

Section one: Ensuring homes are safe and decent

How can residents best be supported in this important role of working with landlords to ensure homes are safe?

Keeping tenants safe is the most important responsibility we have as landlords.

After the Grenfell Tower fire our members carried out immediate reviews of their safety structures, protocols and procedures, including reviewing the posts, skills and expertise they have. Responding to these reviews, and to the Hackitt review recommendations, is of utmost priority for our members.

Many of our members are already working with residents to ensure the highest possible safety standards. We do not believe this involvement needs to be distinct from other local involvement, but we agree with the Hackitt Review that there must be clarity on the roles, rights and responsibilities for engaging with residents on health and safety.

Red Kite Housing has a Tenants Safety Core Group which meets with staff from the Compliance team. This reviews performance and helps monitor progress. They also have a 'Red Kite' standard which goes further than the Decent Homes Standard, which tenants were involved in the setting. A tenant group meets with the repairs contractor to ensure that they are delivering on their contractual obligations and that they are held to account.

At Soha some residents act as "portfolio holders" enabling them to get a deep understanding of an area of work and work closely with staff to improve practices.

We fully support the Hackitt Review's recommendations around fire safety including the publication of details of insulation and cladding materials for high-rise blocks.

We also welcome the proposal for residents to have access to published building safety information such as fire risk assessments, reflecting the Information Commissioner's earlier recommendation for housing associations to mirror local authorities in this way.

We recognise that we need to ensure that our communications on building safety and fire safety need to be simple. Residents told us "it needs to be understandable and meaningful if we are to have a role. Publishing a Fire Risk Assessment is fine but we have to be able to understand it."

We will work to publish residents' fire risk assessments on our websites via tenant portals to enable residents to check their own fire risk assessments. This will allow residents to find out about any works that need to take place to maintain and/or improve fire safety standards of their property.

Following the lead of members like South Yorkshire Housing Association, we will consider writing to all affected tenants to make them aware of the date and time the fire risk assessment will take place and invite them to be present to receive advice on home fire safety.

Should new safety measures in the private rented sector also apply to social housing?

When we asked residents this question they felt strongly that the same rules about safety should apply across all sectors. They also felt enforcement was essential and had to be robust.

Therefore, we recommend that all safety measures should be tenure blind. New safety measures in the private rented sector should apply in social housing.

Residents were also very clear that it was important the same property standards should apply in both the private rented and social rented sectors regarding not only fire safety, but also other elements of the Decent Homes Standard. We recommend these measures should be enforced for all private rented sector properties, but especially in those homes housing homeless and vulnerable households.

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

When we asked residents this question some thought that the Decent Homes Standard should cover other areas of the fabric of the building - internal walls, windows for example. Our members believe this is a key omission from the current standard – that it does not cover communal parts or areas – and these should be included, based on both health and safety and condition. Our members would also welcome further clarity regarding materials - for example what should and should not be used for fire doors.

We recommend the Decent Homes Standard is aligned with the Government’s green agenda. We consider energy efficiency to be extremely important, especially where poorly performing properties increase the likelihood of tenants experiencing health and wellbeing issues and fuel poverty.

Many of our members operate a ‘Decent Homes Plus’ standard, with locally applied additional standards to their homes. We would welcome the Decent Homes Standard being updated to reflect enhanced levels that most landlords work to, as opposed to simply the “minimum” standard. It would also be sensible to remove the ability for the minimum standard to be met whilst some individual components fail to meet the standard.

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

Safety considerations should be mandatory in organisation risk maps and each year housing providers should have to include a statement about safety in their annual report. Our members ensure properties they provide are maintained effectively, not just through reactive repairs, but through planned and cyclical maintenance programmes.

Additional fire safety measures could be considered – e.g. the fitting of sprinkler systems to flat blocks over a certain height (not necessarily high rise only), particularly to aid the means of escape (e.g. sprinkler systems to escape routes/communal areas).

But, overall, the minimum quality requirement of homes in the social rented sector means that they meet far higher standards of safety and decency than many homes in the private rented sector. It is at the lower end of the private rented sector that we believe there should be far more focus on improving safety and decency of homes.

Section 2: Redress and complaints

Should we reduce the eight-week waiting period to four weeks, or should we remove the requirement for the “democratic filter” stage altogether?

We agree that the democratic filter stage should be removed.

