



**A new deal for social housing – Social Housing  
Green Paper consultation:  
HQN response**

**NOVEMBER 2018**

## Introduction

HQN provides high-quality advice, tailored support and training to housing associations, councils, ALMOs and other housing providers. Its main membership network, The Housing Quality Network, and eight topic-based specialist networks focus on best practice across the housing sector.

We very much welcome this consultation and the opportunity it presents for the sector to take stock and move toward better relationships between landlords and residents, higher standards and improved safety. In preparing its response to the Social Housing Green Paper, HQN conducted a member survey on key areas of the consultation, and held a series of events around England in partnership with the Ministry of Housing, Communities and Local Government (MHCLG) to enable participation in the debate. Professionals, board members and residents took part. This response reflects opinion from this wide range of participants. We hope that the changes the Green Paper heralds will bed in quickly across the sector, to better build in resilience should any economic downturn bring further austerity measures.

We have focused on a small number of key themes in the consultation and section numbers follow those in the Green Paper.

### 1 – Ensuring homes are safe and decent

A theme running throughout our discussions has been trust – and the lack of it. The Grenfell tragedy rightly sharpened and gave urgency to safety issues from both residents and landlords. As the consultation notes, the Hackitt Review correctly identified residents’ ‘important role to play in identifying and reporting issues that may impact on the safety of the building and in meeting their obligations, including co-operating with crucial safety-related works, to ensure their own safety and that of their neighbours’.

This combination of rights and responsibilities was reflected in our discussions, and it was apparent that rebuilding trust would be key to success in ensuring safety. Residents want clear information and to know that their concerns and reports are taken seriously. Landlords need to know that they will be able to gain access, for example for gas checks, and that residents will equally act responsibly to minimise danger. In summary, listening to and understanding each other should come first, with efforts to get clear messages out on safety, and legal backup where needed. Publicity campaigns, particularly generated locally, could help to keep everyone focused on their responsibilities for safety.

*“We operate locally with offices on estates which makes it easier to listen to customers and act quickly”* – survey participant.

Participants in our events felt that gas and electrical requirements in the private rented sector should also apply to social housing. Some wanted checks to go wider than fire and gas, extending to asbestos and general stock condition.

On Decent Homes there were mixed views, with some wanting a revamp to include security, energy efficiency and a generally higher standard, or even a neighbourhood standard, while others felt it was already too prescriptive.

*“I am embarrassed by the Decent Homes Standard (DHS). I honestly don’t think it’s anything to be proud of. It does the bare minimum”* – event participant.

## 2 – Effective resolution of complaints

Only a small minority of our participants thought the current complaints framework was up to scratch. There were repeated negative comments on the ineffectiveness of the democratic filter and the long timescales involved, particularly with complaints that reach the Ombudsman.

Some tenants were unhappy with what they see as lack of clarity on what actually constitutes a complaint, as some organisations treat a first contact on an issue as a ‘request’ for action rather than a formal complaint. However, many people pointed to the strong advantages of dealing with complaints or dissatisfaction at the first opportunity and wherever possible, de-escalating the issue by resolving it quickly to the customer or resident’s satisfaction. This can avert the need to escalate to formal complaint level.

In broad brushstrokes, there was support for fast resolution of complaints, removing delay or confusion that can arise via the democratic filter, and better resourcing of the Ombudsman service to reach a conclusion faster.

Tips on good practice from our survey and events included:

- *“Dealing with complaints at source and empowering staff to resolve them”*
- *“We’re trying to empower our frontline colleagues to deal with complaints as soon as they come in... we need to change the culture around them”*
- *“Independent tenants’ complaints board”*
- *“We visit with outcome of investigation and again this opens up an opportunity for the customer to respond face to face, and hopefully for us to ensure we achieve overall satisfaction... our complaints are also linked to capturing learning outcomes and what we have done to adjust to ensure it does not happen again.”*

### 3 – Empowering residents and strengthening the regulator

This section represents the core of the Green Paper and has brought lively debate among HQN members.

We believe that as performance indicators (PIs) are set to become a feature of regulation and wider accountability to residents, it follows that league tables of organisations will be compiled – whether officially or otherwise. A question frequently raised by our members is ‘what happens then?’.

