be held equally to account.
- Streamlining of data may be required – a considerable amount of performance reporting already takes place and this ongoing work could be built on and formalised.
- Equality-related impacts should be considered for their impact on particular residents from service issues and neighbourhood problems. This also helps to ensure a diverse range of voices are heard, for example what measures do different groups value - young people, ethnic minority groups and people of working age or with families.

- Indicators should continue to evolve in consultation with the sector.

In summary

- KPIs published through league tables, depending on the indicators used, could be a simple, useful method to achieve transparency and accountability, however:
- There is no certainty that this will result in residents being treated well or feeling as if they are receiving a good service
- There is uncertainty that these are the indicators that would be most useful to residents and also, how they will use this information to drive service improvement
- An outcome focused, improvement model would have most value
- Indicators should contextualise the vast range of factors which influence a providers performance against these measures, many of which are beyond the immediate control of the housing provider.
- In relation to the above point, we would propose a model with both national and local indicators.

13. Should landlords report performance against these key performance indicators every year?

We agree that KPIs should be reported annually to both residents and the Regulator.

14. Should landlords report performance against these key performance indicators to the Regulator?

There is faith in the Regulator being best placed to deal with the performance framework. Ideally, it should be built on existing arrangements for measuring performance and should also be sector-led like the VFM standard and metrics.

15. What more can be done to encourage landlords to be more transparent with their residents?

There are numerous case studies and much good practice to evidence how individual organisations have tried to achieve greater transparency to help residents engage with and influence service provision and decision making.

As an approach to standardise good practice, we are aware that the National Housing Federation is collaborating with the Centre for Public Scrutiny (CfPS) to consider how best to achieve this, and would support this development, discussion paper [here](#).

16. Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?

We would support consistency in the reporting of complaints.

In linking this to a performance indicator, it is important that perverse incentives are avoided whereby it is made more difficult for tenants to register complaints if those encouraging honest feedback find themselves at the bottom of the league table.

17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?
18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?

We support KPIs being drawn up by the Regulator but with genuine input from landlords and residents' groups.

The Scottish model has some merit with outcome focused measures which gauge progress and direction of travel as this corresponds with our view that improvement and outcomes must be part of a performance framework.

19. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord? What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?

We are concerned about the potential adverse impact – ultimately on residents – of a reward and punishment connection to performance indicators.

Incentives and rewards for best practice are a positive approach but it could be argued that those landlords at the bottom of the league table will require that the organisation has the resource to turn that around. It doesn't seem reasonable for poor performance on PIs to prevent an area in need getting support for affordable homes. It could create two tiers of organisations with those at the bottom of the league cut off from the much needed longer term funding and partnerships needed to move forward.

Also, there is potentially a lack of clarity in roles with attaching PIs to financial incentives which seems to blur the separation of the role of the Regulator and HE as the investor.

20. Are current resident engagement and scrutiny measures effective? What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?

Our members felt that current resident engagement structures in the social housing sector compared to other tenures, or even industries, are performing well in comparison. Roundtable discussions with residents have shown wide variation in methods in the way that residents are listened to and most useful is the 'no wrong door' approach to enquiries. That is not to say there should be complacency. The challenge is to be continuously raising awareness and communicating.

While there is recognition that accountability through scrutiny helps organisations to be more transparent and adds value to their work, we know that residents feel that tenant scrutiny often has no 'teeth'. The 'critical friend' role is one of the most challenging to get right. However, critical friend challenge from resident scrutiny can prompt Boards to think afresh from a different perspective and can provide evidence of how decisions are actually working on the ground.

Points of consideration we have heard included:

- Independent resident scrutiny provides a different set of perspectives to the views and reports from managers and provides the authentic, commonsense 'resident voice'
- Scrutiny should be designed with a tenant-led approach from the start – designed by and with tenants
- Organisations should talk to cohorts of residents experiencing particular issues
- There is a view that tenant scrutiny panels are not taken as seriously as external audit or LA scrutiny and this leads to disenchantment
- It is important to act on quick-wins identified by residents ahead of the production of a final report to demonstrate the Board is listening
- To provide 'teeth' for residents' groups there should be evidence that discussions have been taken on board
- Value for money is a requirement for landlords but is also an important area for residents whose rent pays for the services provided. Residents can be strong champions of greater value for money and in coming up with new ideas to improve it and should be involved locally in those discussions.
- If scrutiny has reviewed a service area, this provides assurance to the Board about performance and contributes to good governance of the organisation
- Responsibilities for residents include thinking beyond their own interests and listening to evidence
- There is an assumption that organisations are failing if they are not engaging with residents on scale. It is unrealistic to expect that all residents need and want to be involved – this would not be expected in other tenures and could contribute to stigma. It seems counter-productive to expect residents to play a role in governance arrangements when no other tenure places such a burden on.

