



Breaking the mould

**Working together for
social housing of the future**

A response by Acis to the government's 2018
social housing green paper

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Introduction

The government's social housing green paper – A new deal for social housing – was published in August 2018.

The green paper focused on five key themes:

- **Ensuring homes are safe and decent**
- **Effective resolution of complaints**
- **Empowering residents and strengthening the regulator**
- **Tackling stigma and celebrating thriving communities**
- **Expanding supply and supporting home ownership**

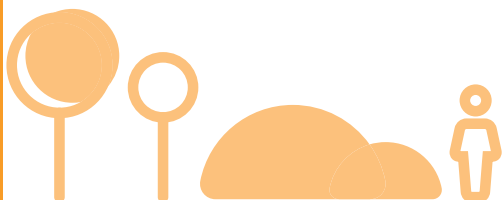
As a housing provider currently owning and managing over 7,000 properties in the Midlands and North of England, spanning 14 different local authority areas, we officially responded to the paper through the government's consultation exercise. Of the 48 questions posed by the government in the green paper, we responded to 40. These represented the most appropriate themes relating to our history, current activity and proposed work, and more importantly which matter most to the people organisations like us are here to support – our customers.

Responses, led by our senior leaders, our Board and frontline teams, were formed through consultations with our customers through our Local Management Board, Tenant Led Scrutiny Panel and our insight survey, providing us with feedback from more than 250 customers.

Our responses include relevant supporting evidence, including from our 2018 research report 'More than bricks', which explores the need for housing providers to deliver support services, survey results and recent performance data.

In addition, we have also engaged with and fed into other responses, including TPAS, the Chartered Instituted of Housing, the National Housing Federation, and the Research Users In Housing (RUSH) network.

In this document, produced shortly after our official response was submitted, we explore our thoughts and reasoning behind our replies. We hope it will be a catalyst to open up further conversations with our existing partners and help to develop new avenues for partnership and growth moving forwards.





Executive summary

Ever since its introduction, social housing has provided a stable base supporting people when they need it. It's imperative these homes provided are safe and decent. If they aren't, that's where any perceived stigma may start.

In the aftermath of the Grenfell tower tragedy, safety was always going to be a main theme running through any reforms in the sector. However, this was on the agenda before what happened in 2017. Safety isn't just about fire doors and cladding, and decency isn't just about new kitchens and bathrooms. It's much wider than that and any regulation or guidance needs to be updated to modern expectations.

Our customers - tenants and residents - are why we're all here. We are here to provide a service to them, so it's important they have a strong voice. They should be able to influence our delivery and challenge us to improve our performance. Providers should be doing all they can to deliver quality services in the first place – going above and beyond what people may think a social housing provider is here to do.

Giving influence to the customer requires them to have access to up-to-date information, including performance figures. But this needs to be data that makes sense to them and their lives. How that information is presented is key as, with more than 1500 organisations in the sector, comparing one provider to another might be akin to comparing apples with pears.

We support the government's ambitious housebuilding agenda and are continuously growing our stock with a mix of different tenure opportunities available. However, one area that our experience really differed from the views expressed in the green paper was around stigma, where social housing tenants felt stigmatised like 'second class citizens' and treated as an 'underclass' and 'benefit scroungers'. While we believe the portrayal of the sector is out of touch, our research tells us that our customers are proud to be social housing tenants and that they feel equal to those who own their own home. What's more, most surveyed don't have an aspiration to own their own home.

It's right that the sector is reflecting on the state of play, but any reforms need to be flexible enough to allow providers to do what's right in the areas that they know best. We all want to do our best, but a one-size-fits-all approach won't work. And, as always, funding to grow, to build and to diversify, will remain key if we are to be successful in achieving our ambitious goals.

Our response considers all five key theme areas. And whilst some decisions are now with government to determine and implement, there are others in which the sector can have an impact. Through compiling our own response we feel there are three key areas that we would like to explore further with other social housing providers, these broadly include complaints, customer engagement and social value.



Chapter one:

Ensuring homes are safe and decent

The Decent Homes Standard is a minimum standard council and housing association homes should meet.

Homes must:

- be free from any hazard that poses a serious threat to health or safety (for example, persistent damp or poor electrical systems),
- be in a reasonable state of repair,
- have reasonably modern facilities (for example, kitchens and bathrooms under 30 years old), and
- have efficient heating and insulation.

The current Decent Homes Standard is very basic and we, like many organisations, have self-determined what our customers want and regularly go beyond what is legally required - a kind of Decent Homes Plus if you like. Although our intentions are good, by doing this we can cause a confusion for both our customers and our employees as to what we should be providing. And while we will always want to do more, we have to balance this with budgets. Safety of course is paramount. The Grenfell disaster was felt by everyone. Not only do we need to ensure our homes are decent, but first and foremost, safe – preventing any such disaster ever happening again.



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

Customers should expect clear and educational information to be available to them in different formats, confirming what can be expected from providers and when. Providers should be working proactively to identify particular needs and making bespoke arrangements where necessary.

