

The Social Housing Green Paper A New Deal for Social Housing

NFA response
6th November 2018

Introduction

The NFA represents 32 ALMOs which manage over 440,000 council homes across 35 local authorities stretching from Cornwall to Newcastle. We very much welcome the opportunity to respond to the Social Housing Green Paper; A New Deal for Social Housing and we completely support the Government's aim to create a sector that "we could all be proud of whether we lived in it or not" which chimes with our members' core values to:

- ***aspire to provide excellent value for money and customer-led services for residents in partnership with local councils***
and
- ***develop innovation and continuous improvement in providing, managing and maintaining affordable homes in sustainable neighbourhoods***

There is much to be welcomed within the Social Housing Green Paper, including several key announcements on areas where the NFA has been lobbying on for the last few years:

- Confirmation that the Government will not introduce the High Value Asset Levy, and a commitment to repeal the legislation;
- Recognition around the problems with Right to Buy, and a consultation to address sector concerns;
- Confirmation that arrangements for Fixed Term Tenancies will be kept at a local level at this time, with the provisions of the Housing and Planning Act not enacted.

However, the NFA feels it does not go far enough in some areas and by defining social housing as just a safety net and/or a springboard into homeownership it contributes to the stigma about social housing which we have been fighting. The NFA would like to see a social housing sector that plays a full part in a mixed tenure housing market and provides decent, good quality homes for all in neighbourhoods residents can be proud of.

A New Deal for Social Housing is organised around five themes:

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

Questions

Ensuring homes are safe and decent

The NFA welcomes the work being undertaken by the Government in response to the 'Independent Review of Building Regulations and Fire Safety'.

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

We welcome the approach in one of Dame Judith's recommendations that residents should be proactively given information about building safety and residents should have the right to access detailed safety information, such as fire risk assessments. Many ALMOs are already doing this, particularly with residents in high rise blocks and we feel some of our members have some good practice to share in this area.

Nottingham City Homes (NCH) for example has done a lot of communication work with residents regarding Fire Safety from immediately after the Grenfell tragedy which is now an ongoing matter. Throughout the year they have held safety events at each of their high-rise blocks, with the final event scheduled for early December. In most editions of their resident newsletter they have included information around Fire Safety. They also have information on their website, including a couple of short films they've produced about the sprinkler installation work they are carrying out, which you can read here: <https://www.nottinghamcityhomes.org.uk/your-neighbourhood/around-your-home/safety/fire-safety-enhancement-works/>

Northwards Housing has been running a "High-Rise Living Forum" for nearly 10 years which is open to all residents of their 20 tower blocks. They have a core of representatives from residents' groups in single or groups of blocks. The purpose of the forum is to get feedback from residents on how well they manage & maintain blocks. They use it to test new ideas or proposed changes to management arrangements- such as new waste recycling arrangements in tower blocks & retirement schemes. Since Grenfell Fire there has been a focus on fire safety. They also produced specific High-Rise Fire Safety Newsletters, delivered to all residents in towers explaining their response to Grenfell. They have also been pro-active in using social media to both respond to comments and concerns from residents as well as promoting the general messages from Northwards Housing.

Tower Hamlets Homes (THH) have been working closely with the council, residents, staff and the fire service. To give residents an opportunity to influence and challenge the THH approach, they have been:

- Attending as many Tenants and Residents Association and public meetings as possible to discuss the approach and answer any questions and concerns.
- Working with a group of TRA representatives from other Housing Associations in the Borough to share good practice and promote the use of their 'fire safety charter' across the Borough.
- Setting up a Fire Safety Working Group for residents.
- Organised joint training sessions with the fire service for TRA representatives and Councillors.

Examples of influence resulting from their resident voices approach are:

- Prioritising face to face contact to higher rise blocks
- Prioritising works programmes to blocks with single internal staircases
- Decision of Mayor to publish all Fire Risk Assessments
- Changes to liaison arrangements for major works following feedback.
- Resident review of draft letters to ensure it responds to residents' concerns.

THH has a vast array of communications with residents on these issues including:

- Identification on website of 'what safe looks like' in relation to fire and smoke detectors, flat front door specifications, common areas, grills over doors etc.
- Explicitly advising residents on how to play their part.
- Fire safety information as part of the new resident sign-up process.
- Published all redacted Fire Risk Assessments along with how to interpret the findings and actions contained within them.
- Issued general letters to all residents following Grenfell and individual block ones specifically for high rise blocks and created a Fire Safety Special edition of their resident Magazine Open Door which was delivered to all residents.
- Produced three fire safety videos, professionally made: "safety at home", "what to do if there's a fire in your home", "what to do if there's a fire in your block" for the website which are in English, Somali and Bangla.
- Issued communications over social media on the key issues.

They have also established a Neighbourhood Services Fire Safety Team prioritising blocks 6 storeys and above. The team have the intention to visit and gain entry to all flats and look at communal areas. So far the results of the 2,668 visits since January 2018 include:

- Communal areas in 67 blocks being cleared
- Identification of 277 vulnerable residents and 27 residents with hoarding tendencies
- Identification of 11 suspected sublet properties now under investigation
- The return of 3 properties to the council following interviews under caution by the fraud team
- The identification of 32 Air B&B's & 93 HMO's which have been referred to the council to check if licences are in place.
- The identification of 236 private balconies storing combustible items
- The referral of 234 leaseholders to the LFB to fit smoke detectors and
- 190 repair works ordered for faulty or missing smoke alarms to be fitted in tenanted properties.

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

Yes – there should be no difference between the sectors.

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

Although very much welcomed and a significant improvement on the previous situation for council housing, the Decent Homes Standard was taken very much as a minimum standard by most ALMOs back in 2002 when they started to receive funding and implement their programmes. An assessment of the Decent Homes Programme by Sheffield Hallam University in 2010 said that most respondents to their survey “felt the DHS was too low, it focused too narrowly on the physical condition of individual properties (to the detriment of other considerations, energy efficiency or security); it did not adequately address the upkeep of common areas and parts (many of which carry high on-going maintenance costs, which exceed the funding available); and it did not encompass other improvements which may be vital to longer-term neighbourhood sustainability, including enhancements to local environments and facilities, reductions in anti-social behaviour, and the potential for the diversification of stock and tenure.”

ALMOs worked closely with tenants to plan their DHS programmes and many found that it did not meet the needs and expectations of tenants either around concerns for security (of themselves and their properties), the overall appearance of their neighbourhood, and for energy efficiency standards. Therefore, many of our members adopted ‘Decent Homes plus +’ standards when setting their improvement programmes (see examples below). These were tailored to local circumstances and resident priorities.

Stockport Homes delivers a self-styled ‘Stockport Homes Standard’ which is the Decent Homes Standard plus other items such as: the provision of showers; floor and wall tiling; full decoration; smoke alarms; secure-by-design doors; double glazed windows; bathroom insulation; and where possible, a choice of components for items such as floor and wall tiles, bath panels, toilet seats, worktops and taps.

Northampton Homes operates a ‘Northampton Standard’ which includes a requirement to upgrade environmental areas, to provide showers over every bath and security lighting to all homes.

Shropshire Towns & Rural Housing (STAR) install carbon monoxide detectors, heat detectors, showers in bathroom replacements. They have also increased the depth of loft insulation where gas central heating is fitted to 300mm rather than the Decent Homes standard of 50mm. At change of tenancy when the property requires both a kitchen and bathroom upgrade, they do both.

Newark & Sherwood Homes and Newark & Sherwood District Council adopted the Newark and Sherwood Standard which includes the following additions: double glazed windows, 'A' rated efficient boilers, a reduced life cycle replacement for kitchens and bathrooms. The current lifecycles prescribed in the Decent Homes Standard are felt to be too long, since they would often lead to earlier replacement due to Housing Health and Safety Rating system issues (e.g. hygienic work surfaces).

Six Town Housing include a range of additional items as part of a decent homes improvement project including: mechanical ventilation in bathroom and kitchen; LED lighting in bathroom and kitchen; floor coverings in bathroom and kitchen; additional electric sockets in kitchen; shorter replacement cycles for kitchens and bathrooms; loft insulation on all re-roofing schemes; replacement of timber fascia, soffits and barge boards with UPVC on re-roofing projects; shower mixer taps with bath replacements; mains smoke and heat detectors; outside security light; decoration or decoration vouchers; structural remodelling of kitchens and bathrooms; incorporating disabled adaptations (primarily level access showers instead of replacing the bath).

Homes for Haringey now operates to a new stock investment standard, which includes the following:

- All stock survey items – maintaining the whole asset including the common parts
- Structural repairs
- Fire Safety
- Estate improvements
- New areas such as soil vent and water supply works
- All items affecting decency

Poole Borough Council introduced an enhanced Decent Homes Standard because it was the most cost-effective manner to deliver the maintenance programme. This standard ensured that homes were only considered decent if they had both a kitchen and a bathroom which was fit for purpose and looked at the replacement rates for component parts. The point was to require initial investment as part of the DH programme to deliver longer replacement times, leading to lower response repair requirements and replacement costs.