Removal of the democratic filter would allow residents to proceed straight to the Ombudsman as soon as the internal complaints process is at an end, mirroring the approach widely taken by other regulators.

Many of our members already involve tenants in supporting, advocating and mediating in complaints processes and we believe embedding these ways of working provide a more effective mechanism for resolving complaints than the democratic filter.

For example, Soha has a tenant's panel who are registered as their democratic filter. They can act in this capacity for other landlords as well as Soha. We think this is an effective and interesting approach that the sector could explore further.

A number of our members operate Tenant Scrutiny Panels which both they and residents see can be an effective way to oversee the process of complaints. We recommend these are more widely used.

We support the work of the NHF's Offer for Tenants in promoting ways to involve tenants in the process of resolving complaints.

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

We support the role of the Housing Ombudsman in providing an escalation route for residents, but we think this role needs to be better resourced as we know that currently residents are waiting up to 12 months to have their complaint addressed. Many residents are frustrated by the delays they have when their complaint is referred to the Ombudsman. This further erodes their trust in the process, in their landlord and can increase their sense that they are not listened to.

Residents also told us that communication they have from the Ombudsman could be improved and simplified.

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

Our members are constantly working to ensure complaints are dealt with in the quickest time and in the most effective way. But we recognise our current complaints processes can take too long and feel overly bureaucratic. Residents told us "systems landlords put in place seem to be more focused on what matters to them than to tenants." We need to ensure we have a complaints resolution process that focuses on dealing with the cause of the complaint, not the process driven system that currently exists.

Many of our members are exploring how to improve this and are happy to share insights and results with you as reviews progress. Sharing best practice on improving complaints processes will be fundamental to raising standards across the sector and this is something PlaceShapers is committed to doing for our members.

We can do more to involve residents in our complaints processes, and seek to co-design the process with them, learning from sector best practice. SoHa's Tenant's Scrutiny Panel reviewed their complaints process in 2016 and we think measures to engage residents in oversight of landlord's processes and performance should be an integral part of complaints processes.

Rosebury Housing Association recently launched a mystery shopping programme which aims to carry out at least one mystery shopping exercise each quarter to test their frontline customer services. Their shoppers really welcomed being consulted - "thanks for allowing our voices to be heard. It's appreciated" – and agreed with the proposed recommendations to improve the service.

As residents for North Star Housing told us ‘Tenants know what to expect from North Star, mostly because we have been involved in setting customer service standards.’

Some residents feel the Government could go further to help them support complaints processes. They told us “We feel that tenants should be part of the adjudication process with Tenants hearing complaints. To be able to do this there should be national training for tenants to help with looking into complaints – funded by the government so it’s independent of landlords.” We believe this is worth exploring further.

We should also focus on quality and speed of resolution of complaints. For example, some members are exploring if staff can be empowered to resolve simple complaints at first point of contact with the resources available to ensure speedy resolution. South Yorkshire Housing report that they have a three stage process and of the 275 complaints received in 2017/18, 92% were resolved at Stage 1.

Shepherds Bush Housing Association are challenging themselves to look at whether they really need ten days to respond to both stages of their complaints procedure. They are considering empowering staff to take ownership of the complaint to see if they could they get to five day response times in each stage.

Our members recognise we need to improve proactive, simple communication with residents throughout the process. Residents told us “Acknowledgement of complaints at early stage as soon as they come in is important. As is named people handling our complaints with direct contact details.”

We also need to ensure there are different ways to raise complaints. Watford Community Housing offer a wide range of ways for residents to raise complaints with including email, letter, online, face to face and through social media. They are also exploring innovative ways of using digital and electronic media to provide additional choice and interact with residents at specific transactional points so as to identify and resolve concerns as they arise and outside of the formal complaints process.

We can also do more to ensure we learn from our processes – where they succeed and fail. Our ambition is to get it right for every resident and we know that we don’t always achieve our aim, so continually improving our complaints process based on outcomes and on feedback is critical.

These core principles – involving residents, increasing speed of resolution, improving communication, learning from complaints to improve services – should form the core of a charter for Housing Associations in dealing with complaints, and we support the proposals in the NHF’s Offer for Tenants to create this

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

We would support an obligation being put upon landlords (private and social) to respond to resident concerns regarding safety as an urgent issue.