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

Yes. The current Decent Homes Standard is quite rudimentary and is mainly concerned with the cyclical replacement of components. It does not provide qualitative guidance which would be beneficial.

Providers should have the ability to self-determine what customers want, having regard to what is affordable and with the scope to balance expectation. We, like many organisations go above the current basic standard and invest more money into our properties than we legally need to.

We should also recognise the standard of the external environment too, including common and environmental areas. Something not covered by the existing Decent Homes Standard.

And where does it end? When we think about decent homes, we include the external areas too such as communal hallways and shared gardens. To support with we have invested £440,000 since 2016 to keep these areas to a decent standard. This has included improvements to sheltered schemes, car parking and fencing. In addition to this we're currently investing a further £400,000 into fencing and boundary works across our Sheffield estates in direct response to customer demand and feedback.

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

Yes. Safety is unequivocally a massive issue and qualitative measures could helpfully be introduced alongside existing statutory provision to support consistency. Providers should be focused on the future, looking at potential issues on the horizon rather than solely focused on the issues that have already occurred.

There is logic to strengthening, via statutory duty, the obligations to undertake electrical periodic inspections on a five yearly cycle and to install smoke alarms in properties as existing within the private rental sector.

However, as per our response above, such obligations do need to be properly funded.

We are currently moving to a five-year programme of electrical testing, which is recognised as best practice within the whole rented sector. We are already installing hard-wired fire alarms where they are not present – going above and beyond the current legal requirement.

There are also questions about where 'safety' stops. For example, does it include safety issues associated with antisocial behaviour as questioned during our customer consultations? Any guidance should recognise but not necessarily prescribe on matters such as this, which should be guided by individual situations.

Warmth of homes is also a huge topic when talking about safety and decency. We are also already providing energy efficiency guidance around each of our homes, have strengthened our communications around gas safety and support for customers to manage their energy as best as possible.

We feel that if the Regulator was to review the Decent Homes Standard, it is clear that there would need to be customer involvement in its new design, together with a cross section of other Registered Providers.

Chapter two: Effective resolution of complaints

Like many providers, we operate a three stage complaints process and have implemented internal mechanisms to ensure we are responding within strict timescales.

Should a complaint move through all three stages and remains unresolved, the complainant is then able to take it to a 'designated person'.

The 'designated persons' democratic filter was introduced by the government as part of the Localism Act 2011 to improve the chances of complaints about housing being resolved locally and to involve local politicians and local people in resolving local housing issues. A designated person can be an MP, a local councillor, or a tenant panel.

We try to recognise a complaint at the earliest possible opportunity and offer guidance throughout the process, however we know our customers expect more and feel this is an area that could benefit from further clarity and support.



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

We believe the designated persons democratic filter should be removed completely. In our experience, this filter has proven to be of little value in complaint resolution. The effective and consistent operation of designated persons might be easier for providers who work in a very localised area, however as we work across 14 different local authority areas and there are, and always will be, varying degrees of stakeholder relationships. In our areas, despite being publicised, it is not being used.

What can we do to ensure the 'designated persons' are better able to promote local resolutions?

As explained in our answer above, we believe this part of the process should be removed. The designated persons process is well intended but our experience is that it is not well used. As shown in the table below, only a handful of our complaints have been escalated to stage 3 of our process over the last two years.

	2016/17	2017/18
Stage 1	106	154
Stage 2	8	10
Stage 3	2	2
Compliments	68	136

Our experience is that if a customer is still dissatisfied at the end of stage 3, they will want to proceed swiftly to the Ombudsman rather than going to another level of perceived bureaucracy.

Some customers may also be circumnavigating the process in that MPs and councillors may already be involved in a complaint from an early stage as part of an informal route to raising a concern. As such, we have now developed a clear process to ensure this is as quick and effective as possible, including the implementation of a new email mailbox and executive oversight of all MP and councillor enquiries.

We feel the designated persons stage puts an extra layer on the process, whereas we could work expediently through our own processes at a quicker rate. However, we would welcome any guidance, including real life examples, of where this has worked well in similar areas.

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

Customers should have easy access to simple and clear information that sets out how and what can be expected in terms of responses and timescales to help clarify what constitutes a service issue and what constitutes a complaint.

Customers asked in consultation with this response said that they would like information about how to complain if something went wrong, and also that they would like to see us spending more time on the estates, supporting vulnerable, elderly, or disabled tenants to make a complaint should they wish to.

We make sure our complaints process is clear and visible on our website, and we talk about the results of complaints in our Annual Report to Tenants, which is delivered to each home every year.

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

Our customers have told us they should receive details of an independent organisation, such as Citizens Advice, that can advise on complaints matters. While it is understood that providers generally signpost to other agencies and advocacy services, there could be a requirement to include this in policies, procedures and practice.

Last year we saw an increase in the number of stage one complaints, however overall there was a 1% decrease in the number of complaints escalating to stage 2. We know we have some service areas we need to improve upon and are actively working hard to do this, however last year we also recommunicated our complaints process to all our teams, together with reviewing

our feedback policy. The purpose of doing this was to ensure our people are able to better identify complaints and resolve them at the earliest possible opportunity.