Nottingham City Council adopted Nottingham City Homes Plus Standard at the beginning of their Decent Homes work which was considerably more detailed and defined than the Decent Homes Standard. The enhanced standard incorporated Lifetime Homes considerations, and Energy Efficiency and Secured by Design measures.

This does seem to be a good time to review the DHS and to take on board some of the common themes adopted by our members and others across the country. We believe that improved energy efficiency and increased use of renewable energy should be set as a minimum standard and would support the Government's proposal to update the standard to consider the outcome of the Government's consultation on 'The Clean Growth Strategy' on whether the energy performance of social homes should be upgraded to Energy Performance Certificate Band C by 2030 where practical, cost effective and affordable. However, we would also like to see them include an element of looking to the longer term 2050 goal of low to zero-carbon and how property owners might get their properties to that goal over time.

There is often a conflict between measures that might be quick and fairly cheap in the short term to improve energy efficiency slightly and deeper retrofit measures which may be required to meet the longer-term goals of reducing our carbon emissions as a country. Some of the interim measures can actually make it harder to complete a full retrofit and some are just not good value for money if the aim is to bring the property up to low or zero-carbon eventually. It would be good for property owners to understand the options and the value for money over certain time periods especially when considering major work or refurbishment projects.

We also support a review being taken to include wider elements of the estate or neighbourhood including the garden/grounds, communal areas and overall estate environment, and the link to 'decent neighbourhoods'. However, these elements are often best agreed upon at a local level so it is important for social housing landlords to have local discretion over stock management and investment programmes, with decisions taken around local priorities and concerns.

However, if there are to be improvements to the Decent Homes Standard councils and ALMOs will need more resources in order to be able to implement them at a time when there is nothing further to cut from elsewhere due to the recent effects of continued efficiency savings over the years plus the impact of 4 years of rent reductions.

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

Some of our members have also proposed the following changes to the Decent Homes Standard to help ensure social homes are safe and decent:

- Health and Safety compliance in terms of statutory inspections and testing being part of the standard requirements, including:
 - Asbestos
 - Legionella
 - Electrical testing
 - Gas safety
 - Fire safety (including whether a home has a valid fire risk assessment/ fire safety certificate/ hard wired smoke and CO alarms)

- Dampness/condensation prevention
- Integrating recommendations arising from the Hackitt Review, Building a Safer Future: Independent Review of Building Regulations and Fire Safety;
- A review of the design standards of doors and windows

The NFA would also like to see leasehold issues be considered in terms of delivering safe blocks of flats and this opportunity used to set out rights for freeholders to enforce health and safety issues such as fire doors, gas safety checks and electrical testing as well as improving the rules on subletting.

However, it is also important to recognise that Council HRA self-financing deals were worked out and agreed on the basis of the original, fairly minimal, DHS. Since then we have had increased rates of RtB, reduced rents for 4 years and, for some, increased costs of fire safety works post Grenfell, so any significant increases to the standard will need to be costed and funded either through additional resources from government, increased rents or decreased funding on other services or new build otherwise it is likely to be unachievable and have a detrimental effect on resources for management and maintenance in the short and long term.

Effective resolution of complaints

The NFA is fully supportive of the Government's desire to give residents a stronger voice to influence decisions and challenge their landlord to improve performance. This is something that has been part of ALMOs' DNA since their inception and all of our members are still deeply committed to it. The NFA has gathered feedback from our members and from tenants to shape our responses to this section and there is considerable good practice within the ALMO sector around effective complaints management.

As a matter of course our members work closely with their residents to ensure that complaints policies and procedures are effective. All ALMOs have tenants on their boards, with residents contributing to a range of engagement activities, including scrutiny panels, area panels, service improvement panels, consultations, estate walkabouts, quality assurance advisors and Tenant and Resident Associations. A summary of this work can be found in the NFA Briefing [Every Voice Counts](#) (2018). This is a defining feature of the ALMO model.

As part of the preparations for their Green Paper responses, many tenants have fed back to our members that they are happy with how complaints are managed with their landlords. Whilst we agree that poor practice and performance within the sector should be tackled, we are also keen to ensure that best practice is recognised and shared, and those organisations who already operate effectively in this area should be able to continue to do so. The key is ensuring that residents' voices are heard.

Linked to this, we think it is important that organisations should be able to develop local complaints policies, procedures and practices which are co-designed with their residents/tenants. What should be measured is the outcome not the process.

Within our responses to these questions, we have highlighted areas that the Regulator could look at to ensure that organisations are effectively responding to complaints. Whilst KPIs are useful, they would not give the Regulator the whole picture. Effective complaints management is about having a culture throughout an organisation where complaints are encouraged, resolved effectively and learnt from. For this reason we think that organisations should provide sufficient assurance to the Regulator that this culture is in place, with the Regulator taking a risk based approach to reviewing this and using inspections as an essential part of that review when deemed necessary.

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

We have heard good and bad reports about how mediation works locally, and for this reason, think MHCLG needs to do more research to understand how it currently works, and identify good practice. We also need to ensure that landlords have an effective means of dealing with vexatious complaints.

Strengthening the mediation opportunities should not add an extra layer to the process and if required should be funded by Government. Other options which could be explored include:

- Considering whether regional tenant panels could be set up with members from across all social housing providers in an area, these could then provide mediation;
- Appointing a manager independent to the service area where the complaint lies to review the case;
- Developing a network of mentors to support complainants through the process (although this would require sufficient resourcing)
- Partner providers in an area to provide an independent view
- The Government could consider funding an independent organisation (e.g. Shelter/ CAB) to act as a mediation service via the Ombudsman.

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

The NFA believes the Government should remove the democratic filter stage completely as in many places it has not been helping tenants or leaseholders get their complaints resolved. However, in some places it appears to work well and taking it away will remove the current option for a tenant panel to be the 'democratic filter', which enables complaints to be resolved at the local level through peer review. In these situations we would like to see the approach of using tenants' panels facilitated in a different way.

This will, however, mean that the Housing Ombudsman needs better resourcing since it is likely more residents will approach the Ombudsman and we are aware of lengthy delays in resolving cases already. As part of any suite of measures around complaints, it would be good to measure the number of complaints which are going to the Ombudsman, how

many are upheld, and the reasons they are not being resolved locally. This, of course, needs to be understood alongside the efficacy of landlord communications to residents about the existence of the Ombudsman, since low referrals could be because the landlord's complaints processes are effective or alternatively because they are not telling tenants or leaseholders about the Ombudsman.

Case Study – Newark & Sherwood Homes

Newark & Sherwood Homes has a Tenant Panel as the democratic filter. This has worked particularly well for them, serving to speed up the overall process. If a tenant remains dissatisfied at the end of the complaints process, they are informed of the right to refer their complaint to the relevant ombudsman service and provided with the necessary details. During any part of the complaints process, Newark and Sherwood Homes welcomes the involvement of a local Councillor or Member of Parliament as a democratic filter to act on behalf of the complainant. This speeds up the process and negates the need for the 8 week wait.

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

A number of ALMOs have a tenants' panel which fulfil the role of 'designated person' in the complaints process. This provides complainants with a peer panel to review their complaints and appears to work well in many areas. However, for tenants who sit on panels, there is a considerable time commitment and need for a certain skillset. It would be worth considering whether the Government could work with an external agency, such as TPAS or Citizens' Advice, to develop training programmes to support these tenants' panels.

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

Every social landlord should have a complaints policy and procedure in place which clearly states the complaints' process and how the organisation communicates that process to residents. The policy and procedure should be logical, easy to understand, and make use of all opportunities (both verbally and in writing) to inform residents how to escalate a complaint. This includes raising awareness of the Ombudsman. The policy and procedure should be available in different formats and easily accessible through different media, e.g. online. Although the complaints information should be provided when a tenant moves in, they often receive a lot of information at this point, so it is important that the messages are repeated at every opportunity.

In order to ensure the policy and procedure works, it should be developed in partnership with residents and regularly reviewed by residents to ensure it is still fit for purpose. For example, ALMOs have tenant scrutiny panels to scrutinise policy and procedure. These scrutiny panels feed back to the ALMO Board about where to make improvements (see

case study 1 below). All staff should be trained in the complaints policy and procedure. It should be made clear to residents that the landlord welcomes complaints and learns from them.

Case Study 1 – Blackpool Community Housing

Blackpool Community Housing have an in-house scrutiny panel, TOWER, made up of tenants, which carries out on average 2 scrutiny exercises a year. Reports are presented to the Board with action plans monitored by the organisations' Audit Commission. In January 2018 TOWER undertook a review of the pilot complaints process which was being tested. This included interviews with 12 members of staff, customer feedback and reviews of a range of service related documents. The scrutiny was instrumental in changing the approach the organisation has to handling complaints and led to the introduction of a performance managed service that places greater emphasis on making the service as accessible as possible for all tenants.