Section three: Empowering residents and strengthening the regulator

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

Our members welcomed, and were part of, the development of the Sector Scorecard and have contributed data to this. The proposed key performance indicators show a positive move to

including wider measures of performance beyond the Scorecard, focusing on our role as the provider of services as well as builders of homes. We are supportive of this.

The indicator looking at responsible neighbourhood management is welcome, but we recommend that this must be measured distinctly and separately from tackling anti-social behaviour. Many of our members are doing hugely positive and proactive things in their neighbourhoods which benefit communities and help tackle stigma. Not differentiating this from any work to reduce anti-social behaviour may enforce misleading stereotypes about social housing and its residents.

Otherwise, our members think these indicators largely cover the key areas. However, they should be developed further based on what residents think are the key indicators for measuring our performance.

We recommend this is twofold. Firstly, that residents are consulted on these key performance indicators (KPIs) that should apply sector wide. Secondly, that additional performance indicators should be developed by each organisation to show how we deliver on our social purpose.

For example, an indicator showing commitments to and progress on helping to reduce homelessness locally would help people currently in temporary accommodation or homeless hostels and support the Government's drive to tackle rough sleeping.

We feel it is very important these additional KPIs looking at social purpose are developed locally, in consultation with staff and residents and agreed by Boards.

We recognise that hard data metrics are crucial for transparency and measuring performance across providers. But these measures alone can never tell the story of the performance of the association, and the service it offers its customers and community.

Setting KPIs locally will allow us to ensure we are measuring what's really important to our residents and communities. It will also allow our members who provide both supported and general housing to show the value of the work they undertake providing support for the most vulnerable households, whilst also developing new homes.

Many of our members already have systems like this in place. At Coastline Housing staff agree with residents what the key performance data is they want to see, and then publish performance regularly so residents can hold them to account.

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

Yes. All housing providers should be required to report performance against agreed core key performance indicators, as determined by the Ministry or Regulator, as well as additional key performance indicators, as agreed by the Board and residents, every year. This should be through our annual reports. This information should also be published on our websites and in our accounts (where relevant).

We believe all social housing providers should be required to undertake this exercise, not just housing associations.

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

We are happy to report on our performance against key indicators to the regulator.

However, for our members the main purpose of undertaking additional reporting on key performance indicators is to enhance our transparency to customers and improve the service they receive.

We believe there should be a requirement as part of a sector charter, as proposed by the NHF's Offer to Tenants, to feedback to residents on our performance every year and a set format to follow. For each of the key performance indicators we are measured on, we should provide commentary to residents. For example, we should be open in providing commentary on the investment choices we have made and why – why we choose to invest more in improving current stock or building new homes or supporting community projects or care and support in our communities. We should also highlight where residents can get involved to help us make improvements.

We should also provide a forum for residents to discuss this report with us, either in person or through digital platforms.

These reports can easily be shared with the Regulator to consider. But we believe the focus for the Regulator's work should be enhanced consumer regulation – see our response to question 29

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

Our members are very concerned that there are some residents who don't feel they trust their landlord. They understand that increasing transparency and improving communication is a key way to rebuild this trust. We recognise that the issues with trust are echoed in a declining public trust in institutions such as politics, media and business. Our members are clear that we want to take this opportunity to really show a step change in how open and responsive we are to residents.

We also need to improve our digital response and how easy and digestible our communications are. Making Board papers available on landlords' websites for example is a good way of showing transparency, but a short summary of the meeting, communicated on Facebook or Twitter, will be far more accessible to most residents. Improving our digital communication will also allow us to reach new and different audiences, including younger people and those who can't or don't wish to attend face to face meetings

We welcome guidance for our Boards to support this. The best mechanism for improving transparency will be different for every organisation, and it's important this is recognised and appreciated.

We also feel it's really important for landlords to be transparent with their residents about the great service they often offer. Publishing stories, quotes, examples in resident communications and on websites will allow us to show the really life changing impact we have, alongside transparency about where we can improve. In response to a consultation on this Green Paper residents fed back to North Star 'North Star are innovative and forward thinking. They go over and above the day job and make our houses homes.'

Rosebury Housing Association have recently published a series of case studies which includes this quote:

"Rosebery actually helped me in my time of need. They supported me in finding me a home. They supported me with my Employment Support Allowance. And they've also supported me with all other benefits relating to being unable to work at the moment, due to an ill health problem."

We need to do more to show and celebrate all the great work we do as well as improving where we can.

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?

