



PlaceShapers

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PlaceShapers response to consumer standards consultation

Introduction

This response to the consultation on the new consumer standards is on behalf of PlaceShapers, the national network of place-based housing organisations. The social housing sector is diverse. Providers differ based on their size, the profile of their homes, their geographical focus, social missions, and operating models.

PlaceShapers have over 100 members – ranging from small housing associations with less than 1,000 homes to large housing associations with over 40,000 homes. Our members operate locally, focused on helping residents and communities thrive. They are not-for-profit businesses committed to improving places through long-term social, economic and physical regeneration.

Our response to the consultation has been informed by conversations with, and input from, our housing association members and their residents. This includes feedback received from residents in three events we hosted in partnership with our members and the Regulator.

We welcome the open and constructive way the Regulator has engaged with our members and residents through the course of the consultation period, including through our webinars and networks.

Summary

- We are supportive of the overall approach, standards and outcomes set out in the new proposed consumer standards. We welcome the continuity with the previous standards but agree that the standards have been strengthened, enhanced and clarified where necessary.
- We think the standards set out important measures that will help improve accountability to residents. This was reflected in the feedback we heard from residents, who were very supportive of the standards and there being clear and ambitious expectations on their landlords. Residents we spoke to said the standards broadly set out what they expect their landlord to be delivering.
- We welcome the focus on outcomes and the continuing commitment to co-regulation.
- We agree that the standards should not be too prescriptive, and it is important that the outcomes can be met in different ways depending on the context and priorities of each organisation. We think the Code of Practice is helpful in this respect.
- A number of the specific expectations set out in the standards rely on partnership working with other agencies and the social housing landlord may not be completely in control of the outcomes delivered. We think it is important the Regulator is explicit about how they will approach the assessment of these standards in practice and set out a broader range of examples of how expectations can be met where relevant.
- While not part of this consultation, we believe the way the standards are regulated will be critical and it is important that local context is central to the process. We would welcome the opportunity to engage with the Regulator as the inspection process is developed.



- We think it would be helpful if the Regulator is open to providing further clarification on the standards and expectations, including through updates to the Code of Practice, as we learn from the first round of inspections.

1. Overall, do you agree that the proposed Safety and Quality Standard sets the right expectations of landlords, as set out in Chapter 6 of the consultation document?

- Yes, we agree that overall, the proposed standard sets the right expectations of landlords.
- We support the specific expectations on stock quality but believe it is important that local context and condition and understanding of homes should be considered when this is looked at in practice.
- On stock quality, we feel the Code of Practice might benefit by being more explicit on what the Regulator consider a physical assessment of a property to involve, or the level of expertise required by the individual completing the assessment.
- There is still detail to be confirmed that will affect the specific expectations under the Safety and Quality Standard, in particular on the stock quality outcome, for example on the new Decent Homes Standard and Awab's Law. We would urge the Regulator to review whether further information or clarity is required once all of this detail is available.
- We also feel the health and safety outcome would benefit from having a clear definition of health and safety and make a clear distinction between building safety and a resident's personal safety (or safety in their neighbourhood).

2. Overall, do you agree that the proposed Transparency, Influence and Accountability Standard sets the right expectations of landlords, as set out in Chapter 7 of the consultation document?

- Yes, we agree that overall, the proposed standard sets the right expectations of landlords.
- The residents we spoke to also clearly signalled their support for this standard and thought it would improve the accountability of social housing landlords to their residents and meeting these expectations would improve the overall experience for residents.

3. Do you agree that the proposed Transparency, Influence and Accountability Standard accurately reflects the government's 'tenant involvement' direction to the regulator?

- Yes. The standard clearly sets out expectations of providers and is simple to follow. It is drafted in a way that allows social housing landlords to set out clearly how they meet each aspect of the standard.
- We think it is helpful that the Tenant Satisfaction Measures Standard has been included in this overarching standard.



4. Overall, do you agree that the proposed Neighbourhood and Community Standard sets the right expectations of landlords, as set out in Chapter 8 of the consultation document?

- Yes, we agree that overall, the proposed standard sets the right expectations of landlords.
- We welcome the focus on domestic abuse and the expectations this places on social housing landlords.
- The residents we spoke to welcome the emphasis on shared spaces and safer neighbourhoods and what could be delivered with strong partnership working. However, residents had different interpretations of what was meant by ‘contributing to up the upkeep and safety of shared spaces’ described in the required outcomes for this standard and whether there was an expectation that their landlord should be contributing financially. We think it would be helpful to take out the reference to ‘contribute’ or clarify its meaning to avoid any potential confusion.
- Residents shared examples of how their housing association had transformed some communities by working with the police and local authorities and said they thought we should expect all housing associations to play this role where possible.
- Meeting many of the outcomes and specific expectations in this standard depend on partnership working with other agencies, in particular on shared spaces and safer neighbourhoods. We support this principle and welcome the acknowledgement in the Code of Practice that, for example, the maintenance of shared spaces is not the responsibility of registered providers. However, we think it is important the Regulator is realistic about what success looks like and keeps the Code of Practice under review as it sees more examples of how social housing landlords are seeking to evidence their delivery of the outcomes under this standard.
- We also think it would be helpful if the Regulator engages with the relevant third parties to better understand and reflect what they reasonably expect from the housing associations they work with.

5. Overall, do you agree that the proposed Tenancy Standard sets the right expectations of landlords, as set out in Chapter 9 of the consultation document?

- Yes, we agree that overall, the proposed standard sets the right expectations of landlords.
- We think the standard sets out sensible expectations and we are glad to see that it has simplified the expectations without significantly diverging from the general expectations of the existing Tenancy Standard.
- The residents we spoke to suggested that it would be useful for the Regulator to set out clearer expectations on the quality of the information they expect social housing landlords to provide for new tenants and tenancies under the outcome on tenancy sustainment.
- We support the expectation that social housing landlords should develop services to address overcrowding and under-occupation, as set out under the allocations and lettings outcome. However, again we would urge the Regulator to be realistic about what some landlords may be able to achieve in practice. For example, many of our members were created by the transfer of homes from local authorities and still offer 100% of their nominations to the local authority. We



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think it would be useful for the Code of Practice to set out some examples of how this outcome could be delivered in different circumstances.

7. The proposed Code of Practice is designed to help landlords understand how they can meet the requirements of the standards.

Do you agree that the proposed Code of Practice meets this aim?

- Yes, we think the Code of Practice provides some helpful examples of how social housing landlords can meet the outcomes and expectations set out in the new proposed consumer standard. There are some areas where we think the code could provide further clarity and examples that reflect different circumstances, for example on shared spaces, safer neighbourhoods, and allocations and lettings.
- We would urge the Regulator to update the Code of Practice to reflect early examples of evidence presented by social housing landlords that successfully demonstrate compliance with the new standards.