Organisations should be able to provide robust evidence to the regulator, residents and stakeholders that their policy and procedure is fit for purpose, tailored to local circumstances and shaped with residents. Organisations should also be able to provide robust evidence that staff are trained effectively in the policy and procedure. This could include through 'dip testing' of the evidence gathered and provided by the organisation to the Regulator. Once the organisation can demonstrate that it has an effective policy and procedure in place, it should demonstrate that staff are working effectively to that policy and procedure. This includes through:

- Monitoring KPIs, including resident knowledge of how to complain and satisfaction with complaints they have made;
- Undertaking analysis of complaints data to identify trends and investigate issues. For example, there might be an absence of complaints from a geographic area which might be because of a good service or might also suggest residents are not complaining for some reason.
- Mystery shopping by tenant volunteers
- Monitoring staff knowledge of the complaints' procedure and staff behaviours around complaints
- Robust scrutiny at the Board level which gives Boards sufficient confidence that their organisation is effectively responding to complaints.

Although it is harder to measure, we believe that the focus needs to be on outcomes not on processes and procedures; and the approach should maintain a local focus to meet the needs of local residents. Organisations need to be able to demonstrate that they have a culture of welcoming complaints and learning from complaints, which needs a broader approach than just KPIs.

We would like to propose that MHCLG and the Regulator works with ALMOs and housing associations who are leading best practice in this area to understand what good looks like, and therefore, how to regulate/audit wider practice.

Case Study 2 – Homes in Sedgemoor (HiS)

HiS won an award at the UK Complaint Handling Awards 2017 for the innovative and proactive approach it had taken to manage complaints. Prior to 2017 HiS had high complaint numbers and low satisfaction scores: customer feedback was getting lost in a complex and inflexible three stage complaints' process. As a result customers were not feeling listened to and performance indicators were not being met. The organisation underwent a significant change:

- A Customer Focus Officer was employed in 2015 who became the central focus for all things feedback related. Her role was widely publicised so that a face-to-a-name approach could be used. She wrote an open letter to customers asking them to get in touch and tell her what they thought. She also ran surgeries across all neighbourhoods. A key part was acknowledging the negative press and feedback and demonstrating that the organisation was going to listen to it, learn from it, and make a change based on it.
- A full Complaint Management Review was undertaken with customers, looking at how best to rebuild trust with customers, and provide a flexible and user-friendly complaints process. Actions which came from this included the full remodeling of the complaint processes, policies and procedures; introduction of a new learning outcome process; introduction of 'better because you told us' articles relating to complaints learning, complaints workshops; and a complaints text message service (a 'rant and rave' text messaging service).
- Following this, a 'Customers First' programme was introduced which put the customer back at the heart of everything the organisation did. This is a bespoke training package created for HiS by an external provider for all staff from the Chief Executive to Business Administration Apprentices. 10 Customers First champions were introduced to drive forward initiatives to make improvements and raise standards.

The results in that year were outstanding – complaints in 2015/2016 fell by 63% and continue to fall dramatically, with performance and customer satisfaction indicators significantly improving. For 16/17 HiS have received more compliments than complaints. Performance Indicators continue to be met and customers know who to contact if they have an issue, and the Customer Focus Officer works with them to resolve their issues quickly. She also holds a complaints' learning workshop each quarter to ensure that all colleagues understand the importance of feedback. Results are shared with all customers in terms of how the organisation is performing, along with case studies and lessons.

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

We have outlined in question 8 how the Regulator could proactively regulate complaints handling and outcomes and ensure that landlords were effectively responding to complaints. Ensuring that residents can access the right advice and support when making a complaint is part of that process and includes ensuring the complaints process is easy to

understand, the initial and subsequent responses to the complaint are clear and easily understood, and timescales and processes are clear.

Clearly there are some people who will be able to make a complaint, escalate their complaint and manage the process without support. However, it is those who are less able to do this who are more likely to avoid complaining or not receive the resolution they deserve. For this reason, external advice and support is crucial.

We would expect good social landlords to understand the network of advice and support in their areas, understand their residents, and provide information about how to access different advice and support; this might include CAB, cultural groups, advocacy services, disability support groups, and carers' groups. However, one of the challenges is that external advice and support are predominately funded by local authority grant, and these budgets have been under enormous pressure, with the knock-on effect that many of these agencies have closed down or reduced their services.

We think it would be beneficial for MHCLG to do some work around the network of external advice and support agencies available to support residents, understand how effective these are, and how far landlords are supporting residents to access them. Following this, they could then consider how to ensure that residents are aware of what is available locally. For example, you could explore landlords providing this information on their websites and as part of their literature. It would also make sense for MHCLG to ensure that CABs are clear on the expectations for the sector and their local landlord process and provide them with resources to support tenants where necessary.

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

We have outlined a possible approach to regulation of complaints in question 8. Landlords should be gathering sufficient robust evidence to show that their complaints policy is fit for purpose, that staff are trained effectively in the policy and procedure, and that this is delivering the right outcomes for residents (e.g. measured through complaints' satisfaction data). The regulator could then keep a watching brief on landlords, delving deeper where it has concerns.

Our members all operate slightly different complaints' processes because they have been designed with tenants and leaseholders and meet local needs (although there are broad similarities). For this reason, we don't think it would be a good idea to mandate a single approach. The emphasis should be on getting the right result for residents. It would, however, be a good idea for MHCLG to gather examples of best practice to inform the Regulator's work and drive up standards across the sector.

Although it is easy to measure KPIs around complaints performance, it is not clear whether these KPIs are much use to most tenants, who tend to be more concerned with their own experience and how their complaints have been dealt with than broader organisational metrics. In this respect, it is no different from the other services that we get in our lives, such as from mobile phone providers, energy providers, train companies, shops –

individual experience drives our views and a large part of good customer feedback is trust which is built from previous experience. For this reason and the danger of driving perverse behaviour with the wrong set of PIs the NFA has started to bring our members together to discuss the detail of what could work for this purpose as well as working with other social housing sector stakeholders such as CWAG, ARCH, the LGA, the NHF and HouseMark to look at what our members already collect and what might work across all sectors.

A selection of existing good practice is set out below.

Six Town Housing

Six Town Housing operate a Tenant Complaint Panel as part of the democratic filter arrangement. This has worked very successfully to resolve formal complaints before they go to the Housing Ombudsman.

The Chair of Six Town Housing's Board attends the Tenant and Residents' Association meetings, which is an opportunity for all Chairs of Community groups to discuss issues in their areas with senior staff (including the Chief Executive). This then feeds through to the Board and supporting committees as appropriate.

Spotlight reviews are undertaken by tenants in areas selected by tenants based on complaints and issues with the services selected. This then results in total changes to the way that services are delivered by the organisation. For example, following feedback from leaseholders, the organisation has set up a Leaseholder Forum, improved website pages, and is working on leaseholder guide and right to buy fact sheets.

Newark & Sherwood Homes

At Newark and Sherwood Homes, the clear principle is to resolve complaints and quickly and effectively as possible; this is reflected within the timescales used and the involvement of the Tenant Panel as the democratic filter. The organisation is currently reviewing their complaints' process with tenants, and the most important messages from tenants have been:

- The complaints process should be stand-alone (separated out from the customer comments policy)
- The process should be as easy to follow as possible – with handy tips and guides for tenants
- Timescales to be reduced even further

Stockport Homes

Stockport Homes operates a two-stage process, which has two elements at stage one: fix in five and fix in ten; and then an appeal stage. The latter is a customer majority panel that reviews escalation from stage one. Stockport Homes report that the process works really well and customers enjoy being involved in the process. The organisation states: 'We have an open and transparent approach to complaints where we welcome feedback, where any potential service failure can be raised as a complaint. This gives us every opportunity to learn from service feedback. When complaints are closed we then have a structured conversation with customers about the process to identify qualitative and quantitative feedback.'

Nottingham City Homes (NCH)

NCH encourages customer feedback and the complaints process is part of that. They operate a 3 day 'fix and resolve approach, beyond which there is a 15-day response time with an option to escalate via the democratic filter (Tenants' Complaints Panel/ Councillors/ MPs). Further to this is the Housing Ombudsman.

Berneslai Homes

Berneslai Homes sets target response times for complaints in agreement with tenants as one of their local offers. Performance data is then published on a quarterly basis on their website and reported to their Board and the local authority as part of the overall performance data set for assurance and scrutiny. An annual complaints report including lessons learnt and service improvements arising from complaints is reported to Board and a tenant/customer services reviews panel looks at trends and areas for improvement if required.

Poole Housing Partnership (PHP)

During 2017, PHP's Resident Scrutiny Panel conducted a review on the quality and effectiveness of communications with residents. During this review, they identified that the Complaints Policy required updating and by reviewing a number of complaints and working with the Compliance Team, gave a clear view of what they, as residents, would like to see contained in a new policy.

The new approach which has now been adopted sets out two options for resolution, Rapid Resolution or Full Investigation, which will be offered to complainants at first point of contact and also triaged by the Complaints Officer.