Yes. We need to use more accessible information and more communication channels. We need to use social media more – for example we could publish an easy to read scorecard on how we rate on complaint handling on social media platforms.

In addition, we should publish on our web sites annually a statement of what has been learnt through the complaints process and any changes to procedures introduced following complaints, so that tenants and stakeholders can see how we are learning from feedback.

Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?

We already have a mechanism of preparing and monitoring key performance indicators: the Sector Scorecard.

We believe the key performance indicators proposed in this Green Paper should form an expanded Sector Scorecard where data is collected and analysed across the sector, building on what was developed by the sector to successfully inform the new VFM regulatory standard.

Sector Scorecard average and quartile data is currently made available to Housing Associations and the Regulator but not published. We believe this should change with quartile data published annually so our residents can view it.

The sector should continue to hold this data and prepare the key performance indicators. The role for the Regulator should be in proactively working with organisations who score poorly across the key performance indicators.

What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?

From talking to our residents, the key here is in compiling and publishing key performance data in a way that's easy to understand and able to be questioned. Residents are far less interested in comparisons of performance.

South Lakes Homes have piloted a similar initiative, publicising their performance with comparable Housing Associations. Residents weren't interested in the comparison data, they were interested in if they felt their service was good or not.

Shepherds Bush Housing Residents Scrutiny panel had similar views – they cared more about their satisfaction with services and dialogue with Shepherds Bush than they did a comparative league table.

Gateway Housing Residents Scrutiny Panel told us that "Published 'league tables' for Housing Association residents just cement the position of 'bottom of the pile' for those who find themselves living in a property managed by a landlord who is near the bottom of the table. It is made worse by other people being able to see that they do."

West Kent residents were worried that "all your effort would go into the league table rather than improving the service for residents."

South Yorkshire Housing Association residents told us they worried this would “create a tick box culture which often misses the more important and often human stuff.” Their Customer Improvement Panel felt that league tables are “just a show” and too blunt a tool for the job.

Other residents questioned what tenants could use them for – “What’s the point? In most areas you don’t have a “choice” as a potential tenant. It just creates work (and cost) for the landlord.”

We should be driven by what we want these measures to achieve – which is to help us improve our services and make us more accountable to our residents.

We believe asking all social housing providers to publish a report to residents based on their key performance indicators alongside an enhanced Sector Scorecard data is the best way to achieve this.

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?

PlaceShapers members place customer voice and experience of the heart of what they do. Ensuring we are engaging with and, crucially, listening to residents, is core to our business.

We believe many resident engagement and scrutiny measures are very effective. Our members undertake frequent visits to our schemes, meet residents and really know and are known in their local areas. Formal structures operate in the running of organisations such as Residents Scrutiny Panels or Resident Boards.

Many members are trialling more use of digital with social media engagement with residents and Facebook Q&As with senior staff. A number of members have a digital panel of residents who will scrutinise and share opinions using online surveys - both Broadland Housing and Origin Housing have at least 200 residents who engage in this way.

To develop customer engagement further we can be far more creative. Many members have actively promoted a ‘menu of involvement’ that outlines all of the various opportunities they have on offer for our residents to help us run our business effectively. These range from service-based feedback and ad-hoc volunteering right up to the procurement of contracts for key services and membership of the Board. Residents can be skills-mapped to determine where they might add most value to the work and to maximise their chosen contribution for their CV and personal development.

We believe the best examples come when independent resident input is supported whilst also unfettered. For example, Cross Keys Homes’ Resident Board approved the introduction of a new bulky waste collection service recommended by the independent Scrutiny Group. Whilst this service introduced a new chargeable area of service, it was established through wider customer engagement that local area resident views favoured the option of reliable and affordable waste collections.

However we must recognise that this is a very difficult thing to get right – and there is never one right answer. Many tenants do not have the time or the inclination to be actively involved in the governance or scrutiny of their landlords, as often they have busy and complicated lives to lead.

We also recognise that what is often missing is a diversity of voices in these forums. We as a sector need to improve how we engage with customers digitally, and in less formal spaces. There are growing numbers of innovative examples of digital communication but we need to do more to get views from younger and more digitally savvy people who don’t engage in the more traditional face to face forums. We are actively seeking ideas in this area from other sectors to assist in this.