HACT's [Rethinking customer insight, moving beyond the numbers](#), produced in partnership with 18 housing providers, is a useful attempt to bridge the gap which often opens up between the strategic necessities of Board business and customers' perceptions.

21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?

We supported the Chartered Institute of Housing's [Rethinking Social Housing initiative](#), and one of the key messages from the residents engaged with through that project is that there is a need for greater accountability and thought about how tenants' voices can be heard at national and local level.

Our members were clear that they want to support resident engagement at all levels in decision-making but establishing a 'need' for a national body should come from the residents themselves and must be right for them.

There was also a view that, as this is something that has been tried before; any new body should be based on purpose with sound structures.

It is relevant to consider other options such as:

- Expanding peer-to-peer engagement

- Analysis of where decisions are made that affect residents and considering what is the appropriate engagement mechanism at each stage
- Focus on eliminating barriers to engagement – it is only the minority of residents who will wish to play a role in governance but all residents expect a clear route to action if they encounter an issue.

A number of issues were raised on the proposal for a national voice by our members:

- a) A national body would have to be democratically answerable to all social housing tenants
- b) It would need a structure that could accommodate regional differences in terms of access to housing, affordability and quality;
- c) In relation to b) above, the structure should allow for cascading of influence at a local authority, sub-regional, regional as well as national level
- d) Tenants should be given support in developing the skills which make them fully able to represent the views of tenants, particularly at national level
- e) This could be further semi-professionalising residents and this prevents hearing the view of the silent majority of tenants
- f) Many cited the potentially vulnerable nature of some residents as a factor which impacts on their ability to be involved
- g) Adequate funding and access to national decision-makers would be necessary to be effective.

22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?

The evidence we have from our local authority members was that they were unconvinced of the business case for this suggestion, particularly local authorities with business plans to grow their own stock.

There was a view amongst our local authority members that they are also working for the community, but at a scale to make a bigger difference at local level. It cannot be assumed that a smaller organisation is equal to higher quality, or better management.

Community leadership works when there evidence of a demand from local communities to take on such responsibility and that there is a preference from moving away from a local authority landlord.

Taking into account everything else in this Green Paper – more robust regulation, new levels of regulation for local authorities, accountability to tenants, better quality housing, and performance monitoring, we must ask what the business case is for transferring stock away from local authorities which, after all, offer democratic accountability to communities through their local councillors.

23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?

The usefulness of this would need to explore the genuine demand for community leadership.

24. Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?
25. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?

Our members confirmed that in their experience, there is evidence of robust internal scrutiny and accountability and strong strategic links between Local Authorities and TMO's.

26. Do you think there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?

We have no evidence to support demand for this. There was general agreement in the evidence we gathered that the suggestion of residents taking on their own services is largely short-lived and impractical.

27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

Our members told us that residents are routinely involved in procurement panels and this has had positive benefits. It is positive that residents are involved in the selection of contractors and setting contractor specifications; for example, one member told us that residents had helped significantly with changes to a repairs contract.

Our evidence shows that this level of involvement worked well and there was felt to be a risk of placing too much responsibility on residents. The suggestion in the Green Paper of providing a list of approved contractors for individual residents to choose from was thought to be unhelpful and impractical. In other sectors the customer wouldn't be expected to be involved at this level.

If there are still quality issues to be addressed in contractor services, there could be more transparency on sub-contracted services with the publishing of a statement to residents.

28. What more could we do to help leaseholders of a social housing landlord?

It was felt that there are further opportunities through this national debate to engage with leaseholders.

The boundaries of liability between the landlord and the home owner in a high rise are unclear. This grey area can result in a disproportionate share of costs for repairs or other works being passed on by the landlord. In addition, landlords are often denied entry to enforce safety standards. These two issues are not unconnected as leaseholders often resist engagement out of fear of a cost.

Leaseholders could be a single point of failure on safety issues in an otherwise compliant high rise block. If this is linked to the regulatory framework there is the potential for a regulatory downgrade for a landlord when, in reality, they have no power to access the property.