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

We have talked to our members about how health and safety concerns are handled within the existing redress framework and feel that this is a complex question which needs ongoing dialogue with MHCLG.

There are two elements to this: the first is how staff in organisations recognise that something is a safety concern when it is reported; the second, is how to ensure that organisations are effectively responding to (rather than ignoring) safety concerns and are learning from them.

How staff recognise something is a safety concern

- The government could consider developing guidance to support landlords in training staff on common safety concerns (ranging from obvious ones to less obvious). They could draw on best practice across the sector to develop this guidance. Any member of staff who could potentially receive a complaint should be trained to ask the question: is there a safety element to this?
- Training into whether there is an element of health and safety within a complaint could also be included into professional accreditations such as those run by CIH.
- If landlords are using the general complaints procedures for all complaints, including those relating to health and safety, then there needs to be a way of flagging and triaging concerns which need a more urgent response.
- Guidance around the 'designated person' needs to be updated to include a section on how the designated person should respond if it is a safety concern.

How to ensure organisations are responding to and learning from complaints

- Although it is good that many landlords have in place a policy to respond to complaints quickly and informally, this could lead to broader trends about safety concerns being missed. Organisations should be recording any safety concerns raised by residents, whether they are informal concerns or formal complaints.
- Although the Regulator cannot look at every complaint, it would be possible for organisations to produce robust evidence to show that their redress framework is able to identify and respond to safety concerns. The Regulator could then do unannounced spot checks and deep dives where they are not reassured. This could be cross-referenced against KPIs and customer feedback, as well as evidence from the Ombudsman and the HSE.

Tower Hamlets Homes

Complaints are dealt with through the existing complaints system however they are recorded under a health and safety code for easy identification. Further improvements to this include an automatic email being generated to the Health and Safety Team when the Health and Safety code has been used.

Empowering residents and strengthening the Regulator

The NFA strongly believes that the Social Housing Regulator role should be strengthened to be proactive in relation to consumer standards and widened to cover all landlords of social housing including councils and their managing agents such as ALMOs. This would help provide fairness and clarity to all existing and prospective tenants of social housing. Any changes to the consumer standards and the way in which they are regulated should be designed with residents and residents should be involved (where they want to be) in the regulation of their landlord?

We think a rating on consumer standards could be added to the existing ratings on Viability and Governance and would help both the landlords and the Regulator understand how well organisations are doing in relation to customer service and focus improvement where it was required.

Whilst we are in agreement that residents need to be empowered to engage with their landlords and get redress as quickly as possible when things go wrong providing KPI comparison information may not be the best way to enable that for tenants.

However, we agree that as part of a new regulatory framework landlords should be assessed against standards that matter to residents and think that a comparator basket of KPIs would be helpful to the Regulator to compare performance and then pick out outliers for further investigation and inspection.

We believe that some programme of inspection focused on areas that matter to tenants such as health and safety, the repairs service, customer complaints and opportunities to be engaged is critical to really finding out what is going on the ground and getting the reasons behind the figures as well as being able to determine whether the landlord understands what is happening and why and has viable plans for improvement or not.

Feedback from some tenants within the sector indicates that their landlord continuing to report quarterly data on voids, repairs, value for money and anti-social behaviour including customer satisfaction was important to them. Some felt that they only wanted to see comparisons to other local landlords rather than national comparisons and that this should be shown against the amount of rent charged and other local context so that differences could be better understood. In some areas tenants had mixed opinions on the value of comparing performance to others, with some residents welcoming it for core items such as repairs and anti-social behaviour and others feeling that comparing to others adds little value.

The NFA would like to see more proactive consumer-focused regulation brought into force for Councils, ALMOs and Housing Associations. Our members agree that social housing organisations should be focused on getting the core housing management job right, knowing their tenants and making sure customers receive redress if something goes wrong but they also acknowledge that without independent checks that does not always happen all of the time within every social housing organisation. Social housing tenants do not have normal consumer choice about changing their landlord if they are not happy with

its services and a home is a very different product to a bag of apples so there should be some additional regulation to compensate for these facts within the social housing sector.

However, any additional regulation for social housing providers should be fit for purpose, proportionate and help to achieve good outcomes for tenants. It should not be overly bureaucratic or time consuming.

The NFA believes it is right for social landlords to be open and transparent about their performance and be accountable to their tenants. ALMOs are happy to be scrutinised and meet minimum standards nationally as long as they are outcome focused, possibly using the existing consumer standards, but have the flexibility to agree local standards over and above that if possible.

Our members also recognise that for regulation to work it would need to have some teeth – what happens if organisations are not meeting the standards? The NFA would like to work in more detail with civil servants considering these issues but initial suggestions from members are: applying a grading system to councils and ALMOs and being downgraded as in the RP system, having to admit when they are failing, the Regulator requesting an Annual Report each year from all social housing organisations in which performance against key indicators such as gas safety checks, complaints to housing ombudsman, STAR survey results and performance data on rent collection, voids and repairs is included. This should also be made public and sent to all tenants.

Once the Social Housing Regulator has this information they could look into outliers or cases where performance has significantly dropped during a certain time period, or the consumer standards could be given more focus during the current “deep dives” from the Regulator. The Social Housing Regulator could also have more involvement in directly monitoring council and ALMO performance. Peer reviews with tenants as part of the review team could be considered as part of any new regime so tenants talked to other tenants and could help make recommendations. If the Regulator is to start to use Key Performance Indicators (KPIs) and STAR surveys the government would have to stipulate a more regular timetable, so the information is up to date and agree with the sector the definitions and selection of KPIs. The NFA would be happy to work with the Regulator on developing a Council and ALMO sector scorecard which included key indicators on what is important for customers and then the Regulator could do quick spot checks or deep dives on outliers or anything which was a cause for concern.

The NFA is also looking at doing some work to identify good practice in monitoring ALMOs with CWAG (the Councils with ALMOs Group) and wants to identify where there are good partnerships with councils and promote the best arrangements to others to learn from. Some form of independent scrutiny of those relationships may also help ensure all tenants receive the best service, whoever is managing the homes.

The NFA would like to see the government take the opportunity to review good practice on tenant engagement, identify what works, what options should be available to tenants and promote some minimum standards. The current Tenant Involvement and Empowerment standard is a good starting point but is not something which has been focused on by the Regulator or Government recently, this could easily be rectified and the Regulator asked

specifically to look at that during any in depth assessments (IDAs). This could also be extended to Councils and ALMOs.

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

- keeping properties in good repair
- maintaining the safety of buildings
- effective handling of complaints
- respectful and helpful engagement with residents
- responsible neighbourhood management, including tackling anti-social behaviour

Members have reported that when asked their tenants are broadly in agreement that the proposed key performance indicators are the ones that are important to tenants. But given the importance of getting this right and not driving the wrong kind of behaviour the NFA is working with both our members and other social housing sector stakeholders such as CWAG, ARCH, the LGA, the NHF and HouseMark to look at what our members already collect and what might work across all sectors.

We would like a continuing conversation with government on the right set of indicators after more detailed discussion with our members and tenant consultation. We also think this is a good opportunity to ensure that cases of domestic abuse are correctly identified by landlords and not conflated with anti-social behaviour - which can lead to people being evicted and penalised unfairly and that an appropriate policy is in place to guide landlords on how to respond to domestic abuse and signpost to specialist services.

The Government should consider the creation of a key performance indicator for social housing landlords on the response to domestic abuse, as well as on the response to anti-social behaviour, and work with DAHA, a group the NFA supports to design how to ensure the indicator will capture the response that survivors are receiving from their landlords.

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

Yes, once those KPIs are agreed, and make that available and accessible to tenants.

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

Yes.

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

The NFA believes that having tenants and/or leaseholders on boards with wider tenant engagement structures in place underneath helps set the culture that organisations should be open and transparent with the residents. We also believe that the Regulator expecting this to be the case and proactively regulating to ensure consumer standards are being met and tenants are listened to will help focus some organisations' minds and deliver on this agenda. However, the change in culture required in some organisations may only come about with different leadership and a change of board membership or senior staff.

We also know that having tenant board members is not sufficient in terms of tenant engagement for social housing organisations and we would urge the government to focus on ensuring that all social housing organisations make sure the tenant voice is heard in a variety of ways and that these voices are listened to and acted upon at board level whatever the make-up of the board.

The experience of the ALMO sector in terms of having a carrot and stick approach (requiring a 2 star or more rating from the Audit Commission to unlock Decent Homes funding) has been proven to deliver a real change in both the service provided to council tenants and the culture within ALMOs to be much more customer focused organisations.

Table one summarises the inspection scores for housing providers for all inspections over the period that the Audit Commission carried out housing inspections.

Type of provider/ inspection score	Poor (%)	Fair (%)	Good (%)	Excellent (%)	Number of inspections
ALMOs	1%	19%	59%	22%	145
Housing associations	11%	56%	32%	2%	251
Local authorities	17%	62%	19%	2%	655

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?

