



# Social Housing White Paper

Your Definitive Guide



IFF Research

# The white paper has landed. Giving us lots to think about...

The much-anticipated social housing white paper is finally here, only 826 days after the green paper for those of us who were counting. Like so many things since the tragedy at Grenfell, Brexit, the elections and now Covid have taken precedence. But now is our time – and while the white paper's reception across the sector has been decidedly lukewarm, there's no denying it will create change and open the door to new ways of working. It's up to us to make the best of these new opportunities.

Following the tone set by the green paper, alongside increasing the supply of affordable homes, the key messages for service teams were around enhancing both actual and perceived safety of homes and giving residents a stronger, more impactful voice in decision making. The Regulator and The Ombudsman will have a greater role in ensuring we put things right quickly when they go wrong, and the strengthened powers of both agencies are designed to make certain this 'culture' shift results in actions, not just conversations.

Sadly, the white paper also follows the lead set by the green paper in a few less commendable ways. Areas that don't go far enough include key topics for residents, such as tackling anti-social behaviour, domestic abuse, stigma and loneliness. Like many of you, I choose to work in social housing because I believe in our strong social purpose. Ensuring everyone (including the most vulnerable in society) have a roof over their heads, a safe place to call home and the support they need.



The occasional 'us, the residents' versus 'them, the landlords' tone in the paper is, I feel, unnecessary. Yes, residents in social housing have the right to have their voice heard and feel they are supported. And yes, landlords need to be 'held to account' – but this is by no means in opposition to what we are trying to achieve already; it's why we come to work each day.

Our new 'charter for social housing residents' gives us much to think about and a lot more to do. 2021 is going to be a year of review, and of increased partnership working with residents.

We hope this guide helps you get started.

A handwritten signature in blue ink, which appears to read 'Katy Wilburn'.

Katy Wilburn

**Head of Housing Research  
IFF Research**



# Key Takeaways

## Chapter 1: To be safe in your home

In the three and a half years since the Grenfell Tower fire, many of the building safety issues it so tragically brought into public awareness have already begun to be investigated and addressed. This chapter focuses more on rebuilding trust in building safety measures, and ensuring residents 'feel safe' as well as 'are safe'.



Building and home safety will become an explicit part of the redesigned consumer regulation standards. All landlords will need to have a nominated, publicly named person who is responsible for health and safety compliance.



There will be consistency in safety measures across the private and social rented sectors, with mandatory installation of smoke and carbon monoxide alarms, and an increased focus on electrical safety.



Landlords will need to engage residents of all tenures on safety issues. Two-way balanced engagement leads to trust which is key to 'feeling safe'. The accountable person for every high-rise building will be required to produce and action a resident engagement strategy to share safety information and allow safety concerns to be voiced.

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Social landlords have a key role to play in supporting their residents to feel safe in their homes. For residents, knowing you live in a safe, secure environment is of paramount importance, for your physical safety and for your mental wellbeing.

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## Chapter 2: To know how your landlord is performing

A key point of controversy in the green paper was the idea that landlords should gather standardised Key Performance Indicator (KPI) metrics which would be presented in publicly available league tables. For now, there is no suggestion of league tables, just more accessible performance information. The KPIs are back though.



The Regulator will develop a set of resident experience metrics which landlords will have to gather. They will follow the themes of the green paper around properties being in good repair, building safety, engagement and neighbourhood management - including measures on anti-social behaviour.



Once gathered, landlords will be required to share these metrics with residents in a standardised and consistent way - at least annually, but preferably on a continuous basis - using technology. Additionally, information on landlord performance must be easier to access, through a reduced 'freedom of information' request approach.





Alongside the new KPIs, landlords will also be required to publish expenditure data, and in particular, details of the Chief Executive and Executive Team salaries.



Each landlord will need to name a nominated person responsible for consumer standards compliance; someone suitably senior and identifiable to all, including The Ombudsman, The Regulator and residents.

Expect the Regulator of Social Housing to bring in a set of tenant satisfaction measures for all landlords on things that matter to tenants.

## Chapter 3: To have your complaints dealt with promptly and fairly

With The Housing Ombudsman's new complaints handling code having already been published and due to come into force in the new year, this chapter focuses on a strengthened working relationship between The Ombudsman and The Regulator, and the actions landlords must take to increase awareness of residents right to complain.