We believe there should be a simple, consistent approach to handling complaints which should be regulated.

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

'Fast and effective' will mean different things to different people, but a prescribed minimum regulatory standard to include clear timescales and consistency of approach would support this.

We believe prevention is better than the cure. We are introducing new digital features to help customers report issues with their homes and tenancies, which should speed up remedial process – hopefully before issues turn into complaints.

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

The Regulator and providers themselves should encourage self-reporting and whistleblowing with prompt, thorough investigation and actions agreed in direct conjunction with Boards.





Chapter three:

Empowering the residents and strengthening the regulator

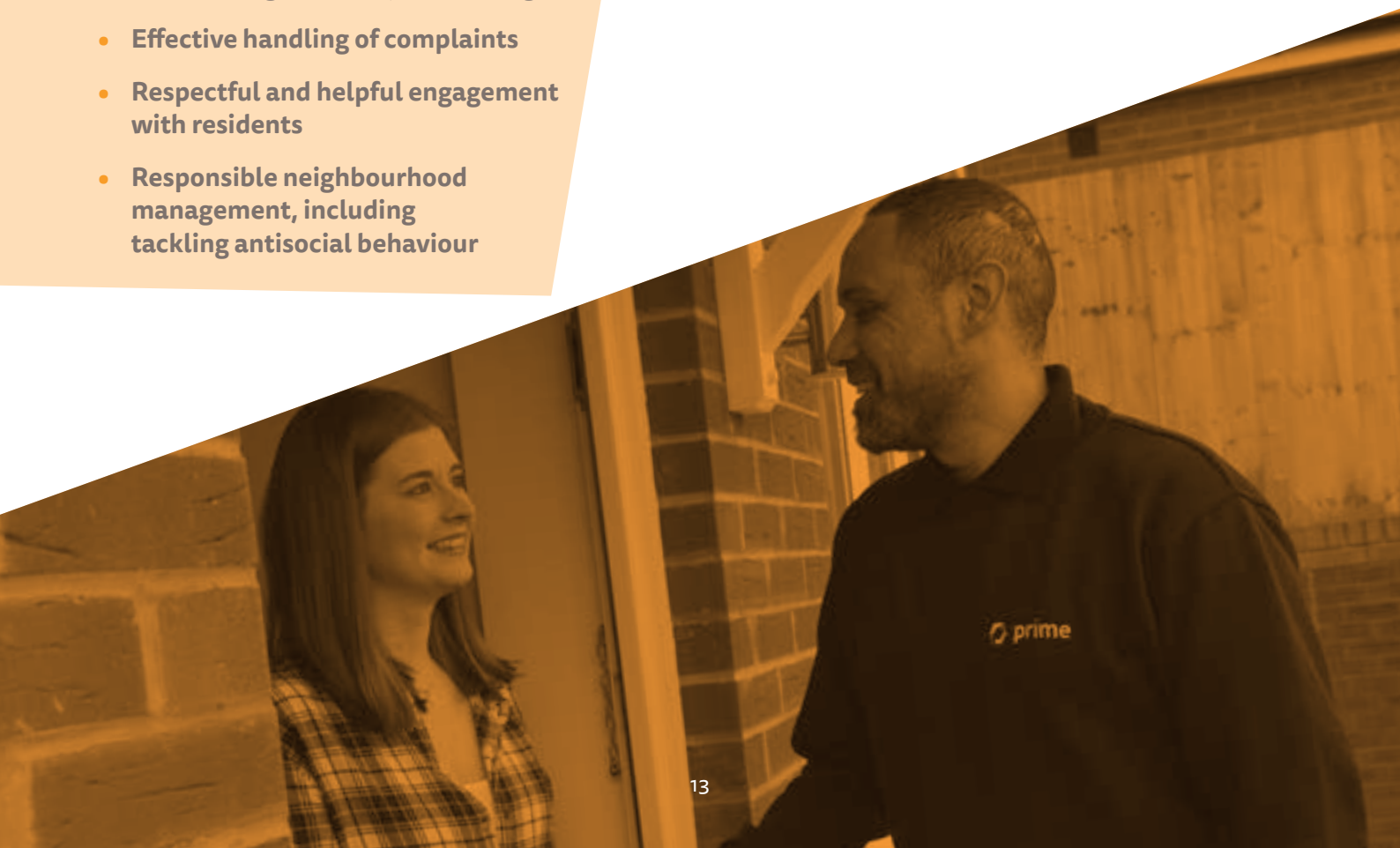
We believe it's important that customers are able to compare provider performance more easily and we want to support this as much as possible. We agree that performance data needs to be published in a clear, regular and consistent format however feel much more clarity of the proposed key performance indicators (KPIs) is required.

Something that may be more difficult than deciding what the KPIs should be is finding ways in which all providers can measure accurately and consistently across the board, with flexibility to ensure all customer groups are able to feed into and understand the outcome.

We feel using the results of these KPIs to feed into a league table which then forms part of funding criteria would not work. It would become a barrier to the increase in affordable housing and result in only certain areas seeing new developments taking place.