ALMOs operate comprehensive complaints frameworks, with tenants and leaseholders involved in the development of these frameworks and the scrutiny of complaints. ALMOs also have robust processes to ensure that the information from tenant engagement is fed into governance processes and is used to improve services and processes, ensure value for money, and develop new services to meet the needs of communities. These change from ALMO to ALMO depending on tenant feedback and local needs. They also utilise a range of methods to communicate the outcomes of tenant engagement – the “you said, we did” element of the feedback loop and recognise that this is an essential part of the process. Openness and transparency are key parts of this, with annual reviews, scrutiny reports and other documents freely published and available online and in print. Some examples of this are provided below and some can be found on the following websites: [Berneslai Homes](#), [Your Homes Newcastle](#) and [South Tyneside Homes](#).

Newark & Sherwood Homes introduced an Affinity Mapping Approach when analysing customer complaints which enables them to identify, tackle and eliminate basic service issues and prevent them from being a repeat concern. Complaints are regularly analysed and grouped by commonality and recurring themes through Affinity Mapping. This then feeds into improvement plans which are developed with relevant managers. Progress against the plan is reviewed through one-to-ones and team meetings, as well as being measured against weekly raw data. This enables the organisation to evidence clear improvement in performance which has a direct link back to tenant feedback and performance improvement actions.

Six Town Housing has introduced a number of changes to the way that the organisation works as a result of complaint analysis. This includes:

- Following feedback about ways of paying rent, the organisation reviewed and introduced a range of ways to self-pay, which was taken up by 1,000 customers immediately;
- Following feedback from leaseholders, the organisation has set up a Leaseholder Forum, improved website pages, and is working on leaseholder guide and right to buy fact sheets.
- The organisation has also dramatically re-shaped itself to deliver a locality-based service to customers. This has included training teams in all aspects of Neighbourhood/Tenancy Management to provide a locality worker who works within the neighbourhoods, avoiding the need for tenants to have to call into the office to access services.

Cornwall Housing started talking to tenants in communities and canvassed views by email about how they could improve their resident engagement in the summer of 2016. Residents said their priority was for the organisation to listen and act on residents' views. In the shadow of Grenfell, the organisation felt that there was renewed vigour to the conversation. In a working group made up of tenants and staff from across the business, they considered in what circumstances the organisation could be deemed "not listening and acting." For example, they may be sent the minutes of a Resident Association meeting or a staff member may attend a meeting, and it is not clear that the group or an individual are expecting a response from the organisation on a particular point. As a result of this, the organisation has just got support from the involved residents to create an online form for resident Associations and Community Representatives so that they can specifically request responses to key points or questions about their communities. From this, they will be able to monitor the timeliness of responses and analyse what residents in different communities are saying.

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

Yes, but in partnership with social housing organisations and organisations like HouseMark which have expertise in this area.

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

A regular newsletter containing performance information that is both printed and available on the internet would help tenants digest performance information and get used to trends and issues. A template that is easy to understand, is in plain English and has been agreed with a number of tenants would help provide some consistency. Focus groups or performance workshops could be held to ensure tenants understand the performance data and have the opportunity to ask questions and seek clarification. A website where tenants could click on the local authority area and filter all the landlords in their area to look at comparable performance indicators could be useful. If available, then all housing providers should have to provide the link and information about those comparisons.

Many ALMO tenants acknowledge that good landlords already provide this type of information in newsletters, through websites and on social media and there is existing good practice that could be built on in this area.

Annual Reports are also useful as long as they present information tenants are interested in in easy to understand ways and allow for comparisons but also context to explain particular issues or problems. Again, HQN did some work identifying good practice in this area some years ago which should be re-visited.

We are not sure that league tables are a useful publication but if all landlords were rated on consumer standards the ratings could be published and tenants would have a general understanding about where their landlord was on the spectrum that may be helpful. It has been suggested that tenants would be more interested in regional comparisons or in comparisons between similar types of landlord, rural or urban, size etc.

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?

Yes, members felt that badly performing landlords should not be able to develop more homes to manage badly and it would help focus Boards' minds. However, some landlords do not develop or use grant funding so some other financial incentive would need to be found for those who that mechanism would not apply to.

A good alternative for some tenants might be a “Right to Switch” housing management provider. This could kick in if performance fell below a certain threshold and would be a deterrent to Boards who would not want to own stock being managed by someone else.

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?

Some are, yes and across the sector there are many examples of where this is happening. The whole sector needs to learn from best practice and be encouraged to take it seriously.

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

Yes, tenants have felt ignored by central government and vilified by the press in the recent past and stronger representation at a national level would help re-build trust and understanding between tenants and government again and possibly give them a voice to better communicate with the national press. It would also help inform government policy making in this area and allow residents’ concerns to be raised at the highest level if there were widespread issues developing within the sector. It would also be good to consider the need for strong regional structures underneath a national body, so that regional feedback is gathered as the issues tenants face in both the housing market and their communities can differ greatly between regions and areas.

22. Would there be an 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?

There does not seem to be a great deal of interest in another stock transfer programme from our members at the moment but it is difficult to gauge member interest when we don’t know what any revised guidance might look like e.g. will there be funding for debt write off as in previous transfer programmes.

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

It may do but the appetite for TMOs and the Right to Manage has not been strong amongst ALMO tenants recently. Given that many tenants just do not have the time to get as involved as they may wish, a “Right to Switch” housing management provider might be a more useful option for some groups of tenants. Or the government could look again at incentivising options like ALMOs where tenants are on the board and have a seat at the table but do not have to do everything themselves.

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?

Given only one of our members has TMOs within the stock they manage we cannot answer this question.

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

We believe the ALMO model provides residents with good opportunities for engagement and therefore brings in an element of choice and control over services provided to tenants by the ALMO. Tenants and leaseholders sit on the board so help decide on strategic decisions around priorities for spending as well as informing changes to policies and procedures where necessary through tenant scrutiny boards, resident groups, complaints and comments via social media or face to face meetings.

As mentioned earlier a right to switch housing management provider if performance fell below a certain threshold might also be a good alternative for tenants and an incentive to Boards who would not want to own stock being managed by someone else.

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?

There can be benefits where a group of tenants really want to do this and have the time and capacity to do so although our members believe that most residents would prefer a good service delivered by their landlord and the main focus should be on ensuring this happens through incentives and regulation.

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

As mentioned before most of our members have a form of tenant scrutiny in operation and they use this to focus in on issues of concern to residents, doing a full investigation into the problems, possible solutions and then make recommendations to the board for changes.

Issues are picked up either through door knocking exercises, a review of complaints or regular surveys. In many cases tenants and leaseholders are represented on procurement panels when selecting new service providers (looking at quality, cost and vfm) and are included in any major service reviews. An example is provided overleaf:

Tenant involvement in service procurement at Newark and Sherwood Homes

Two tenants were involved in the procurement of the district wide grounds maintenance contract; a significant service to tenants and leaseholders living in Newark and Sherwood. The tenants were fully involved in February 2018, sitting alongside Newark and Sherwood Homes staff on the procurement panel. Nine contractors were considered and assessed using quality criteria.

Tenant panel members focussed on a number of points:

- i. The response to and speed of resolution if quality was deemed as poor in a particular area
- ii. The attendance at tenant involvement meetings
- iii. Working with communities to improve the estates and investing in programmes to support this

The procurement process resulted in appointing a new contractor - delivering an improved service and greater value to tenants.

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

A lot of work has been done on this issue in the past and we would refer you to good practice that has developed over the years in London. As leaseholder levels rise across the country it would be good to help spread good practice.

We don't believe there is anything significant that needs to change in regulation or law for the leaseholder but think that consumer standards should apply to them too and as part of any assessment of consumer standards the Regulator should look at how leaseholders are dealt with, if there are any particular issues coming through complaints for them specifically and include that as part of their overall judgement. Landlords should all be adhering to existing legislation on consultation and in our experience, leaseholders are very much included in all of the "tenant" involvement and engagement work and would not be disadvantaged by their tenure in that respect.

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?

The consumer standards should be reviewed to bring them up to date and tenants should be consulted. However, from our perspective the standards themselves do not seem so far from what tenants might want but the framework needs to change to a proactive regulation of these standards like governance and viability rather than reactive to failing the serious detriment test.

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.

Yes, and be asked to do short notice/no notice inspections and mystery shopping to provide them with a range of tools with which to assess social housing providers.

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?

No – the regulation on the consumer standards should be proactive not just reactive and be looked at in the same way as Governance and Viability. The Regulator could set up a Consumer category and give out C ratings – C1, C2, C3.

32. Should the Regulator adopt a more proactive approach to the 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?

Yes, and yes and the Regulator could target those outliers on PIs, those who have had lots of complaints about a particular issue and those referred to them by other organisations such as the Housing Ombudsman or tenant panels or a national tenant organisation.

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

Yes – all social housing tenants should benefit from the same regulation on consumer standards

34. Are the existing enforcement measures set out in Box 3 (p42) adequate? If not, what additional enforcement powers should be considered?

No – all social housing tenants should benefit from the same regulation on consumer standards and therefore the Regulator needs the same powers over all social housing landlords.