Often the debate about resident engagement focuses on whether tenants are present on Housing Association Boards. For many PlaceShaper members, Boards have reserved seats for tenants but having one or two tenants on Boards is not the answer to resident engagement and scrutiny. This fails to hear a diversity of voices and puts an incredible pressure on the tenant to be 'the voice' of thousands of customers. As a recent report from UK Collaborative Centre for Housing Evidence (CACHE) states "There has been a focus upon representativeness at Board level, particularly among stock transfer HAs, but this approach is only likely to deliver a very thin notion of representation."

Some of our members are moving to skills-based Boards where key skills recruited to are understanding customer service or community knowledge. This welcomes current residents but also sees these as key skills for other Board members.

Recruitment process for Boards should be made available to residents and recruitment process structured so that they advertise to residents and support them to apply. But all Board members should hold the responsibility for delivering a great customer experience, not just a resident representative.

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

Yes. It should be in the form of A Voice for Tenants (AV4T). This should be a fully constituted and funded organisation with clear governance framework and terms of reference. Tenants' expertise is hugely valuable for policy makers, and the value placed on tenant specialists should include a level of recompense, development and support to promote sustainability. Representatives on AV4T should reflect the diversity of social housing tenants in terms of age, ethnicity, gender and region.

We recommend that AV4T also works with us to undertake wide ranging research on resident behaviours and priorities to underpin their ongoing work and ours.

Most residents we asked about this were very supportive of the formation of AV4T but felt strongly that it should not be a substitute for continued, ongoing engagement by landlords, politicians and policy makers with a wider group of residents.

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?

As a network of community-based housing associations, PlaceShapers was pleased to see our offer recognised as a valuable potential alternative for local authority residents. Many of our members were formed as a result of stock transfer and built thousands of new homes communities need alongside developing ground-breaking projects within those communities. Our members are always keen to see how we can do more, and would be interested in exploring further stock transfers.

We would also be very happy to share our experiences of where transfers have been successful with local authorities and residents as Phoenix Housing did with Hammersmith and Fulham residents and staff when they were considering stock transfer.

However, these proposals would need to be fully supported by the local authorities and local communities. For transfers to be successful and sustainable the community should instigate the process and decide on their future landlord.

Stock transfer is one route to building the size and profile of community-based housing associations. There are two other routes we would encourage the Government to consider. The first is in development decisions. Community based associations are often overlooked as a preferred

development partner. Our investment goes beyond homes to provide communities and services with and for our residents, and recognition of this in decisions on funding allocation would be welcome.

The second is on helping to support and facilitate innovative partnerships to deliver homes and strengthen communities. United Communities in Bristol have partnered with the Bristol Community Land Trust, offering development support and guidance so they can develop and build new homes in the city. Support for partnerships such as these already in train – through access to land or investment options – would help support more community-based housing initiatives.

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

We think there is merit in a programme of trailblazers. We believe this could inform and influence the sector on the take-up of alternative governance methods and constitutional approaches.

Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?

Many of our members have mutual models of ownership. We would welcome the opportunity to discuss the value of a place-shaping approach to housing, including having locally based decision making, leadership and investment.

European models of community owned or managed housing are known to offer successful models with fairer and more democratic processes in terms of governance, stock investment, management and development. There are lessons here we could learn from.

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

Strengthening choice over services would certainly be welcomed by many residents and help empower them to make choices that shape the community they want to live in. However, such proposals need to be realistic.

Choice of contractor is complex. Trust, commitment and inclusion are high on the list of resident aspirations when they agree to volunteer work with landlords. Working on contractor services requires intensive engagement and requires longer term commitment and experience is invaluable.

Resident involvement in key procurement panels is something many of our members do. Many also involve residents in setting service standards and helping to monitor performance.

Wandle Housing has a managed service provider contract for repairs, where they utilise contractors large supply chain and list of suppliers. They involved residents throughout this procurement process in order to ensure they designed a repairs system that works for residents. However they are clear it would be “near impossible” within this structure to allow residents a choice over which subcontractor was used for certain repairs, due to the nature of the contract.

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

Our members recognise that there is more they can do to engage with leaseholders. Leaseholders of social housing landlords are often the least satisfied customer group and proportionately the fastest growing one

Our members are currently debating this question and would welcome sharing their ideas with you. Our current ideas include:

- More effectively engaging with leaseholders, including improving pre-purchase practice to ensure a fuller understanding of this tenure
- Improving standardisation/accessibility of pre-sale and post-sale information
- Offering new engagement models, which incorporates out of hours appointments and online surveys, giving leaseholders a voice for the services they may wish to see within their communities and assistance with understanding the obligations of their lease.
- Offering better defects and after sales services
- Providing easier staircasing options
- Developing ways for leaseholders be able to pay any communal planned and cyclical maintenance bills and clarify how they pay for communal repairs

We believe there could be a role for Government to introduce some leasehold standards that we can be measured against and apply the same principles on performance, compliance and quality. We would be happy to discuss this with you further.