The government's proposed KPIs are:

- 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 antisocial behaviour



Do the proposed Key Performance Indicators cover the right areas? Are there any others?

No. The KPIs outlined within the green paper are obviously headline and lack enough detail to enable us to draw a meaningful conclusion. For example, what constitutes respectful and helpful engagement, and should this engagement be community-driven as opposed to customer-driven?

We also feel that there are other key areas not mentioned as part of the proposed KPIs, such as social value and the wider impact a provider has on a community.

There is an obvious requirement for absolute clarity of definition of any metrics to ensure consistent reporting and the avoidance of any creative interpretation. It should be noted that the methodology of measurement of many KPIs across the sector is currently inconsistent, so this would need to be looked at closely when setting any formal KPI. Perhaps this will present more of a challenge than deciding upon and setting the proposed KPI.

Should landlords report against these every year?

Yes. There should be a mandatory requirement to report on formal KPIs, but this needs to be to prescribed measurement methods and the results would need to be independently audited.

Should landlords report on this to the regulator?

Yes, but more importantly providers should be required to report transparently to customers, identifying areas of good and bad performance and improvement plans where appropriate. The method of reporting these to customers however should remain flexible and enable

providers to deliver it in a way that works best for their customers and communities.

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

While we believe that providers, like ourselves, are generally transparent, consistency could be ensured by clear prescription of minimum requirements for publishing such as performance, standards, and policies.

We try to communicate as many useful performance indicators as possible to our customers throughout the year, through our website, our social media channels, our Annual Report to Tenants and our regular magazine delivered to all our customers. We know these communication channels work best for our customers.

Do you think there should be a better way of reporting the outcomes of landlords complaint handling? How can this be made as clear as possible for residents?

Yes. In addition to the speed of consideration and response, providers could be required to publish a 'you said, we did' outcomes so not only is it clear what complaints have been about, but also what has changed as a result.

Through consultation with customers it was suggested that this reporting should be done in plain language – we are proud to be a member of the Plain English Campaign and the people responsible for communicating are all trained in plain English.

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

If national metrics are to be developed, the Regulator should work very closely with customers and providers to ensure any indicators are meaningful and can be measured consistently, as outlined previously in this chapter. Alternatively, indicators should be developed at a local level to reflect circumstances and priorities.

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

Establishing precise definitions for any metric used would be a good starting point for this, alongside a prescribed reporting format with clear supporting guidance for customers to fully understand what is being presented.

It should be noted that satisfaction can be a highly subjective area. In other sectors such as retail, a satisfaction score of 75% would put organisations at the top of the leader board. Equally, to some customers a satisfaction score of 90% could feel low. We believe the sector could benefit from some clarification on this, and perhaps this would be of more use than a league table. By defining what is considered a 'good' score within the sector, customers would be able to make an effective comparison of performance.

Through wider consultation, it is clear that tenants do not feel league tables provide any clarity or route for effective comparison. Many raised concerns that the introduction of league tables would drive the wrong behaviours, providers would focus on activity that would improve their positioning rather than what really matters to customers.

Should we introduce new criterion to the Affordable Homes Programme that reflects residents' experiences of their landlord? What other ways could we incentivise best practice and deter the worst, including those providers who do not use government funding to build?

We believe new criteria does not need to be developed. If the government is serious about wanting the sector to increase the provision of new affordable homes then funding should not be allocated based on league tables, particularly as they have the potential to drive the wrong behaviours. What's more, the worst in the league tables could get worse, and the better get better and lead to a lot fewer housing associations in the sector as mergers and acquisitions rise. That's not always the best for customers, who may see an even poorer performance.

This could also hurt future customers harder than providers, leading to certain geographical areas with fewer providers able to develop new homes.

It is suggested that an obvious criterion for development funding is the need for ongoing or further investment within that location.

The KPIs outlined in the green paper are reasonable, but not solely demonstrable of how providers can deliver for the community. Customer satisfaction is a good measure, however resident experiences of landlords cannot be reliably measured across the sector. Current arrangements are not robust enough to compare providers on a like-for-like basis.

We agree that incentivising is not the right answer and consider that regulatory arrangements should suffice. Best practice from across the sector could and should be more proactively promoted to help providers deliver the best possible results.

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?

The picture will vary across providers and influenced by geography, resources and structures but on the whole, we don't believe that current engagement and scrutiny measures are effective.

A one size fits all approach will not work. A local approach should be devised and promoted, possibly underpinned by some minimum prescription. We have seven different ways customers can get involved with us – from giving feedback to having their say at Board level. We have a good framework of customer engagement activities but it's often hard to get customers to be engaged and this is something we're working on. And although we are members of TPAS and other bodies doing similar work, we would welcome



opportunities to learn from best practice around the sector.

A national framework, which allows for a local approach, could be developed and promoted accordingly. Our new engagement model has already helped us to change some of our services in line with what customers are telling us they want. This has recently included our out of hours service offer, and the planned implementation of a customer portal. However, to maximise engagement we need to ensure these successful changes continue to be communicated to both our customers and our frontline teams.