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

For ALMOs, we believe the current framework works well but as stated earlier would benefit from some additional oversight and testing from the Regulator which has been absent recently in the local authority world. As we have indicated the NFA believes the Consumer Standards should be proactively regulated and that regulation should apply to all social housing landlords and managing agents. If Local Authorities are to be the primary body which is regulated then any monitoring and/or inspection regime should test the relationship between the council and whoever is carrying out the management of their properties be that a TMO, an ALMO, a housing association or a private contractor.

ALMOs and councils enter into management agreements or partnership agreements which set out what roles and responsibilities each party has. These are still invariably based on the standard model agreement developed by Trowers and Hamlins for ALMOs when they were first established by Government with some local variation where required.

Management or Partnership Agreements between local authorities and their housing companies provide the framework for managing performance and holding ALMOs to account. A robust framework requires a positive and constructive relationship that places tenants at the heart of decision making. Effective communication, protocols and clarity on roles and responsibilities is essential to making the ALMO / local authority arrangement work. Both parties need to be clear and active in their roles for the relationship to be successful. Each ALMO and council will agree the framework most suited them and their structures but in general include regular meetings, quarterly and annual reporting to council officers and politicians as well as attendance at council scrutiny meetings and agreeing performance targets, service fee, works fee, procurement plan and asset management strategy on an annual or bi-annual basis.

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

No comment

Tackling stigma and celebrating thriving communities

Under the leadership of Sue Roberts MBE the NFA starting raising this issue in earnest in 2015 with its contribution to the housing day campaign #ProudTenant, continued it through its photography competition and brochure "Ordinary People, Extraordinary Lives" in 2016, an exhibition in the House of Commons in 2017 and another competition and brochure "Celebrating Community Champions" this year.

The NFA has supported the "See *the Person*" campaign (formerly referred to as Benefit to Society Campaign) since its inception, the NFA is a steering group member of the campaign and has financially supported it, and a number of ALMOs engage with it on an

individual level. We have always sought to promote a positive image of council housing tenants throughout our work. The *See the Person* Campaign featured prominently in the Social Housing Green Paper with the Government recognising the value of the campaign and encouraging others to support it.

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

We do not feel that a best neighbourhood competition is the most effective use of resources to tackle the stigmatisation of social housing. It is not the communities who stigmatise themselves – most are proud of their homes and their neighbourhoods – it is other people who look down on them because social housing tenants are not homeowners and therefore people think they do not have a stake in society.

We feel that long-term investment and meaningful support into communities is what is needed, supporting initiatives and projects which are already underway, for example those which improve life chances and empower communities. We also feel that resources would be better spent on building more social housing and ensuring that the welfare system supports those who are most vulnerable.

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

The NFA is pleased that the Government has recognised within the Green Paper the importance of tackling stigma and celebrating thriving communities. The NFA has been campaigning on this issue for a number of years and are a proud part of the steering group for *See the Person* (formerly *Benefit to Society*), represented by our two tenant Board Members, Sarita-Marie Rehman-Wall and Sue Abbott. We look forward to further ministerial support of the *See the Person* Campaign.

Whilst sharing positive stories of social housing residents and their neighbourhoods is a good starting point in the fight against stigmatisation, there is a considerable amount of work to be undertaken to genuinely tackle stigma, and the Government needs to recognise that it is a deep-seated problem with significant historical roots.

We need a consistent, long-lasting commitment from the government to ensure that social housing is recognised as an equal tenure within a mixed-tenure market. This includes calling out ministers and MPs who perpetuate stereotypes and stigma around social housing and social housing tenants and residents.

For many ALMO tenants, social housing is not a 'stepping stone' to home ownership, but is a tenure of choice, where they live, raise families and invest in their community. It is also a tenure that people should be able to access at different points of their life as their circumstances change. Whilst the Green Paper does recognise the value of social housing, it continues to put it in a hierarchy under home ownership, and such hierarchy has, over a number of years, enabled the stigmatisation of the tenure.

Alongside this, there has also been an increasing residualisation of social housing as a result of government policies, including the Right to Buy; and lack of government support and financing over a long period of time. This has led to a reduced number of people who have direct real-life experience of social housing, which has made it easier to perpetuate prejudices and stereotypes. We welcome the Government's commitment to building more high-quality social housing, including announcements around removing the HRA borrowing cap, and this should have a positive impact in relation to stigma. However, we are still calling for the Government to go further in its reforms of Right to Buy to ensure that the drain of social housing stock does not continue.

The residualisation of social housing has led to a long-term trend towards the concentration of less advantaged households in social housing, which means that it is housing those who are already the most vulnerable, have the smallest say, and face considerable societal prejudices and disadvantages; as the Green Paper states, almost three quarters of social renters are in the bottom 40% of the income distribution (point 14); and half of social households have at least one member with a long-term illness or disability (point 13). For this reason, any work on stigma needs to be dovetailed to work on life chances, community building, welfare reform and inequalities, and should not stand alone. The stigma around social housing does not emerge from thin air, it is linked to society's judgements about – and preconceptions of – work, life chances, disability and value.

The See the Person campaign has proposed a number of concrete steps that the Government could take to begin to tackle the stigma against social housing tenants, and we endorse these:

- The See the Person campaign needs significant resources to run a national campaign. They would like financial backing from the Government
- The campaign would like Government to look at ways of holding the press to account; perhaps the IPSO code should be changed, or something could be done through OfCom
- The campaign would like the Government to help them to access major media figures. They would like them to attend a seminar or event with politicians, tenants and others to discuss the stigma and what can be done about it
- The Government could consider a Youth Forum to work with young people in social housing
- The Government could help fund the development of bespoke training for housing providers to raise awareness of stigma and its effects.
- The Government needs to take action when its own politicians use stereotyping language about social housing

We propose that the Government funds further research into how the stigmatisation of social housing is leading to discrimination against social housing tenants and reducing life chances within those communities. Anecdotal evidence from tenants living within our ALMOs is that stigma against them does impact on their lives (for example, through postcode discrimination in job applications). Clearly this links to a broader debate which must be had on socio-economic discrimination.

Much of the narrative around stigmatisation and social housing puts the burden onto social housing tenants to evidence their worth to society – through case studies, positive stories, neighbourhood competitions etc. Whilst it has been useful to build up a database of positive stories and images to combat media stereotypes, the burden must now be moved to wider society, including the media, to be called out when they stigmatise social housing tenants.

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

We understand that there was some feedback from tenants during the roadshows around the professionalisation of housing staff, including how some housing staff perpetuate the stigma around social housing through their behaviours and attitudes. This is unacceptable and poor practice needs to be challenged.

Question 39 is closely linked to questions around complaints and performance indicators. Organisations need to demonstrate effective complaints and resident feedback mechanisms that enable residents to feedback concerns about individual staff, but also concerns around organisational culture and behaviours (e.g. trustworthiness/ treating people with respect). Organisations need to demonstrate that they have listened to these concerns and acted upon them, which can then be measured in performance indicators, for example around quality of customer standards, service delivery and how far residents feel listened to.

Organisational cultures are set from the top, so organisations need to be able to demonstrate clear leadership from Board and Executive level, and strong customer-orientated values. This strongly links to resident engagement and how far residents are involved in the organisation. All ALMOs have residents sitting on their Boards and all employ residents throughout their governance structures, for example through scrutiny groups, to ensure resident voices are heard and shape the organisation. The involvement of residents ensures a strong focus at the top on customer service, which sets the standards for the whole organisation.

In terms of professionalisation of housing management, we have a few comments:

- We would be keen to see a reinvigoration of professional qualifications across the sector, but there needs to be an acknowledgement that public sector cuts have reduced the level of resources that the sector has to invest in staff. This includes in areas where skills are in high demand in the private sector, such as construction.
- It is important to recognise and reward staff excellence. The government could consider introducing bursaries and other funding to attract and enable young outstanding housing professionals to develop within the sector.
- We would welcome a continuing – and increasing – government investment into apprenticeships. In our last survey at December 2017, ALMOs employed around 300 apprentices in a range of roles, and the sector is a great supporter of apprenticeships. Apprentices work across all areas of housing management, from leadership and management roles, to frontline housing roles, to trade apprentices.

Apprenticeship standards can be aligned to organisational visions and values to ensure that new staff are developed in a way which means they deliver a high quality of service.

- We would welcome the inclusion of specialist training on domestic abuse for all social housing landlords and housing management providers. Up to date resources and information about local specialist services and where to signpost tenants experiencing domestic abuse must be held by all social housing landlords.

Organisations need to demonstrate robust training, development and management programmes that are designed to ensure staff deliver a good quality of service. A number of our members hold a range of external validations across varied areas of their business. These are important because they require organisations to scrutinise themselves against externally recognised standards, put in place improvement plans to work towards accreditation, and provide a transparent and independent assessment for external assurance for tenants, the parent local authority and other stakeholders. They also require ongoing activity to ensure the accreditation is maintained. Examples of the types of assessment our members use are listed below.