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?

We welcome the focus on enhancing consumer regulation in the Green Paper, and so do many of our residents. Our member South Lakes Housing reported back from their Resident Scrutiny Panel “Our tenants have never understood why the regulator is not interested in consumer standards.”

We support the current consumer standards. We recommend the Regulator takes a more proactive approach to consumer regulation and is sufficiently funded to do so.

We also recommend the Regulator develops a stronger mechanism to measure consumer standards and specifically overall customer experience.

The Regulator currently has a mechanism to measure our overall performance on governance and viability. We believe it must also have a mechanism for measuring the overall quality of service we are offering residents. We recognise this has been tried in various forms in the past and we do not advocate a return to some of the more paternalistic approach to regulation we have seen in the past. But we do believe active consumer regulation could take place in the same way that active governance and financial viability regulation does now.

We also recognise that this must be forward looking. Any regulatory measure on customer experience must involve consultation with residents, and this should be done in a variety of ways.

We are discussing with our members a number of mechanisms for enhanced consumer regulation. We would be very happy to work with you and with our members to test and collect further views on these options.

1. An enhanced ‘G’ standard - the ‘G’ grading (and IDA visits) should proactively focus on the governance arrangements for customer experience. An extension of the Governance rating would include consideration of how well an organisation deals with transparency and

accountability and feedback from residents about the overall service they receive. This could be supported by a reintroduction setting out expectations in this area in the code of governance

2. A new 'C' standard - a 'C' category rating that ranks customer service alongside governance and viability. The 'C' would build on the existing Tenant Involvement and Empowerment Standard. If a Housing Association was given a C3 or C4 rating it should automatically trigger a downgrading of their governance rating. This would ensure the importance placed on customer service and resident engagement was weighed more equally with economic standards of governance and with C3 or C4 ratings.
3. A Trip Adviser style rating for residents to give their landlords. This could be underpinned by real time satisfaction data based around one key metric of "would you recommend XXXX as a landlord to friends and family".

We also recommend the regulator develops a list of experts in resident engagement who can be brought in to support Boards who need to improve in this area. There should also be stronger enforcement penalties for failing to meet the consumer standard – see question 34.

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?

We do not see a need to change the Consumer Standards at the current time, but we do believe more proactive regulation of these standards is key, along with a focus on the overall customer experience of landlords.

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?

The Regulator should be more proactive in consumer regulation and in particular in taking action where consumer standards are not adequately met. It is key that Housing Association Boards interpret standards and ensure we are delivering accordingly.

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?

Yes – the Regulator should certainly use appropriate key performance indicators to identify landlords where they need active engagement to establish and clarify compliance with standards.

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

Yes. There should be a standard approach across all housing providers. Local authority landlords should ideally be regulated by the same regulator to the same regulatory standards.

We also believe tenants of Private Rented Sector landlords, especially where the landlord is providing housing which meets a homelessness duty, should expect the same standards as a social housing sector tenants and these landlords should be regulated accordingly.

Are the existing enforcement measures set out above adequate? If not, what additional enforcement powers should be considered?

When we discussed these ideas with residents a common reply was around penalties. Residents were supportive of increasing consumer regulation but questioned what would happen to landlords

who were failing or in need of improvements in this area. As many residents pointed out, they don't have 'choice' to move to a different landlord.

It was generally felt that if regulation was to go further there would have to be some penalty for failing to provide a good service. Residents told us "We think that landlords with poor services should be downgraded. Downgraded based on customer satisfaction."

Merger type 'rescues' are used when financial viability is severely threatened. We believe it is worth considering if these could be extended to situations where customer service is failing. Another suggestion made by residents was that another landlord would take over the management of some stock if customer service was found to be failing. We believe these ideas have merit and deserve further consideration by the Ministry and the Regulator.