Further guidance from Government is required on the extent of a social landlord's responsibility and liability in this regard.

In summary, further action is needed on the impact for landlords on meeting standards when access is not available, redress around service charges, clarity around liabilities, transparency around what is put into a lease, better defined service standards, and a more effective enforcement and complaints procedure for this group.

29. Does the Regulator have the right objective on consumer regulation? Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed, and if so how?

Generally, it was felt that the consumer regulation standards cover what should be expected by any provider of social housing, particularly as they are broad and cover the main service delivery areas of providers.

The social housing sector houses some of the most socially excluded and most vulnerable people in society. A regulatory framework must contain important safeguards to protect residents and ensure they feel secure in their homes.

On safety, landlords already have obligations to meet statutory requirements and discharge of those obligations is a matter for Boards and Councillors.

A proactive approach from the Regulator would require the gathering of compliance data from landlords and challenge being issued to those not complying with applicable laws e.g. gas safety. The advantage of this approach is that it would put at the forefront of everyone's thinking the importance of safety.

Compliance was an issue raised with us and possibly some form of self-assessments of compliance against all the regulatory standards not just the governance and financial standard. This would ensure that all providers have a continuous awareness of the objectives and expectations of all the standards which could inform continuous improvement.

30. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?

We support strengthening the role of the Regulator to provide a code of practice to accompany the consumer standards and ensuring that these standards are more proactively regulated, rather than the present reactive approach.

31. Is "serious detriment" the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?

Our evidence shows general agreement that 'serious detriment' is, not only a high bar, but also unhelpful in terms of when intervention would be possible.

The current 'serious detriment' approach fails to deal with serious complaints. Requiring proof of '*serious actual harm or serious potential harm to tenants*' rules

out intervention by the Regulator when there may be genuine concerns but the provider is compliant with the consumer standards.

A lower threshold should be set for the Regulator to take a more proactive approach, particularly where this relates to safety issues to ensure material issues are brought to the Regulator's attention.

It remains important that there is a threshold so that the Regulator isn't involved in everything. Guidance will be needed for the Regulator to gauge the level for intervention. Co-production remains important – if the Regulator becomes more prescriptive it was felt that this could undermine landlords' relationships with residents.

32. Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?

We believe that consumer protection is an equally important reason to regulate social housing.

We therefore support a greater focus on residents as consumers and listening to their needs in addition to a focus on finance and governance. A review of the regulatory standards in a way that puts the consumer standards on a more equal footing with the economic standards would be appropriate.

However, we have heard a consistent message from housing providers that co-regulation works and providers would want to see this approach continue with a clearer role for tenants in scrutinising performance and freedom for landlords to deliver high quality services, while the Regulator's attention will be focused on serious failures.

33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?

This will be a significant change for the Regulator. In theory this hasn't been necessary as there is accountability through the democratic process. This has felt like the right approach as it strikes a balance between national standards and local democracy. However, the Grenfell tragedy shows the limitations of this assumption.

Treating all social landlords as the same could be bureaucratic and complex. There are many different considerations of regulation and audit in local authorities in comparison to other parts of the public and not for profit sector, including on consumer standards.

We can see the logic of consistency of standards for residents, but subjecting one part of a council's role to regulatory scrutiny about the adequacy of its standards will be challenging.

34. Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?

When considering the new enforcement powers of the Regulator, what is clear from the table is that there is not consistency between those powers applicable to private registered providers and local authority landlords and this should be reviewed in light of other proposals in the Green Paper.

35. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?

Our local authority members report that all TMO boards have member councillors and report to the Local Authority as the 100% shareholder providing accountability.

36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?

Frequent Ministerial contact would be productive as a means of assuring Government that the Regulator is delivering effectively both its programme targets and its wider contribution to housing objectives.

Chapter 4 Tackling stigma and celebrating thriving communities

37. How could we support or deliver a best neighbourhood competition?
38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?

We full endorse a positive approach to tackling stigma in the social housing sector. The consequences of not doing so can be far reaching. Stigma can result in people being reluctant to access services, can make it difficult to address issues, and can present challenges for measuring impact of services.

In our engagement with residents they have expressed concerns about stigmatisation and this is tied into attitudes towards wider issues such as welfare and benefits. However, our members are clear that their ambitions are for positive outcomes for the people who live in their homes. But because social housing is providing for people in the most challenging circumstances, often the positive messages are ignored.