The long criticised 'democratic filter' (where residents must go through a "designated person" or wait 8 weeks before taking their complaint to The Ombudsman) is to be scrapped.

### Draft Tenant Satisfaction Measures

<b>Keeping properties in good repair</b>	Decent Homes Standard compliance. Responsive repairs completed right first time. Satisfaction with landlord's repairs and maintenance service.
<b>Maintaining building safety</b>	Compliance with health and safety obligations: including gas safety, electrical safety, fire safety, asbestos, water safety and lift safety Satisfaction with the health and safety of their home.
<b>Effective handling of complaints</b>	Number of complaints. Percentage of complaints resolved within agreed timescale. Satisfaction with landlord's complaints handling.
<b>Respectful and helpful engagement</b>	Number of complaints relating to fairness and/or respect. Satisfaction that their landlord listens to their views and takes notice of them and their landlord's engagement with tenants.
<b>Responsible neighbourhood management</b>	Percentage of communal areas meeting the required standard. Number of complaints relating to communal areas. Satisfaction with landlord actions to keep communal areas clean and safe. Satisfaction with landlord contribution to the neighbourhood associated with their home. Number of complaints relating to anti-social behaviour. Satisfaction with landlord's handling of anti-social behaviour.
<b>Overall</b>	Overall satisfaction with the service their landlord provides.



The Ombudsman's new complaints handling code will help ensure consistency of complaint handling by different landlords and also put greater emphasis on learning from complaints as a route to service improvement.



Complaints handling will be sped up, with The Ombudsman given powers to take action against landlords who are systemically unreasonably slow in handling complaints or are slow to provide information to The Ombudsman for them to review escalated complaints. The Ombudsman will also speed up their own case handling, reducing average case times to 3-4 months by March 2022.



From March 2021, The Ombudsman will publish online reports of complaints handled for each landlord as well as detailing the outcomes. On a quarterly basis they will also publish 'complaint handling failure orders' – naming the landlords and reason for failure.



The Regulator, The Ombudsman and the Government will lead a centralised awareness raising campaign of social housing residents' right to complain and the routes of objection open to them. Landlords will also be required to publish their complaints process both on their website and more widely, as well as raising awareness themselves of the complaints process.

## Chapter 4: To be treated with respect, backed by a strong consumer regulator for tenants

This chapter is all about the “new” consumer standards – still to be written by The Regulator - and the return to inspections to assess compliance with them, alongside continuing co-regulation.



The Regulator will review the current consumer standards and redraft them, including publishing an accompanying code of practice. This is likely to include requirements for landlords to publish policy on tackling domestic abuse, evidence how they have sought best practice to improve tenant engagement and an objective surrounding greater transparency.



“ We want to see a transformed consumer regulatory regime which holds landlords to account in maintaining good quality homes and services, prioritising safety, treating tenants respectfully and being transparent with information. ”



The “serious detriment” threshold for Regulator intervention will be scrapped and replaced by a four yearly inspection cycle. The inspections will be in the form of an annual desk-top review of the new KPIs and complaints (especially those escalated to The Ombudsman), four yearly inspections based on risk (considering the size of the organisation and those who house the most vulnerable i.e. specialist providers) and reactive investigations where non-compliance is suspected.



Landlords will be required to self-refer any breaches of the consumer standard to The Regulator. The cap on fines which The Regulator can impose will be removed, and Performance Improvement Plans will be introduced for failing landlords. Local Authorities will also be held to greater accountability for their management of ALMOs and TMOs.



The notice period The Regulator must give a landlord to survey the condition of their properties will be reduced from 28 to 2 days. Following completion of a survey The Regulator will be empowered to arrange repairs to homes and recoup the costs.

## Chapter 5: To have your voice heard by your landlord

‘Involved tenants’ should be a key part of any landlords governance and scrutiny arrangements. But beyond this, residents who don’t want to attend formal meetings or join a panel needs to have their needs identified and voices heard too. This chapter discusses the need to tailor engagement opportunities to residents needs and interests, encouraging and supporting greater involvement.



Building on the success of Together with Tenants, The Regulator will review if landlords have “sought out best practice” in resident engagement and involvement, and continually improved how they engage with residents.