Section 4: Stigma and supply

37. How could we support or deliver a best neighbourhood competition?

Initiatives to celebrate community and 'place', bringing people together in different ways are important. Residents have told us they like the idea of community events that bring together home owners and social tenants where they had an opportunity *"to mix, talk to each other and get rid of any stigma that way."* Residents were far less supportive of such initiatives if they were just focused on social housing tenants.

We do not believe that a national 'best neighbourhood' competition would be effective in tackling stigma or celebrating thriving communities. We believe that such initiatives are best shaped and delivered locally with the engagement of an individual landlord's tenants – and indeed such events already take place all over the country. The best support Government could offer would be to offer small grants for such events, to attend them and speak positively of them.

In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?

It is very welcome to see the theme of tackling stigma running through this Green Paper. But it is also important to understand the step change in ambition that will be required if we are to effectively reduce or end the stigmatising of people living in social housing. We need to stop stigmatising from happening, rather than think about ways to tackle it.

Members also report that there is not one stigma – there are many views held by different people, from those who live in social housing to those who are frustrated that they can't access it to those making often misinformed judgements about who social housing residents are. There runs through our national dialogue a notion of people being 'deserving' and 'undeserving' and we must stop this characterisation if stigma is to be tackled.

A number of our members reported that their residents have experienced stigmatisation. 95% of the 125 people who responded to a survey from Coastline Housing said they had. One woman said "I'm a single parent and work bloody hard to provide for my daughter..... yet being in social housing I often get the surprised look of 'OH! You have a job.' Yes I work! Just because I'm in social housing does not mean I live off benefits."

However, we must also recognise that some of our residents said they do not feel stigmatised, that they feel part of strong communities and actually felt patronised when being asked about this.

We strongly recommend that tackling stigma needs to reach the general public as well as those in positions of power and influence who shape our culture, society and politics. Residents told us “this is for the Government and the media to do, not you as landlords.” We recommend the Government establishes a cross party commission, also including tenants and housing association representatives, to explore the main drivers of stigmatisation and make recommendations to Parliament and other sectors to stop it.

Campaigns to influence and change public perceptions are vital – as the Green Paper recognises in its support for the 'See the Person' campaign. This is an excellent example where housing association staff and residents have worked together to develop a very ambitious and already impactful campaign. It needs support and investment so that it can achieve its aims. Successful campaigns like Mind's Time to Change show what can be achieved if campaigns to change our attitudes are well developed and well-funded. We recommend the Government helps to facilitate meetings with funders such as the Big Lottery and Comic Relief to support campaigns like 'See the Person'

The 'See the Person' campaign has a guide to reporting on social housing written by people living in social housing. We recommend the Government convene a summit of senior journalists, editors, news producers and commissioners with social housing tenants and landlords so media professionals can see realities of social housing residents' homes and lives and discuss how to best communicate with their audiences to reduce the stigma many face.

Ministers have also said publicly that some politicians have a negative view of social housing and its tenants. Our members take seriously their role in changing this: in building relationships with their MPs and Councillors, responding to their queries and concerns but also showing them the realities of the fantastic homes they are building and the inspiring stories of people who live in them.

But we also think there is more the Government can do to help change these negative perceptions. It should consider rolling out a basic 'social housing awareness training' to all newly elected MPs – based on this 'poverty training' by the Poverty Alliance in Scotland
https://www.povertyalliance.org/what_we_do/training

We also believe we as a society has to rethink the emphasis we place on home ownership. Residents told us “the constant government message that home ownership is aspirational feeds stigma.” There is a stigma attached to being in social housing, or indeed private rented housing beyond a certain age. We recommend that government consider the extent to which their own use of language, including in this Green Paper, perpetuates the assumption that home ownership should be the goal for all. There are many large groups of people who will never be able to buy in a low wage/high housing cost economy. Social housing should therefore be presented as a positive long term tenure of choice.

In the long term, tackling stigma goes hand in hand with increasing the supply of social housing. We need social housing to be seen more widely as a tenure of choice, and available to more people, if we are to really change attitudes about its role in society. Some of the stigma comes from the fact that now only a very narrow, vulnerable group of people in society can access social housing, as opposed to a much wider group in the past. We recommend that Government recognise that given the extent of housing need there is a need for housing association tenure to become a mainstream tenure of choice again, which will both reduce stigma and meet broader housing need. We recommend that government open a dialogue with the sector about how to achieve this goal

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?