The support needs of some groups of residents in social housing with greater vulnerability and more complex needs plays a role in shaping perceptions of social housing.

Everyone in the sector must do their bit to challenge denigrating comments and stereotyping of the people who live in social housing. Telling positive stories is one way to do this.

Of course the sector needs to consider its own role as housing professionals but there is a wider need for action beyond the housing sector. Negative

stereotypes of social housing tenants have not happened in a vacuum separate from the rest of society. We need to hear less about 'DSS' and 'sink estates' and more about the why low-cost rented housing is so important to all society in ensuring everyone has a decent standard of living.

There is a risk of stigmatisation attached to some of the well-meaning proposals in the Green Paper. Some proposals could further stigmatise residents just by treating them differently. Street parties could fall into that category in being condescending and drawing attention to the people in social housing when the crux of it is to normalise living in social housing.

This is one of the most challenging aspects of the Green Paper. Addressing stigma requires a nuanced approach and we have collated a number of comments made to use through our evidence gathering:

Beyond the social housing sector:

- It is important to recognise that wider society is responsible for stigmatisation of groups of people, including the media portrayals of social housing tenants. Wider societal action is needed to break down these barriers
- Tackling stigma requires large scale campaigning activity to raise awareness and address negative stereotypes. We would highlight the [Time to Change](#) campaign to tackle discrimination in mental health, which has had impact in changing attitudes
- A significant proportion of tenants aspire to home ownership, but many do not. If home ownership is presented as the ultimate aspiration then this implies the opposite is true of social housing and fails to recognise the normality of living in housing that happens to have a social landlord.
- Policy should make a positive case for social housing as a destination, not a stepping stone to something better. Using social housing as a springboard to homeownership overlooks the fact that, for some, it is the right choice
- This proposal for street parties clearly comes from the right place – supporting and recognising the efforts of local communities but we have seen evidence that efforts to draw attention to issues sometimes has the unintended consequence of further stigmatising those who are the focus of the attention
- Across all policy, the value of social housing in society could be reflected in the content and tone of its messaging
- As part of a performance framework, positive stories about social housing landlords could help to break down mistrust between residents and landlords.

For the social housing sector:

- All housing staff must be aware of the language they use and ensure that their language is sensitive to stigma

- As landlords take forward their strategies, they should consider how to support cultural change in attitudes, and to break down stigma
- Frontline staff should be aware if they are also making assumptions about residents e.g. organising a repair and assuming the resident doesn't work. There needs to be an overall level of respect
- Celebration of communities and residents takes place at various levels, but organisations don't always have the resources for big projects
- Consideration could be given to whether stigma could be covered by a KPI for example, asking the question, would you live here, or something similar to the former STAR Survey – how people are getting on (community cohesion) – questions like 'do you like where you live'?

39. What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?

It is hard to argue against professional housing management. Our members agree that qualifications are useful but, arguably of more value are experience and knowledge – as well as empathy and respect. Being comparable to other professionalised services won't necessarily help residents with these qualities.

However, it was agreed that housing management knowledge must keep pace with recognition that the sector evolves and residents change and a professional standard would support keeping pace with change.

There is also a funding implication for any mandatory standard.

40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

Our evidence shows there is concern about how a simple KPI will measure something that is constituted by a variety of programmes and initiatives.

There are a number of points to note:

- Firstly, neighbourhood services have been the hardest hit of all since 2010, with the most deprived areas, on average, hit the hardest. On average, spending on neighbourhood services fell by 17% since 2010/11 with the highest reductions in spending of 36%. A recent report by APSE concludes "*Given the extent of statutory duties and the political sensitivity to child and adult social care, neighbourhood services will never be the top priority. Their defence depends on a better overall financial settlement*".²
- Secondly, for many landlords, these pared-down neighbourhood structures have by necessity included significant changes to staffing as the resources required to service numerous neighbourhood programmes is not available and this has meant that neighbourhood officers are

² Association of Public Service Excellence Hollowed Out The Impact of Financial Localisation on Neighbourhood Services October 2018

focused on day-to-day operations and administrative support leaving much less time for innovation and new initiatives than used to be the case.