Is there a need for a stronger representation for residents at a national level?

Yes. National and even regional representation could create opportunities to influence policy and operational matters on key related issues.

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

Without full details, it is difficult to offer an informed view on what additionality these would deliver. However, anything that increases the awareness of what we do and to help shape our success – and to demonstrate the understanding of the constraints we work under – would be a good thing.

As a customer-focused organisation, we welcome customers being involved at a leadership level

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

A menu of services could be offered for customers to choose from. In blocks of flats and sheltered schemes particularly, we already give them the power to choose the services that they receive from us.

Going further, costed packages – potentially categorised as bronze / silver / gold could be presented to customers and help them understand the investment that goes into services. This could potentially be done on an estate or house-by-house basis too, but would be very complicated and not always provide the best value for money. More likely a consensus would be needed to ensure we continue to deliver value for money. Incentives could also be used to aid value for money services. For example, if a customer had limited repairs, they could get a discount on contents' insurance. However, providers would need to strike a balance to ensure there would be no issues with non-reporting.

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?

It is a nice idea, particularly in blocks of flats or sheltered accommodation schemes but it's a big step. Relying on residents to deliver their own services could work, but strict contingencies would need to be put in place to guard against homes and areas falling into disrepair. For example, if the people responsible for works are on holiday or fall ill.



How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and Value for Money (VFM)?

We fully agree that customers should be more involved in the procurement process and trained to help support decision makers. Customers can be engaged through:

- Service specification
- Tender evaluation
- Contractor interview and appointment
- Contract management meetings or review of performance directly with contractors
- Direct regular inspections of service delivery
- Oversight as part of scrutiny arrangements

Our customers were heavily involved in the procurement of our latest grounds maintenance contractors. Customers were involved in the designing and final sign-off of the specification, they formed part of the interview panel and contributed to making the final decision.

However, in our experience, it is difficult to get tenant representative panels involved, and where it is possible, it is the same people time and time again – not necessarily reflecting of the whole customer base across the scope and geography of work.

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 tenants in line with new KPIs proposed, and if so how?

Broadly yes. A requirement for significant change is not apparent but, as previously outlined, we would welcome some further clarity to fully understand what KPIs may be required from providers.

Existing consumer regulation objective and consumer standards

Parliament has set the Regulator of Social Housing a consumer regulation objective, which is:

- to support the provision of social housing that is well-managed and of appropriate quality;
- to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection;
- to ensure that tenants of social housing have the opportunity to be involved in its management and to hold their landlords to account; and,
- to encourage registered providers of social housing to contribute to the environmental, social and economic wellbeing of the areas in which the housing is situated.

The Regulator has published four outcome-based consumer standards to deliver the consumer regulation objective. These are:

- **The Tenant Involvement and Empowerment Standard (July 2017)** which includes a requirement for landlords to provide choices and effective communication of information for tenants on the delivery of all standards, and to have a clear, simple and accessible complaints procedure;
- **The Home Standard (April 2012)** which requires homes to be safe, decent and kept in a good state of repair;
- **The Tenancy Standard (April 2012)** which requires registered providers to let their home in a fair, transparent and efficient way, and enable tenants to gain access to opportunities to exchange their tenancy; and,
- **The Neighbourhood and Community Standard (April 2012)** which requires registered providers to keep the neighbourhood and communal areas associated with the homes that they own clean and safe; help promote social, environmental and economic wellbeing in areas where they own homes; and work in partnership with others to tackle antisocial behaviour in neighbourhoods where they own homes.

Should the regulator be given more powers to produce documents, such as a Code of Conduct of practice, to provide further clarity about what is expected from the consumer standards?

Yes. This would help to confirm the minimum standards providers should be working to. We welcome and support the charter being developed by the National Housing Federation. However, all providers are different and should always be given flexibility to respond to local circumstances and customer requirements.

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?

Yes, though while it is an appropriate threshold, it should be recognised as reactive and after the event. An early warning system, like traffic lights of green/amber/red, would serve to support more proactive prevention, with self-assessment and reporting expected of Boards.

It is likely that 'serious detriment' will be expanded to include gas safety, electrical testing and even asbestos removal. But the threshold for landlord responsibilities has to be drawn somewhere.

Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use KPIs and phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?

Yes. A traffic light system, as explained in the previous question, could identify problems earlier and allow situations to be targeted and remedied earlier via a phased intervention. However, intervention should only be considered in the event that a provider's Board is unable to demonstrate appropriate levels of planning and governance in order to address areas of poor performance.

As previously explained, the challenge for the Regulator is to find consistently applicable measures for provider performance. Too much regulation could see housing associations be hamstrung and not do what's right for their customers. KPIs need to be relevant to the people they serve.



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

Yes. However, depending on their level, financial penalties might not solve issues or deter providers if they feel that the risks are worth taking or that the profits gained outweigh any potential fine.