Newark and Sherwood Homes has accreditations including Investors in Excellence, Investors in People, Customer Service Excellence, ISO 9001 Quality Management Systems, and the Royal Society for the Prevention of Accidents. Recent awards include Best Companies – One to Watch 2018 and Housing Heroes Development Team of the Year Finalist 2017.

Stockport Homes Group is an Investors in People Champion and it has achieved Good Practice status for its investment in the health and wellbeing of staff. For Stockport Homes, these initiatives create a sustainable, motivated and professional workforce that delivers a high-quality service for customers.

St Leger Homes of Doncaster has achieved a Customer Services Excellence Accreditation through the Government. They have been accredited for 8 years in a row for this award, with 30 out of 57 elements rated as Compliance Plus. This sets clear guidelines and expectations for staff on customer service.

Good housing management is core business for our members and, as the evidence presented earlier from Tower Hamlets Homes illustrates, getting back to basics, door knocking and getting to know residents can deliver on a number of different fronts including good health and safety management but also good use of stock, identifying fraud, vulnerable residents who need additional support. The need to better manage fire safety and other complex issues in social housing, particularly in multi-tenure situations and blocks of flat blocks, means you need to have effective housing management capability to identify and action issues regularly.

The NFA is very supportive of this type of approach and the tenant feedback from those already implementing this approach is very positive. We recommend that the Government and the Regulator investigate good practice in this area and build that into some of the

KPIs on good housing management. Some examples of other good practice in this area are shown below.

Colchester Borough Homes – carried out tenancy audits to all their properties.

- Rent arrears reduced from £433,000 to £256,000 over the 3 years.
- 28 fraudulent lets uncovered -of which 3 were taken to legal process
- 954 unauthorised alterations -cost around £30k to inspect, arrange remedial works and grant retrospective permission
- 29 referrals for support -far less than we expected
- Under occupation reduced through incentives and home swaps
- 1,200 (1,432) under occupied homes - 913 (947) overcrowded
- Communication with tenants improved -email addresses saving on post costs, mobile numbers for text messaging and contact

Residents said:

- “About time somebody kept an eye out, and found out what is happening”
- “Great to see someone from CBH – without having to wait for something to go wrong”
- “What I’d expect any good landlord to do”
- “I appreciate that you are busy, but it seems fairer to spend time with everyone, not just on those who have problems”
- “Really appreciated the visit and advice, it’s nice to see that CBH care about us in the small villages”

Sutton Housing Partnership have introduced a new operating model and a “New Deal or Residents”, this followed the debate about the future of social housing and listening to the tenant voice. They decided to change the role of the Housing Manager and re-focus it on contact with the tenant, being curious and playing the role of housing detective, finding out what is going on at home and problem solving where residents need that active input in order to sustain their tenancy. The aims were to:

- Get closer to residents: creating mutual trust and confidence and solving problem
- Have generic place-based teams delivering holistic estate management, income, tenancy management and sustainment services
- Improve and change how residents can contact and access services
- Align patches with caretaking and repairs to get things done together and improve resident experience
- Direct resources into frontline services that make a difference to residents’ lives
- Deliver services through local hubs, with enhanced digital access and self-service

They instituted an annual tenancy visit to help value the relationship and sustain the tenancy. The visit is also used as an opportunity to persuade tenants to pay the rent by Direct Debit, collect up to date contact details and preferences, identify necessary repairs and give information about how to look after their home - fire safety; damp and mould; leaks; fixtures and fittings; garden upkeep; tenant responsibility repairs. It is also used where appropriate to talk about work and training opportunities, home energy options; financial inclusion; becoming connected and digital inclusion.

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

We have provided our detailed comments on key performance indicators in Chapter 3. But would also like to highlight that the Government needs to ensure that landlords are being measured for something that they have 100% control over, which is not always the case in the area of good neighbourhood management. It is also very difficult to measure whether landlords are providing good neighbourhood management in one key performance indicator, since it is an area which covers a range of things. The NFA will continue to discuss this with members as well as other key stakeholders but this is one of the reasons we think that KPIs should only be used as part of the toolkit for the Regulator to identify issues and trends and be a “can-opener” for further investigation and we suggest inspections, which would be much better at finding out whether landlords are providing good neighbourhood management. Inspection teams could consist of (paid) tenant inspectors as in the old days of the housing inspectorate alongside housing professionals and could look to more recent peer review teams to learn lessons and spread good practice.

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?

The NFA has compiled considerable evidence over the years of the impact that ALMOs are playing beyond their key responsibilities. Evidence from across the ALMO sector can, for example, be found in the following NFA publications:

- Improving Lives: Enhancing the Life Chances of residents in our communities (2017)
 - Health Creating Practices, shining a spotlight on housing initiatives (2018)
 - Stretching the Pennies (Value for Money) (2016)
 - Safe and Well: Improving Health & Wellbeing (2015)
- ALMOs do already report on the social value they deliver as part of their commitment to tenants and their parent local authorities and would have no issues with making this a formal requirement. ALMOs and local authorities have increasingly housed those who are the most vulnerable in society, and many have developed innovative services and partnerships to support those individuals to maintain their tenure and achieve their potential. ALMOs do a huge amount of work in areas including (but not limited to):
- Training, mentoring, upskilling and apprenticeships; and support into work
 - Healthy living and supporting good mental health
 - Initiatives around complex families
 - Warm, safe and secure homes
 - Aids and adaptations
 - Reducing social isolation and improving social inclusion
 - Homelessness prevention and intervention programmes
 - Domestic abuse support and intervention

- Hospital discharge, re-ablement, step-down accommodation etc.
- Partnership working with third sector and statutory organisations to improve life chances, including providing funding and support
- Financial wellbeing initiatives and supporting tenants through welfare reform
- Digital initiatives
- Support to maintain tenancies
- Programmes to reduce ASB
- Volunteer programmes
- Developing energy efficiency homes

The social value that good social housing landlords – including ALMOs – deliver is absolutely integral to a healthy and functioning country. It ensures that areas which have traditionally been poorer and more disadvantaged are able to meet their potential; reducing health inequalities, supporting people to stay healthy for longer, enhance their life chances, and contribute to a thriving economy. As well as being a social value in itself, it delivers powerful benefits for other third sector and public services, including the NHS. ALMOs often support locally-based organisations, initiatives and charities, which also contributes to the social assets of their communities.

However, some of our members have raised concerns that social housing providers, and specifically local authority housing, is increasingly being stretched as other public services (including police, care services, the NHS) are being stretched and/or reduced. Although ALMOs have adapted to provide innovative services, this is not seen as sustainable long-term without sufficient funding and recognition of the additional role that social housing is playing in communities.

Finally, conversations around social value should not distract from landlords providing good quality core housing services, which are to maximise income collection, deliver repairs well, keep estates clean and safe, and reservice empty properties quickly and at optimum cost.

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

All of our members have anti-social behaviour policies and work closely with their local authority and police colleagues, often through safer community partnerships to identify and tackle anti-social behaviour in their communities.

HouseMark currently collect data on an anti-social behaviour PIs and provide a specialist benchmarking club on ASB. HouseMark carry out detailed analysis of benchmarking data submitted by members to examine their performance around antisocial behaviour (ASB) and provide members annual reports on their findings. Examples of the some of the PIS are the numbers of households reporting ASB, the number of cases for every 1,000 properties, how long they take to resolve, satisfaction with landlord case handling and satisfaction for case outcomes. We also need to ensure that cases of domestic abuse are correctly identified and not conflated with anti-social behaviour - which can lead to people

being evicted and penalised unfairly and that an appropriate policy is in place to guide landlords on how to respond to domestic abuse and signpost to specialist services.

We therefore believe that Government should consider the creation of a key performance indicator for social housing landlords on the response to domestic abuse, as well as on the response to anti-social behaviour, and work with DAHA to design an indicator to ensure it will capture the response that survivors are receiving from their landlords.

Examples of good practice in this area amongst our members are listed below:

STAR Housing in Shropshire is committed to developing and maintaining vibrant communities. A key element of this is to ensure our communities and tenants are safe. STAR Housing acknowledge that living with crime and anti-social behaviour causes distress to residents and damages communities. They encourage tenants to report ASB and they take a robust approach to tackling these issues, taking such reports very seriously and adopting a victim centred approach to those affected. They use all legal and non-statutory options available to them to assist in modifying behaviours and minimise the harm caused.

Where it is appropriate, in serious cases, where investigations stretch beyond their properties, such as the recent 'county lines' drug investigations, they have strong partnership working arrangements with West Mercia police and other law enforcement agencies such as Merseyside Police and are actively involved in local crime and disorder partnerships such as the safe neighbourhood team in Shropshire. This joint working has provided solutions through closure orders on affected properties and the arrests and prosecution of the offenders. This enables STAR to send a strong message that we will not tolerate crime and anti-social behaviour in our homes or communities from tenants or their associates.