- Thirdly, there must be greater understanding of how social housing estates have changed. On some estates, the social housing provider may be responsible for only a proportion of the properties. In some places RTB has brought about sustainable home ownership, but in too many others it has simply led to a transfer of housing into the private rented sector. Mixed tenure estates involving high levels of private renting are much more difficult for housing providers to manage and to provide neighbourhood services.
- Finally, consideration needs to be given to whether there is a perverse incentive in having a simple indicator at this level. Will less engagement make it easier to achieve a positive outcome against an indicator. For example, some landlords do valuable work with prison services and act as a link for ex-offenders, but ceasing interaction with ex-offenders may improve a KPI.

41. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?

Social housing providers are now, more than ever, responding to a wide range of support issues on behalf of their residents. An increased focus on allocating housing to those most in need has changed the demographic of who lives in social housing. This is to an extent linked to constraints elsewhere in the public sector, for example, in mental health services and other health related pressures are placing significant burdens on housing services.

Social landlords have reported that these non-housing related outcomes are increasingly the focus of their activity. There is an obvious benefit to housing providers in offering services on non-housing related activities including employment related support; health services; promoting independence; safer, stronger communities; creating better places to live; and community spaces. Our members are aware that without this support there is a significant increase in levels of rent arrears, anti-social behaviour, offending and drug use all of which are common reasons for eviction or abandonment of housing. Table 1 below gives an overview of 2011 data from the full audit of neighbourhood services conducted by the National Housing Federation picture to date of the scale and variety of housing associations' community investment.

Table 1 A year in numbers 2010/2011

2010/2011	
Employment & Enterprise services	574
Education & Skills services	1238
Wellbeing services	656
Poverty & Social Exclusion services	984
Safety & Cohesion services	1878
Environmental services	1472
Neighbourhood facilities	1000

Source: NHF The scale and scope of housing associations activity beyond housing 2012

The National Housing Federation's 2012 audit³ discovered that in 2006/07 Housing Associations invested almost £365 million to provide neighbourhood services, made up of almost £242 million from housing associations' own money. Table 2 below is an example from Progress Housing Group of the investment in social value.

Table 2 A Year in Numbers 2017/18

Progress Housing Group - the largest provider of supported living accommodation for learning disability and autism in England.	
PHG total no of tenants	10,253
No of supported living tenants	3195
• With sleep in support	62%
• With waking night support	27.5%
• Average support hours per tenant per week (shared and/or 1:1 support)	121 hours
Progress Lifeline connections for people across Lancashire receiving support through technology enabled care and support services	35,000 connections
Critical tenancy support service for customers at risk of losing their homes	154 referred in of which 81 supported
Financial Inclusion Service	271 people supported
Progress Futures is the service offered to tenants supporting them with training, education and employment	74 people supported
Homeless support	107 single homeless and 94 into interim homeless units
Refuge Accommodation	65 families fleeing domestic abuse
Independent living accommodation for over 55s	1,438 tenants

Table 3 below provides a snapshot of the scale of support over one year from Thirteen Housing Group

Table 3 – A year in numbers 2017/18

Thirteen Housing Group - One of the North East's leading providers of housing, care and support, employing around 1,500 people and owns or manages just under 34,000 homes	
Supported Units	Approx 344 homes
Extra Care Units	Approx 541 homes
Units for Older People	Approx 2391 homes
Homeless Trailblazer Key Step	172 customers
Money Advice Team	1052 customers (gain £2.7m in income, through unclaimed benefits, better budgeting, and arrangements with creditors)
New Directions Youth Employment Support	386 customers joined. 196 received an offer of employment, education or training
Supported Housing	583 customers
Floating support	2542 customers

³ NHF The scale and scope of housing associations activity beyond housing 2012

As housing associations seek to maximise and optimise the social and financial returns on all aspects of their work, many of our members use Social Return on Investment⁴ utilising financial proxies to estimate the positive impact that investments have on customers and other stakeholders. In 2017/2018, Wakefield and District Housing Limited (WDH) report the investment in their existing stock to secure future income streams was around £25m and the assessed social value to their tenants and communities is calculated to be £81m in year. See Table 4 below.