To upskill residents who would like to be more involved in formal scrutiny and decision making, a Government-led learning and support programme will be made accessible to all residents of social housing.



To ensure residents are treated with care and receive the correct support from landlords, the Government will lead a working group to review professional training and development, including the need for mental health awareness training for frontline staff.



## Chapter 6: To have a good quality home and neighbourhood to live in

Much has changed since the Decent Homes Standard of 2001. Energy efficiency and decarbonisation are now top of many agendas, as are access to green space for the benefit of wellbeing, encouraging community integration through good design and tackling community issues such as anti-social behaviour and domestic abuse. This chapter reconsiders what a good home should mean and how landlords should tackle neighbourhood issues.



The Decent Homes Standard will be reviewed by autumn 2021, to decide if it needs to be updated. The review will consider energy efficiency and decarbonisation, access to green spaces and access to communal space.



Linking back to the KPIs mentioned in chapter 2, the specific inclusion of 'satisfaction with anti-social behaviour' handling has relevance here too, with landlords having to report how they are performing in this area, and be challenged on this as necessary by The Regulator.



The Government will clarify the responsibilities of landlords and the police in directly tackling anti-social behaviour, so residents understand where to access support and what to expect in terms of a response, including greater clarity around the availability of Community Trigger or multi-agency ASB Case Review arrangements.



The new regulatory consumer standards will include requiring landlords to have a policy to tackle issues surrounding domestic abuse.





The green paper included an evidence collection exercise, gathering data on how allocations processes were working in different areas. This review will also aim to ensure people with disabilities are allocated suitably adapted and accessible homes.

## Chapter 7: To be supported to take your first steps to ownership

The final chapter focuses on increasing supply of affordable homes, and in particular, redesigning the shared ownership model and introducing the 'Right to Shared Ownership'.



Half the homes delivered under the Affordable Homes Programme (up to 180,000 homes, scheduled to run until 2028/29) will be for social or affordable rent with the other half affordable homeownership.



The new shared ownership model will reduce the minimum initial stake from 25% to 10%, allowing owners to staircase in increments of 1%. Landlords will also now have to cover repairs for homeowners for the first 10 years.



The new right to shared ownership model will give residents the opportunity to buy a 10% stake in their home and become a shared owner, staircasing as under the main shared ownership model.





# Key Actions for Landlords

Every high-rise building will need a resident engagement and information sharing strategy in place, and the accountable person for every high-rise building will need to understand and effectively action this strategy.

- Consider how you will ensure all high-rise residents can access key safety information?
- What format will you supply this information in? Will it need to be translated, provided in braille or large print? How will you ensure it's provided to all new residents, reviewed and kept up to date?
- What mechanisms do you need to put in place so high-rise residents can quickly, easily and effectively feedback any safety concerns?
- What systems do you need to put in place to ensure concerns are recorded, appropriately escalated and the resident receives feedback on how their concerns were investigated, and what actions if any were taken?

All landlords will need to gather the KPIs The Regulator determines, and Chapter 2 provides clear indications of what these metrics will focus on.

- How will gathering these KPIs fit into your current customer experience monitoring strategy?
- If you have them, you might want to review your current customer experience surveys. Do you have surveys that these metrics could be added into or do you need to consider gathering them separately?



- Are you collecting any of the proposed KPIs already? If so, how are you performing on these metrics in comparison to your peers?
- Would it be useful to collect a baseline measure of your performance in these focus areas now, so you know how you will compare?

**Alongside the customer experience metrics, all landlords will also have to publish key expenditure data such as the wage level of your CEO and Executive Team.**

- Do you know how your organisation will benchmark? Do you need to gather data on how your CEO and Executive teams' salary compare to other similar landlords?

**All landlords will need to name a senior individual in their organisation to take on the role of ensuring consumer standards compliance.**

- Consider where this role would naturally sit within your current organisational structure.
- Who should take on this role? And what advanced training, support and guidance might they need to feel prepared and ready for this new responsibility?



**With The Housing Ombudsman's new complaints handling code coming into force in the new year, if your organisation hasn't already, now is the time to complete your self-assessment against the new code - due before the end of this year.**

While completing this assessment, consider:

- Retrospectively analysing complaints data to understand what drives complaints. What are the most common complicating factors? What service standard, process or guidance changes have been made as a result of previous complaints? This documentation will be needed to provide evidence of learning to The Ombudsman.
- Both the new complaints code and the newly proposed consumer standards annual desktop review are likely to put strong emphasis on complaints as a form of customer feedback and viewing complaints as a learning opportunity. Documenting how this learning is already being actioned may save future effort.