Key regulatory and enforcement powers of the Regulator of Social Housing

Power	Applicable to private registered providers ^a	Applicable to local authority landlords
Survey to assess the condition of stock	✓	✓
Inspection to establish compliance with the regulatory requirements	✓	✓
Hold an enquiry where it suspects landlord mismanagement	✓	✓
Issue an Enforcement notice	✓	✓
Issue Fines	✓	
Order payment of compensation to a resident	✓	
Appointment of manager to improve performance of the landlord	✓	
Transfer land to another provider to improve management of land (following an inquiry)	✓ ^b	
Suspension and removal of officers in cases of mismanagement (during or after inquiry)	✓ ^c	
Appoint a new officer to address service failure and improve management of company	✓ ^c	
Appoint an adviser to Improve performance		✓
Requirement to tender some or all of its management functions	✓	✓
Requirement to transfer management of housing to a specified provider	✓	✓

a) This includes registered charities, housing associations and "for-profit" private sector landlords. b) Does not apply to registered charities, c) Applies to not-for-profit providers only

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

'Safe' being added to 'Decent' homes is an expected step. Following the Grenfell tragedy, it is right that the initial focus be on 'at risk' blocks of accommodation, and the government will want assurances that buildings are safe via regulatory oversight.

However, going forward, we should expect to see enhanced oversight and reporting on key areas of safety such as fire, gas, electrical, asbestos, legionella, lifts and so on.



Chapter four:

Tackling stigma and celebrating local communities

On reading the green paper we felt this chapter and the evidence it raises around stigmatisation of social housing tenants was not reflective of our own customers. As part of our response we consulted with our customers to ascertain their views, with the results below.

We talked to **250** people

82% proud to be a social housing tenant

68% feel equal to a person who has bought their own home

62% do not have an aspiration to buy their own home

Similar to the 'see the person' campaign we have developed our own internal campaign to highlight customers' differing backgrounds. Their stories line the walls of our offices to remind our employees, visiting stakeholders and guests why we are all passionate about this sector and the real impact we can have on the lives of our customers.

William and Katrina

William lives with his wife Katrina in a three-bedroom shared ownership property in Rotherham.

They've been increasing their own share in the property recently but are looking to buy a house outright for the first time. William works as an electrician for a construction company after being their apprentice so travels around quite a lot, working on different sites. In his spare time, he enjoys playing lots of different sports.



Wendi

Recent graduate Wendi lives in one of our one-bedroom flats and works part-time but is trying to find a full-time job.

Wendi lives in a one-bedroom flat in Sheffield. She's a recent business graduate from university, where she stayed in one of our student accommodation facilities in Nottingham.

She works part-time in a bar and is trying to get a full-time job but is struggling. Wendi enjoys socialising with friends and playing music.



Throughout our consultation we raised the question 'what is a community?' Many felt that the definition of community has changed overtime and is perhaps very different to what it was on the introduction of social housing. The concept therefore of celebrating local communities becomes a much bigger task, it needs to be inclusive for all, and this is now much wider than just people living on the same street.

How could we support or deliver a best neighbourhood competition?

We consider that it is for providers, who know their local communities best, to deliver these types of initiatives. Positively publicising the best of the sector will help to bring an end to the 'portrayal of the poor' and so-called 'poverty porn' in the media.

We already celebrate our communities – this year we launched a new set of awards open to the whole of the communities in which we work and not just limited to our customers. This is just one way in which we celebrate our communities and each year we task ourselves with growing this and doing more. Previously we have held garden competitions, talent shows, 'Dragons Den' projects and much more. We do not feel this is something that should be prescribed as providers know their local communities best, know what engages and incentivises them and therefore should have the autonomy to deliver neighbourhood competitions in a way that best suits customers.

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

We asked just over 250 customers who live in our homes if they felt proud to be a social housing tenant –

overwhelmingly 82% said they were. What's more, 68% said they felt equal to someone who had bought their own home.

As a sector, if we focus on showcasing social housing tenants, for example because they have found work, we are in danger of creating a stigma ourselves

There is a rich and diverse mix of people living in social housing that should be celebrated for their choice to live in it. This means balancing the messages coming from the sector to include those that need support to 'get on' and those that need stability to 'move up'

Through our involvement with the TPAS consultation, tenants felt they were being stigmatised by government because they should be aspiring to buy their own home. Our own independent consultation supports this with only 38% of tenants having this aspiration. People shouldn't be labelled as being 'social' tenants

Looking at the development of new homes, many housebuilders place social housing in the 'worst' part of the plot. We believe developments should be 'tenure blind', with social housing 'pepperpotted' around the site.

Media can also do much more. So-called 'poverty-porn' is still rife on television. Programmes need to build on the recent #Benefit2Society and 'see the person' campaigns which look at the good aspects of communities. The majority of customers have nice, welcoming homes and are living fulfilling, everyday lives.

However, without prejudice, some customers do need also to step up and recognise some of the behaviours that can lead to this stigma. Providers should be there to support people to 'get on' in life but be able to take prompt enforcement action where they do not abide by their responsibilities.