Table 4 WDH - Social Return on Investment (SROI)

2017/2018 Demonstration of investing social dividend to deliver new homes and create confident communities, sustainable tenancies and support to our most vulnerable tenants

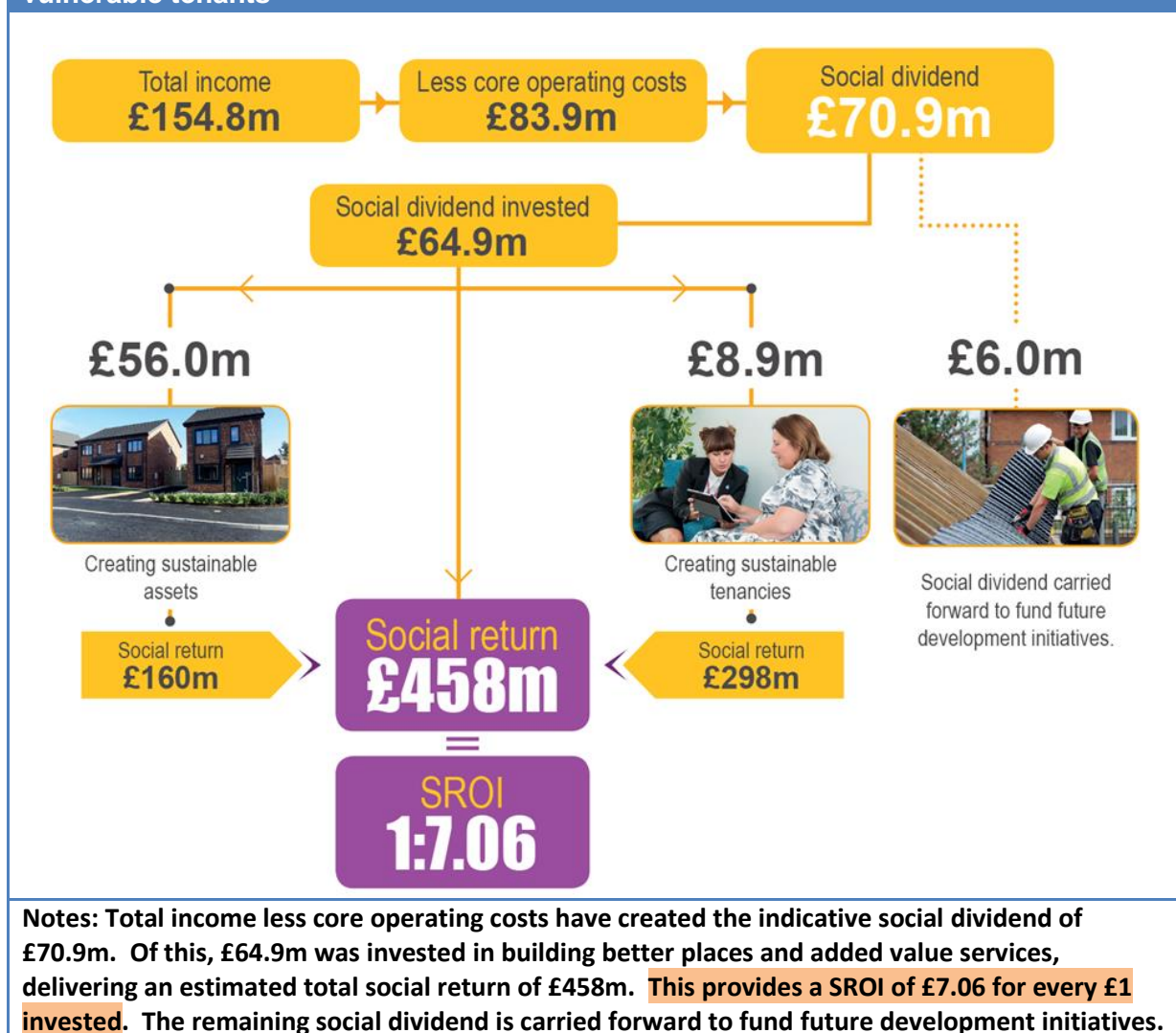


Table 5 below, again from WDH, provides examples of good practice and innovation in the form of case studies where these have had a positive impact on the quality of life of local communities.

⁴ Social Return on Investment (SROI) is a framework for measuring and accounting; it seeks to reduce inequality and improve wellbeing by incorporating social, environmental and economic costs and benefits. This enables a ratio of benefits to costs to be calculated. For example, a ratio of 3:1 indicates that an investment of £1 delivers £3 of social value

Table 5 WDH Case Studies where these have had a positive impact on the quality of life of local communities.