**In addition to four-yearly inspections focusing on compliance with the new consumer standards, landlords will also be required to conduct an annual desktop compliance review.**

- Consider conducting a mock desktop review now against both the current consumer standards and the newly proposed elements to identify and action any key gaps.

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A new risk-based programme of routine inspections will prioritise those providers that the desk top review has identified as high risk and will seek assurance about those landlords' compliance with the consumer standards.

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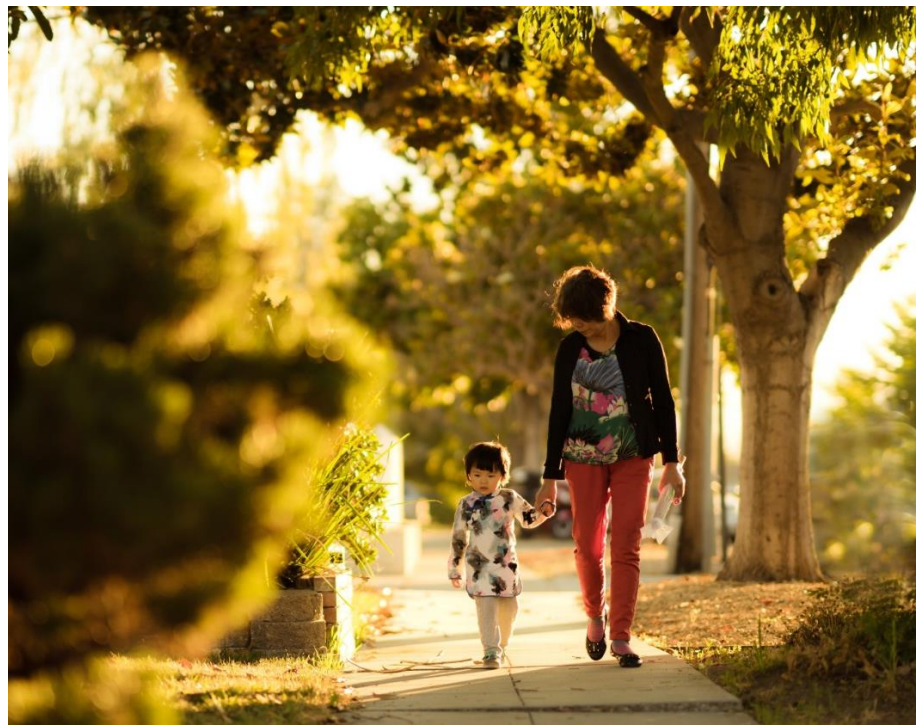
- If you already gather any of the proposed KPIs, how does your performance compare against your peers?
- Do you have a published policy on tackling domestic abuse?
- Do you currently direct residents who experience ongoing anti-social behaviour to the multi-agency ASB Case Review process? Does this signposting work effectively? Can you evidence this?

**As part of the new consumer standards, landlords will be expected to evidence that as an organisation, you have sought out new ideas and best practice, to continually develop and improve tenant engagement opportunities.**

- Ask yourself the difficult question: "Can we honestly say we have done this?"
- Review your current tenant involvement strategy and approach. Start documenting how this has evolved and grown over time, the impact these changes have had and how you plan to grow in the future.
- If you haven't already, follow Together with Tenants, the See the Person campaign, and read the National Housing Federation's new resident engagement charter.

**Finally, with 50% of the new Affordable Homes programme being used to build shared ownership homes, shared owners are going to become a more substantial sub-group of the sectors' customer base. However, as any customer insight manager will tell you, as a resident group they are often highly dissatisfied with the services they receive.**

- Analyse and interrogate the drivers of shared ownership dissatisfaction in greater detail. What are the key issues? Will they be addressed by the new model of shared ownership? Or do you need to rethink the service model to shared owners more broadly to avoid acute dissatisfaction in a growing customer base?





# Lacking the resources to respond?

## We can help.

To find out more about how we help landlords monitor satisfaction, meet regulatory requirements and benchmark against peers, contact us today.



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