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

It is about much more than housing management – providers are complex multi-disciplinary business and customers will interact with staff involved in a variety of functions. There is a skills

gap, particularly in our geographical location so professionalisation for us remains about training, development, and effective recruitment driven by the positive promotion of opportunity alongside other more 'established' career paths.

We are already innovatively working with local schools and colleges to do this, but we need to continue and do more. It is still early days, and while we believe this will help us to nurture our own talent, developing these skills takes time and therefore we are yet to see this have a significant impact.

We need to do more to encourage skilled people, who work within the sector for the right reasons, to stay within the sector – and retain talent within the organisation.

Internally we are delivering a Leadership Development Programme to support our managers to manage better and promote professionalism within the sector. We know there are areas we can all improve on. We need to find the right balance to ensure we are giving our people the autonomy to get the job done whilst holding people to account should standards fall.

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

An assessment of whether people would recommend organisations (called a net promoter score) or relevant satisfaction survey results would be a good measure. For example, the percentage of customers who would recommend their neighbourhood as a place to live or would recommend the provider to their friends and family.

However, it should be recognised that these means different things in different areas and while providers will focus on things like graffiti, rubbish/litter, and antisocial behaviour, it is about perception and there are factors that cannot be directly influenced by providers such as schools, transport and the street scene.

We already measure and report on a number of KPIs, including satisfaction levels,

neighbourhoods as places to live, handling of complaints, and engagement with residents. We also measure and report on antisocial behaviour as discussed later in our response.

Where providers own the majority of the 'estate', they should pull their weight and support the community – even where they don't own some of the properties there. We do a lot of this already, but we could do more. For example, engage with young people about being good residents and showing good behaviours.

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?

In 2018, we produced a research report, More Than Bricks which looked into the importance of social housing providers delivering support services for their customers. In short, we found that:

- **Social housing providers are already offering a wide range of support services, including those aimed at benefits and budgeting, health and wellbeing and various types of skills training.**
- **The majority of providers (60%) said there was demand for greater levels of support currently not catered for, particularly around specific vocational training, digital support and mental health.**
- **More than 90% of organisations stated their support services had been impacted by funding cuts over the last three to five years, while the majority cited mostly negative expectations towards the future funding of support over the next three to five years.**

As a charity, delivering on our charitable objectives, we report on our wider activity and associated social value impact already (last year, our social value impact was calculated at £2.4m). We would welcome others to follow suit, however we recognise that not all social landlords hold charitable status. Some social housing providers are not currently delivering wrap-around services

like us. They may be acting more like private developers than social housing providers.

There would need to be a consistency around how these aspects are reported and measured. For example, we use the Housing Association Charitable Trust's social value calculator but there are many other calculators available to use, which would provide different outputs.

At the moment, this area of work is not regulated or officially reported on. It is seen as going the extra mile. However if it was, does it become the norm and what then does going 'above and beyond' look like?

How are landlords working with partners to tackle antisocial behaviour? What KPI would be used to measure this work?

We have a good relationship with local authorities, particularly within Lincolnshire, and we are working towards building better relationships within South Yorkshire. We attend police, Multi-Agency Risk Assessment Conference (MARAC) and Antisocial Behaviour Risk Assessment Conference (ASBRAC) meetings.

Antisocial behaviour is often not a 'numbers' issue and no matter how well case management is handled, satisfaction will most likely be guided by the outcome achieved and a complainant's expectations. There are occasions where desired outcomes cannot be met or an outcome be delivered as quickly as a complainant would prefer. They give an indication of matters arising and success in resolving issues, but we need a wider test.

The best KPI at the moment would be the percentage of customers who would recommend their neighbourhood as a place to live.



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

The government, in its many guises, have in the past provided valuable standards for fundable developments such as Lifetime Homes and the Code for Sustainable Homes. However, the housing crisis has forced the government to reduce this expectation and potentially reduce standards across many new homes being developed

Good design through specified standards would lead to a better product, but funding is needed. Some local authorities have design standards (for example, Manchester), consulted on with residents. This is a good example of an easy way to engage with communities to get better out of planning.

Placemaking is also important. Aesthetic architecture, layout of schemes, provision and proximity of amenities, traffic control measures and play facilities should be incorporated into planning guidance

Social housing also tends to get a lot less provision for car parking. This can result in estates looking untidy and leading to further stigmatisation. The whole process needs to be less onerous, which potentially has an impact on good design. It needs to be more focused on the end result.

How can we encourage social housing residents to be involved in the planning and design of new development?

Customers – existing and potential – should be engaged about planning matters right at the start of the planning process. This process is already open to scrutiny but can be quite formal at times and needs to be more open and accessible.

There are lots more we can do in placemaking – for example, encouraging schoolchildren in the actual design process – particularly in larger regeneration projects.





Chapter five:

Expanding supply and supporting home ownership

We understand the government's requirements to increase the amount of affordable housing available and support their plans to develop a further 300,000 homes by the mid 2020s.

We have ambitious growth aspirations too, together with a healthy pipeline of new build activity. But supporting the government on their development plans doesn't just mean increasing the number of homes we are able to offer people.