Colchester Borough Homes

In Colchester the local authority and ALMO work closely with Police and other agencies on the Safer Colchester Partnership. The ALMO provides an antisocial behaviour service for the whole borough regardless of tenure and is active in antisocial behaviour hotspots such as the town centre. The ALMO provides local partners (including the Police) with training on the legislation and tools available to tackle anti-social behaviour. Through partnership with the Police and public services the landlord role is strengthened and provides confidence to the wider public.

Poole Housing Partnership

Through the autumn of 2017, ASB by young people on one estate in Poole steadily increased. It escalated to a situation where a few young people were stealing knives and threatening residents, with other young people sucked into a wider gang involved in violence and intimidating local residents. Local partners including the Police, Community Safety Team, Poole Housing Partnership and Residents Association, worked together to support the community. However, at this time trust of the community in these partners was being eroded by a perceived lack of action.

A residents meeting was held with over 90 local residents attending. Local partners attended, as well as Councillors, Environmental Health, Youth Services and the voluntary sector. At the meeting some members of the community assumed the trouble makers were social housing tenants and asked why they were not being evicted. Fortunately an attendee spoke up saying most perpetrators were not social housing tenants, and actually Poole Housing Partnership was mostly involved in supporting tenants who were victims.

The meeting acted as a catalyst. Partners were collating evidence and actions were underway but due to the age of those involved actions were necessarily around changing behaviour rather than punishment. It was therefore not possible to give specific details about action to the community.

PHP realised that residents were unclear about how to report incidents and to which organisation. Initially a fact sheet was produced with photos and contact details of the police, Community Safety Team and PHP. This was posted around the estate, sent to tenants and published in the residents' association newsletter as well as on all agencies' websites.

Further to this, PHP led on drawing up a communications strategy. This drew together information on all opportunities to keep the community informed such as agency drop-ins, newsletters, estate tours, events and coffee mornings. Agencies agreed how these opportunities would be utilised to best effect. PHP organised a Wellbeing Day providing a positive event for residents to feel valued and agencies to build relationships.

Agencies also agreed to support each other in increasing the presence and visibility of all partner agencies on the estate and carrying out joint patrols and estate tours. Regular partner meetings were held to ensure all available tools and actions were used appropriately and in sync to support agencies and the community.

The wider gang were targeted with joint visits to explain the effect the young people's actions could have on tenancies. Acceptable Behaviour Contracts were issued, tenancy warning letters sent. This helped lower levels of ASB. The core group of perpetrators, who all had many problems, received intensive coordinated action such as injunctions to stay away, new foster placements, joint action plans. As a follow up, PHP ran a programme of summer activities for young people when the youth club was shut for refurbishment.

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

As this is a local authority issue, this is not an area that we are providing an in-depth response. However, it is our view that good design in the social sector can be achieved through the grant funding programme, but it should also apply to private housing too. We would also add that there needs to be a focus on designing lifetime, accessible homes with a strong focus on carbon neutral and energy efficient designs. Social housing should look no different from other tenures.

There is also already a considerable amount of evidence and best practice available on good design in homes and communities which should be used. See for example the Housing Learning and Improvement Network resources (HousingLIN).

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

First, new developments, regardless of their tenure, should be planned and designed in partnership with the people who are going to live there and the communities in which they are going to be placed. The question should not be 'how can we encourage social housing residents to be involved in the planning and design of new developments' but 'how can we encourage people to be involved in the planning and design of new developments?'

Second, there has to be a clear understanding of what genuine community consultation is. Too often it is seen as letting people choose the colour of the wallpaper or the name of the development after all the big decisions have been taken. Actually, genuine consultation should look at what is being planned, where it is being planned, what communities have and what they need. Giving people control and choice will give them a reason to get involved. There is a sizeable amount of learning around asset-based community development which can be used here.

Third, the question is also worded wrong, because the emphasis should be on encouraging (or mandating that) planners and designers do effective community engagement utilising best practice which already exists. Social housing tenants are just as busy as anyone else and need to be convinced that their time is worth giving. Too often the problem is that there is a piece of land available for a new development, funding available for a certain type of development, and that is the reason for it being built. Schemes are then developed in places where there is poor infrastructure and you end up with ghettoisation of different groups. Residents and communities are then consulted when it is too late.

Fourth, as well as involving communities in planning and design, there is a real need to design with certain groups from the start; for example, working with disabled people, working with older people, people living with dementia, people from different ethnic communities. Again, this is not just a question for social housing, but is tenure-blind. Good design should be accessible for all, and there is considerable good practice already available which the government should refer to.

Fifth, planners and designers should also be consulting and working with community groups, charities, organisations, statutory agencies to understand how their developments could help these groups. Examples include integrating libraries, creches, doctors surgeries or drop-in centres, renting out space to community health teams, providing computer access, meeting rooms, shops, cafes, allotments and outside areas. Again, genuine community consultation with both those who will be living in the developments as well as the wider community will ensure that new developments contribute to the assets of a community rather than becoming white elephants.

In short, the government should be pulling together best practice guidelines which exist in all these areas and ensuring that planners and designers are following them.

Expanding supply and supporting home ownership

The NFA really welcomes the lifting of the HRA debt caps as a significant contribution to increasing the supply of affordable housing in this country and we will be supporting our members to make the most of this opportunity and start to deliver many more new homes for their communities.

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?

We are very happy that the Government has now lifted the caps on HRA borrowing for all stock owning councils across the country and believe that this will be the single biggest factor enabling councils to significantly increase their development of new council homes.

Given that any borrowing undertaken by councils within their HRA will be repaid through rents over time we do not believe this should count in the same way that grant funding which is a subsidy that does need to be covered by government income through taxes. The NFA produced a report in 2013 highlighting this issue and explaining that the way in which the UK government chooses to define its expenditure and borrowing is unique in international terms. *Treating Council Housing Fairly* sets out how Government could choose to look at the public corporate sector (which council housing forms part) separately and focus on the most widely used international debt statistics of 'general government' and exclude the public corporate sector.

We believe that both grant funding should be increased and councils able to borrow to build as both of these different types of public investment will help deliver government aims and objectives to improve neighbourhoods, build more homes and provide savings to the public purse through improved health outcomes, lower payments on temporary accommodation and private sector rents.

To complete the necessary financial framework for councils and ALMOs we welcome the recent consultation on more flexibility in the use of RtB receipts but would ask the government to go further and extended those flexibilities to all councils across the country.

We very much welcome the proposal to allow councils to pass RtB receipts to their ALMOs and believe it would significantly help to increase the delivery of new homes across the country

We fully support the Right to Buy policy but believe discount levels need to be reduced back to sensible levels and eligibility criteria lengthened again to ensure it is sustainable for local councils, communities and better value for money for the public purse.

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

ALMOs such as Derby Homes have supported community groups to build new homes in their area.

OSCAR (Osmaston Community Association of Residents) was formed in January 2011 to deliver the community led regeneration of an area, including derelict land formerly occupied by Rolls Royce. Derby Homes supported residents in the formation of the association and provided a community office and a dedicated officer to assist. Working in partnership with Derby Homes, Derby City Council and Strata Homes, OSCAR developed the Osmaston Regeneration Partnership to manage and deliver this new build development.

The composition of this new build site was carefully considered, prior to development, there were no one bedroomed properties for rent in the area, and just three bungalows. Of the 95 new houses built so far, 40 are social housing properties – ten bungalows and thirty – one or two bedroomed houses. The development of smaller properties has created downsizing opportunities, in turn, releasing a number of three bedroomed homes for families.

In addition to £1.1million funding from the HCA, OSCAR secured a low-cost loan from Derby City Council. The council also transferred the development land to OSCAR on a 125-year lease at a peppercorn rent, with an option for OSCAR to buy the freehold in 30 years.

ALMOs, councils and RSLs could all be utilised by community groups to lead on some of the more challenging aspects on development and either provide training or direct services to help boost community led housing projects.

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?

With the very recent announcement of the lifting of the debt caps, the abolition of the forced sale of HVA and the rent commitment for 5 years we believe that councils and ALMOs across the country will be able to significantly revise their development plans upwards.

However, we have not yet had the time to look at estimating any new numbers for the amount of council housing new build that could now be delivered. Research from 2012, undertaken by Capital Economics for the NFA, ARCH, CWAG and the CIH *Let's Get Building* said "Currently councils have 'headroom' to borrow an additional £2.8bn to invest in housing. But without the caps they would currently make plans to invest a further £4.2bn. If encouraged to invest, their maximum potential might be £7bn over five years, building up to 12,000 extra homes per year."

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

We are aware that members are already delivering shared ownership where there is a demand and finance available but in many areas there is not as much demand for this as there is for social rented properties. Shared ownership should also be considered as a viable option for older people. This is in part because it allows older people to free up equity if they need it, but also helps in areas where retirement housing is the same price as family sized housing, allowing people to downsize if they wish, freeing up family sized homes for younger families. Integrating that fully accessible, lifetime standard, shared ownership into mixed development sites so that older people don't have to move into retirement housing communities if they don't want to would help provide some more attractive options for older downsizers.