Our events have debated a number of measures of customer satisfaction, including independent random surveys and ‘friends and family’ tests. However, as Mori found more than a decade ago, ‘external factors limit social landlords’ ability to increase the level of satisfaction in their area, and this therefore needs to be taken into account when judging performance and setting targets’.<sup>1</sup>

As many have said, not least the Audit Commission in the previous decade, PIs can only be the starting point: they are open to circumstance, interpretation, gaming, and pure error. We believe, therefore, it is essential for some authority to make a visit – see the estates, talk to residents, reality-check the figures and form a rounded view of the situation. That opens a role for peer reviewers, the regulator, and above all resident organisations (such as the National Tenant Voice) to become a new form of inspector. Whatever form review or inspection takes, it must be to clear standards and must be cost-effective:

- *“I would like to see very focused inspection around the consumer standards. Potentially spot-checks where tenants talk directly to the regulator”*
- *“We don’t want ‘death by inspection’”*
- *“Tenant inspection works”*
- *“It’s about the power balance with tenants, we need to change that”*
- *“It’s about what benefit – was the service better [under inspection]?”*

On consumer regulation and the consumer standards, many participants said they wanted a ‘C’ rating alongside the ‘G’ and ‘V’ ratings used by the regulator. Serious detriment had clearly failed as a standard to trigger action and needed to be replaced. Some wanted a version of the old Key Lines of Enquiry to set out clearly what ‘good’ looks like. Others were wary about the resource required, and the possible generation of a compliance culture:

- *“You should be able to demonstrate to regulator that you’ve acted appropriately. So not too much prescription”*
- *“The point is, did something material change [as a result of standards]?”*
- *“The standards are the most basic level, not something to aspire to.”*

Governance and finance will of course continue to require regulatory oversight, and will need to be aligned with any new consumer tests or standards. One possibility would be to hold back a percentage of grant funding for those achieving well on consumer standards; while data from existing returns, eg, patterns of spend on maintenance, could be used to drive a programme of consumer tests for large developers.

#### 4 – Tackling stigma and celebrating thriving communities

Some participants found the notion of stigma difficult to debate, because they felt residents do not feel stigmatised by living in social housing. In fact, some sought to reframe the debate by challenging government ideas on social housing as a ‘springboard’ or ‘safety net’ and the emphasis on homeownership as more desirable, which they said in themselves created stigma:

- *“It’s patronising rubbish”*
- *“People don’t define themselves by where [what tenure/landlord] they live.”*

Nevertheless, some did acknowledge stigma in processes such as allocations and lettings, suggesting people were told they were ‘lucky’ to be in social housing. The phenomenon of ‘different names and different doors’ for social housing in mixed-tenure developments could reinforce stigma, some felt. Aesthetics of estates also played a part, and many felt the positives should be celebrated more.

Several participants in our events related questions over performance measurement in the previous section to local and neighbourhood issues. Landlords were finding it increasingly difficult to offer wider services in support of individuals or neighbourhoods and in tackling anti-social behaviour when faced with budget constraints, reductions in neighbourhood policing and reductions in social services:

- *“There are far more mental health issues [than before]. Activities are seen as ‘additional’ but are actually core to helping someone sustain their tenancy”*
- *“Many do the minimum to stay out of trouble rather than solving problems for the victims”*
- *“We provide many learning and work opportunities to support people in gaining confidence and ultimately employment, in partnership with DWP and NHS”*
- *“Funding residents to organise their own events. From a resident initiative, developing an informal group model for local residents to organise.”*

Clearly, the aspiration to offer residents the broadest range of high-quality support and neighbourhood management, in combination with other public services, relies on appropriate shared resources being available.

On professionalism, there was widespread support for working to improve this across the sector, as well as for trying to boost the value accorded to housing professionals. A key aspect was quite simply to ensure staff treat residents well: several participants said this was more important than quantitative aspects of service such as waiting times. Appropriate, up-to-date training is regarded as important.

## 5 – Expanding supply and supporting home ownership

Everyone is acutely aware of the crises of housing supply and affordability in the UK. For many, we do not need to look for complex answers because the remedies are the obvious ones of resources and land.

- *“We’re being more inventive about where we build but brownfield can cause all sorts of problems and costs”*
- *“It’s not just about more but about what is built. What’s affordable. How can people working afford even affordable rents? Where’s the oversight to ensure we get the right homes, in the right places?”*

Shared ownership attracted both positive and negative comment. Several participants were concerned that it represents the ‘worst of all worlds’ while others saw it as a valuable niche product. With lower satisfaction rates reported in shared ownership, the tenure needs to be included in the drive for higher customer and neighbourhood satisfaction:

- *“The idea of people staircasing in very small amounts concerns me a great deal”*
- *“It is good for people whose circumstances have changed (for example, marriage breakdown).”*

Developing landlords naturally wanted more freedoms and flexibilities to deliver the homes that are much needed.

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<sup>1</sup> Frontiers of Performance in Housing, June 2006, Ipsos Mori

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