Funding is, as always, key but we believe social housing providers should be at the forefront of the crusade to help people in need. As reiterated in the green paper itself, we agree that social housing is the first social service.

There is little point in providing a home for someone if the other services they require are not up to scratch or relevant. Social housing providers like us are in a perfect position with unparalleled access to the people who need support services. By giving us the tools, we can ease many pressures placed on other government-funded services.



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?

The balance between grant funding for housing associations and Housing Revenue Account borrowing for local authorities is not widely known, even within the sector. If the government is committed to investing in both, they should not adversely benefit either pots. A fair and equitable split should be encouraged.

The government needs to ensure there is a level playing field, particularly in areas where a local authority outsources its social housing development delivery to social housing providers. It should also be noted that local authorities will always have competing priorities.

What level of additional affordable housing, over and above existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?

For our size, we already have very ambitious development plans and a strong pipeline of opportunities in place with over a thousand new homes being developed in the next four years.

The number of new homes that could be developed is exponential if long-term funding arrangements are in place and providers have the capacity to deliver.

As funding for new homes is predicated on discounted future net rental receipts, then certainty about rental income is almost as important as capital grant funding. Based upon the current rent formula approach the four-year rent reduction imposed in 2015 resulted in a loss of over £28,000 income, over the duration of the standard planning period, on an average £85/week social rented property. Consequently, imposed rent reductions do not help the sector to re-invest and greater rent freedoms for the sector are important.

Certainty of funding would deliver better and cheaper procurement and value for money and help providers deliver more wrap-around support services to take pressure off other government services, such as health or employment services. While there is uncertainty, housing associations will always need to act prudently to satisfy the Regulator as to the appropriateness of their financial and governance robustness.

Providers should be trusted to move away from a rent formula, which is currently based on data, which is almost 20 years old. It is outdated and needs to be reformed.

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

Anything that helps people move into shared ownership and onto the property ladder, if they want to, is a good move.



However, we asked just over 250 people living in our homes if they have an aspiration to one day buy their own home. Some 62% said no, this was not their aspiration.

For those that do want to buy a share in a shared ownership property, the government and providers should be encouraging people to purchase what the output of calculations say. For example, if calculations show that someone – because of what they earn – can afford 37%, then their first stake should be 37% and so on.

The government could give consideration to lowering the threshold for first tranche acquisition in shared ownership properties from 25% to 10% or even less. It could introduce deferred purchase arrangements whereby deliberate rental overpayment are set aside by Providers to facilitate a mechanism for saving to trigger tranche purchases.

Flexibility of staircasing welcomed, but it could raise more questions than it answers. For example, if customers are allowed to staircase in 1% increments, do they need to pay solicitors' fees each time? And, if lower initial first tranche thresholds were introduced, at which point during staircasing do repairs become the tenants' responsibility?

It is also worth noting that some rural homes available for shared ownership might have a local restriction as to who can obtain the property. Customers may also then not be able to fully staircase up to 100% because of rural designations. We understand the desire to retain affordable housing within a rural setting, however, these restrictions mean these homes are harder to 'sell' in the first place and then 'sell on' when the top agreement of 75% is reached. We would welcome the removal of the rural designation to support customers to move on.

In addition, lenders in this sector are limited and often limit how much they will lend in one geographical area, so more lenders are needed.



Conclusion and recommendations

While we hope our response will go some way into informing government about the changes we – led by our customers – want to see, it has also helped to sharpen our thinking and identify areas for our own improvement. We're confident we will not be alone in taking a refreshed look at ourselves and hope to engage with other providers to identify commonalities and, as a sector, collaborate to make a greater impact.

We have outlined a number of recommendations to take forward:

Acis should:

- Review our approach and current support provided for customers who wish to make a complaint.
- Review our approach and methodology to the way in which we capture our social value data.
- Identify what would be representative of our customer base – we know our current panels are not representative but there is a need to clarify what this would look like and review recruitment methods.
- Increase our customer satisfaction by providing more services or adapt our current delivery in line with customer needs and wants.
- Review key standards relating to safety, void properties, customer services and our current service offer. Develop clear minimum standards together with guidance for implementation.
- Continue to grow our customer initiatives which help tackle stigma.

The wider social housing sector should:

- Standardise our approach to complaints and the support we provide customers wanting to make a complaint. Whilst we may all operate varying complaints processes, customers should be able to expect clarity and standard level of support throughout this process.
- Standardise our approach and reporting of social value.
- Ask our customers about what is really important to them, what are their expectations of a great service and how can we work collectively as a sector to deliver it.
- Positively promote the sector and the wider work we do to tackle stigma.

The government should:

- Develop clear and measurable KPIs, taking into account the additional services some providers offer.
- Develop in consultation with customers and providers, a new Decent Homes Standard and look to implement across the board.
- Recognise that an increase in standard will require additional funding and make this available within the sector.
- Continue to fund the development of new homes and provide social housing grant to enable providers to deliver on what is needed.





For more information

To find out more about any of our thinking in this document or to discover more about what we do to support communities, visit www.acisgroup.co.uk or call us on **0800 027 2057**.