There are a huge number of programmes and initiatives that show the wider work that landlords do beyond building and maintaining homes. For our members, this work is core to their responsibility as a social landlord, not additional. PlaceShapers brand reflects this: “We Build, We Work, We Care, We Share.”

PlaceShapers’ current We Care campaign profiles just a snapshot of the amazing work our members are doing – our campaign report is here <http://placeshaperswecare.max-mediagroup.co.uk/we-care-report/we-care-cover-option/> We would welcome support from the Government in promoting and championing these stories.

Similarly, our We Build report tells the **inspirational stories of 15 people who’ve built careers and new lives with help from PlaceShapers members**. They are typical of more than 60,000 stories of people who PlaceShapers have helped gain the skills, qualifications and confidence to find work since 2010. <https://www.placeshapers.org/we-work/>

We believe landlords should report on how they achieve their social purpose through locally developed KPIs, developed in consultation with residents (see answers in section 3)

Social value is more challenging to measure. If landlords were to do this we would need to ensure we had a common and thorough measure. We would need to invest in baseline survey data, share learning about successful interventions, be prepared to say when things don’t work. To represent value for money this would need to be shared across the sector.

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

Our members have a range of partnerships to help prevent and tackle anti-social behaviour, with strong relationships with local police forces.

At Coastline housing ‘neighbourhood walkabouts’ are organised with local crime partners, politicians and the local authority. On a rolling basis, and particularly if they get feedback through surveys that certain areas seem to have more problems, a team of staff from across the businesses, and other partners, spend a day door knocking across an area to get feedback on how things are and what we could do to improve.

Broadland Housing recently took over management of a scheme in a rural area. It had previously been a little neglected and gained a reputation for drug use and low-level ASB. Working closely with the local police force, they set up quarterly visits to maintain a visible presence. They have established partnership events where the Police, Floating Support, Drug and Alcohol support and our repairs operatives have carried out community planting along with local residents. Feedback from residents has been very positive.

Section 5: Ownership options

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.

We warmly welcome the clear vision from Government that building new social and affordable housing is at the heart of tackling the housing crisis and central to the Government's supply ambitions.

Research for the National Housing 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.¹

The Prime Minister's announcements since the launch of the Green Paper, and measures the Government has 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 available more cheaply and easily 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 our members 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.

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?

All of our members agree that they could develop significantly more affordable housing if they had long term certainty over funding. The Government's recent announcement of £2bn in grant for 2021/22 – 2028/29 sets an important and welcome precedent for longer term funding beyond the spending review period.

We would like the Government to even more ambitious and set out a broader housing investment strategy for this period which would help enormously in tackling the housing crisis facing this country.

The housing investment strategy must look at grant rates but also at land availability and land value. In many high value areas of the country there is a huge deficit between grant and rental stream income and the cost of developing due to the land costs. Yet in other areas whose economic futures are uncertain, where employment opportunities are weak and land almost valueless, properties cost more to build than their value when the last brick is laid.

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

Many of our members provide shared ownership products. These homes offer the only route to home ownership for some residents. Offering shared ownership for those who can afford it also allows us to free up affordable and social rent properties for people on housing waiting lists.

However, it's vital that shared ownership housing should be provided, as well as, but not instead of, affordable and social rented homes.

¹ <https://www.housing.org.uk/press/press-releases/england-short-of-four-million-homes/>

The key challenge we need to solve is how to staircase at flexible levels and to do it in an affordable way. If you buy a £150,000 house at 25% shared ownership then a further stake at 10% is £15,000. It's more likely that people could grow their stake incrementally by adding 1/2/3% a year but the legal costs of doing that would be prohibitive. Government should work with lenders and the sector to develop a flexible arrangement where people can staircase incrementally upwards at relatively little cost. That way people can see their stake increasing and their rent decreasing and will enhance their own chances of moving up the property ladder.

We also would welcome support for delivering shared ownership homes in low value areas. It is challenging to develop viable shared ownership schemes in these areas which are generally the more deprived communities where tenure diversification could add value. Cost over Value Grant could be reintroduced to assist with this viability deficit.

And whilst shared ownership is very welcome, for many people, home ownership is not the tenure they aspire to. Many of our residents have no aspirations of ownership and are proud to live in social housing. They told us "Please focus on secure and decent homes for people and stop putting pressure to own. Renting is a viable and sensible option for some." This must also be recognised, in policy but also in our language, to tackle stigma and to ensure we proudly deliver significantly more social rented units alongside shared ownership.