WDH one of the country's largest Registered Social Landlords and the largest rented housing provider in the Wakefield district, providing over 31,000 homes, 23% of housing in Wakefield. Employing 1,400 people	
Supporting tenants to manage their finances through our Tenancy Ready, Cash Wise and Debt teams	Secured over £700k in discretionary housing payments and grants, helping tenants sustain their tenancy and eliminating the potential costs associated with eviction, which can be as much as £8k per case. Debt Team generates a SROI of £3.98 for every £1 invested, and Cash Wise generates £8.51.
Providing our Care Link telecare and responder service to over 15,000 customers:	Gives individuals greater independence and reduces ambulance call outs, resulting in a potential saving of over £400k for the health service.
Providing wellbeing and mental health interventions	Improves individual's health and reduces the burden on the local health service by an equivalent of £1.3m each year.
Investing over £430k in apprenticeships	Ensures a sustainable workforce and, by assisting those most vulnerable, we estimate this will save the public purse over £5.6m and benefit the individuals by £2.2m in total.

Despite a body of research of the evidence, and much organisational level data, the full extent of additional support provided to people with complex needs is almost impossible to categorically assess. HACT the Social Impact of Housing Providers 2013 stated *"whilst social impact is of growing importance to housing providers, there remains a lack of effective tools and robust methodologies capable of capturing the full social value generated by the housing association sector"*.

Multiple and complex needs, by their very nature, fall across a wide range of strategy areas and agencies. However, housing is an important factor in enabling stability and a number of methods are used to measure both the scale of this additional support and the impact.

Table 6 below is an example from Magenta Living of the scale of issues dealt with at neighbourhood level.

Table 6 – Intervention in neighbourhood services

<p>Magenta Living is the largest registered housing provider in Wirral, owning and managing just under 13,000 properties and employing around 500 staff</p>	 <p>The infographic features the Magenta Communities logo at the top right, which includes the tagline 'Social value positive change'. Five circular icons are arranged around a central blue circle. The central circle is labeled 'Neighbourhood Environment' with the value '£7,295,034'. The surrounding icons are: 'Clearing Fly Tipping' (top left), 'Dealing with Graffiti' (top right), 'Garden Projects' (middle left), and 'Combatting Anti-Social Behaviour' (middle right). Dashed lines connect the four outer icons to the central circle.</p>
Anti-social behaviour positive outcomes	327
Vandalism / graffiti resolutions	61
Fly tipping	1158 incidences dealt with

42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?

Tackling poor behaviour is crucial to ensure the actions of inconsiderate individuals don't blight the lives of others. Social housing landlords take seriously the need to tackle anti-social behaviour but there has been some concern amongst social landlords about how they will measure their performance against an indicator and, in particular, how they will compare with other landlords.

A number of related points have been made:

- Defining anti-social behaviour – ASB could be noise, vandalism, gangs, neighbour disputes or more serious cases which are matters for the police including drug dealing and harassment. This relates directly to the landlords' complaints procedures and defining what is a complaint. Following a complaint it will often be necessary to investigate if the issue is actually ASB. The most common complaints received by councils last year were for noise (48%). Living next to a noisy neighbour can be extremely debilitating and have a serious impact on the mental wellbeing of the victim. But a noise complaint may relate to poor home insulation, or a neighbour with unusual working patterns.
- Managing expectations - resident satisfaction surveys often reveal higher dissatisfaction because of ASB than with any of the other services. If residents perceive that their landlord is not responding adequately to complaints of ASB, then this has an impact on the reputation of the landlord, even where satisfaction levels on other services may be high.

There is an issue with managing expectations, particularly if the ASB is of a serious nature and requires partnership intervention.

- Partnership working - it is vitally important that any measure accounts for partnership responsibility. We have heard that residents can be reluctant to report incidences of criminal behaviour to the police, preferring instead to report these to the landlord for fear of retribution. In addition, the police may be reluctant to use their powers for lower level problems and pass cases back to the landlord who has less power. There should be clarity about whether the responsibility for low level criminal cases lies with the police or the landlord, and there also needs to be greater awareness of the limitations landlords have to tackle such cases.

43. What other ways can planning guidance support good design in the social sector?

It is useful that the ambition for good design in the social sector is included in the Green Paper. There is no reason why social housing should not deliver high quality homes in pleasant environments where people want to work and live.

Health and housing are inextricably linked, so planning design and decisions should support physical and mental well-being.

There needs to be more detail on what good design looks like, for instance, does this include energy efficiency or the inclusion of green spaces that encourage walking, cycling and playing.

Also, this issue isn't just about new supply - ageing estates should be considered for their quality and desirability.

44. How can we encourage social housing residents to be involved in the planning and design of new developments?

We know from speaking to residents that involving local people in the design of homes raises the quality of new homes and the place as a whole.

This is directly relevant to issues of stigma when social housing estates are always identifiable as such. There is less likelihood of social housing being stigmatised if the homes are attractive places to live.

Involving local residents may require different ways of working, and also some additional resources. The best place to start with involving residents would be local planning documents. This may require local workshops and visits to successful projects with a view to understanding design principles and what can be achieved and being careful not to raise unrealistic expectations.

Chapter 5 Expanding supply and supporting home ownership

45. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the Government's current arrangements strike the right balance between providing grant funding for housing associations and Housing Revenue Account borrowing for local authorities.

The commitments made to support councils to build more council housing are indeed very welcome. The abolition of the HRA cap goes a long way to equalising the arrangements and will support a new generation of council housing as will abandoning the high-value asset levy and introducing greater flexibilities in the use of Right to Buy receipts. For the first time in many years, councils will be able to prepare longer-term HRA business plans.

However, for councils to have the same financial independence as housing associations they would need to reinvest 100% of RTB receipts and decide discounts locally.

This question recognises that it has been many decades since council housing made up a significant proportion of total supply, but it should not be a case of one part of the sector losing out against the other and overall more investment is urgently needed in social housing provided by both housing associations and councils.

A significant expansion in social housing is the single most important development that could solve the housing crisis for those in need of affordable housing.

46. How we can boost community-led housing and overcome the barriers communities experience to developing new community owned homes?

Our members welcome the opening of dialogue, and can see the benefits of local people leading on housing solutions but are cautious about the sustainability and viability of community schemes.

Concerns were expressed about the risk of small groups going into projects, attracted by investment but that the wider regulatory and governance work would be overwhelming for these types of organisations.

47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

The NHC welcomes a definition of affordability that protects and builds future supply of social housing with social rented homes being an integral part of any housing strategy.

Longer term funding would certainly be welcome as providers' business plans are made on assumptions.

It is imperative that more homes are actually built. But we remain firmly of the view that to deliver the 500,000 new homes that are needed across the North, new supply is only a small proportion of future supply and it will be important to continue to fund regeneration of the existing housing stock, particularly in meeting the requirements for affordable housing. This requires longer term funding for capacity, skills, brownfield remediation, and critically - neighbourhood regeneration.

The Green Paper doesn't deal with existing social housing even though this is often is a significant contributor to social stigma and poor attitudes towards social tenants.

Poor housing quality exacerbates exclusion. There is a pressing need to ensure that addressing the quality of existing homes is considered alongside the need for new supply.

Concentrations of housing where the quality, type or design are unpopular means that those who have housing choices leave. This results in persistently low values, high turnover and stigma for those who remain. Housing which may meet the definition of affordable, falls so far below modern standards it can exacerbate a loss of hope amongst residents. Essentially, this stems from the impact of limited scope for future intervention or investment, pressures on already limited neighbourhood management and the progressive undermining of community resilience through prevailing social factors. Residents are putting up with this, or moving to the far less stable private rented sector, due to lack of choice.

Improving low quality existing homes makes them safer, warmer, more attractive and easier to maintain.

48. How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?

The development of low shares to reduce the entry threshold to low-cost homeownership should proceed with caution. If the policy intention is for the sector to be a bridge to full home-ownership, potential purchasers must be made aware that in these circumstances an even greater equity gap will have to be bridged in order to 'move up the housing ladder' to the open market.

There is a view that people in shared-ownership schemes should be encouraged to buy the maximum share they can afford in their homes, not the minimum. It would be wrong to encourage people into home ownership if they would struggle financially – it provides affordability but also increased responsibility to maintain a property. Any policy on shared ownership should have flexibility in offering different proportions; if customers cannot reach around this level then it is not in their interest to do so when factoring in the extra responsibilities they would assume.

There may be more use in developing a product that allows for a change in circumstances – something that 'stacks up' financially for the resident, rather than the developer. We can see that this proposal might have use in high affordability areas but offering such low shares would seem to complicate the existing product, and would be a bigger cost to tenants in terms of conveyancing fees, and access to funding.

Also, specialist types of tenure such as starter homes, shared equity, self-build and rent to buy have not made a significant contribution to filling the gap between housing supply and demand. In fact, they may have obscured the clear need for new social housing. The initiatives have benefited only selected sections of those in need and have not provided meaningful solutions.

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