

G15 Response to the Social Housing Green Paper: 'A new deal for social housing'



About the G15

The G15 is the group of London's largest housing associations.

We're the collective voice of some of the leading organisations in the housing sector.

Our members house one in ten Londoners and are the largest providers of affordable homes in the capital. We build a quarter of all London's new homes and manage almost 600,000 homes.

Housing associations were set up to support people in housing need and this remains at the heart of everything we do today.

We're independent, charitable organisations and all the money we make is reinvested in building more affordable homes and delivering services for our residents.

Each G15 member is different, but we're all striving towards the same goal – to solve the capital's housing crisis and improve the lives of Londoners.

Our members are: A2Dominion, Catalyst, Clarion, Hyde, L&Q, Metropolitan Thames Valley, Network, Notting Hill Genesis, One Housing, Optivo, Peabody and Southern Housing Group.

How we've developed our response

The content of this response was developed following:

- G15 board discussion between G15 chief executives and senior MHCLG officials.
- Two workshops with senior policy staff from G15 member organisations.
- Two resident consultation events organised on behalf of the MHCLG, one in London hosted by One Housing and another in Sussex hosted by Optivo.
- Numerous resident engagement events organised by G15 housing associations with our residents held in London, the South East and the Midlands.

The G15 response provides the shared view of our members on some of the main issues raised by the Green Paper. It draws on the views of G15 staff and residents.

As some of the issues raised involve detail which varies between associations, some G15 members will also be submitting their own responses to supplement this response.

Next steps

We see this response as the beginning, not the conclusion of our conversation with the Ministry of Housing, Communities and Local Government (MHCLG) on the range of important issues contained in the Green Paper.

We want to engage in a continuing dialogue with MHCLG Ministers and officials to further develop our thinking on a number of important areas:

- Our consultation events have been incredibly useful in engaging residents and highlighting their views on many issues. They have equally generated questions we want to explore further with our residents and ideas that we want to look into in more detail. To strengthen trust between our organisations and our residents it is important that this dialogue with our residents can continue to shape the thinking being developed by the Ministry. We would be happy to welcome MHCLG officials to join us for these additional discussions to hear directly from our residents.
- G15 members share a determination that the housing association movement renews the nature of our relationship with our residents, to innovate on resident involvement, to be leaders in openness and transparency and ensure stronger accountability. Work led by the National Housing Federation, with G15 involvement, is ongoing and developing rapidly. We would welcome the opportunity to discuss this work further with MHCLG, the Regulator of Social Housing and our residents, to agree a set of measures that satisfy all of our key stakeholders.
- In consultation with our members and residents, we sought to rise to the challenge set by Government and have developed a number of innovative ideas. These proposals require detailed work with our partners and residents which has not been possible during the consultation period. We are excited about developing new approaches to tackle some of the major issues set out in the Green Paper. We look forward to undertaking further work in collaboration with Ministers, officials, our partners, boards, staff and residents to work up detailed proposals that have widespread buy-in.

Contact details for further discussion

This response has been co-ordinated by Optivo's External Affairs team on behalf of the G15. We can be contacted on externalaffairs@optivo.org.uk

Overview of our response

Overall

The G15 strongly welcomes the Social Housing Green Paper and the opportunity to engage in this consultation.

In launching the Green Paper, the Government has given a much higher profile to social housing issues, which too often receive little public debate. This is very welcome.

We particularly welcome the positive approach to social housing and social tenants taken by the Green Paper. In the past, Government had risked emphasising home ownership at the expense of promoting a sustainable mix of housing, including significant investment in affordable homes. It is very positive to see a recognition from the Prime Minister and the Secretary of State that affordable homes play a crucial role in our society. We welcome the leadership they have shown in arguing that instead of being stigmatised, affordable housing should be celebrated as a central part of inclusive, mixed communities.

The Green Paper has sparked significant debate in G15 member organisations and led to valuable conversations across the country with our residents.

Summary of our response

Safety

We see the safety of our residents as our most important duty as a landlord and are treating improving building safety as a top priority.

- The G15 supports the recommendations of the Hackitt Review and sees its implementation as fundamental to improving resident safety. G15 members are working closely with officials in the Building Safety Programme to help shape its successful delivery. This includes Dame Judith's recommendations to find new ways of involving residents in decision-making on safety, which we strongly support.
- G15 members will continue to work closely with MHCLG and our residents to develop new ways of engaging in resident safety issues.
- We also continue to take legal action against building contractors who have failed G15 members and our residents. It is important that Government exercises strong leadership to tackle the quality problems in the construction industry, which affect both resident satisfaction and safety.

Transparency

The G15 strongly supports moves to increase the transparency of housing association services.

To ensure that this happens effectively, it is crucial that:

- Current work, led by the housing sector, to improve transparency is supported by MHCLG and the Regulator of Social Housing.
- Given the lukewarm support from our residents for the introduction of league tables, further discussions take place to understand how best to make performance data more accessible to residents.
- Perverse incentives for 'hitting the target and missing the point' are avoided. This can be achieved through:
 - A focus on outcome based measures that set a positive framework for innovative, responsive actions, rather than prescriptive targets which can drive top-down, technocratic, procedural responses.
 - Further detailed discussions between G15, the National Housing Federation, MHCLG and the Regulator to examine options for appropriate measures.
 - Officials properly reviewing the significant research evidence of target-setting in the NHS, education and other sectors which have experienced league tables.
- Context is provided so that performance data can be interpreted fairly in what is a complex and diverse sector.

Resident involvement and empowerment

The Green Paper is right to identify improving and expanding resident involvement as a key area. Post-Grenfell, reforming the way we engage with, listen to and involve tenants is vital if we are to strengthen trust in social landlords.

- Drawing on examples of excellent practice from within the G15, we argue that leadership and culture should be recognised as the fundamental drivers of successful resident involvement.
- To drive a step change in leadership and culture, we advocate:
 - significant changes to board responsibilities for involvement and transparency,
 - a new charter setting out commitments which organisations can be held accountable for,
 - a single portal for tenants to scrutinise performance information
 - new provisions in the Governance standard to enable action by the Regulator of Social Housing where organisations fail to step-up.

Tackling stigma

- We support calls to tackle stigma, but believe that this needs to be a shared effort between Government, the media, housing associations and tenants.
- We ask for Government to recognise the complex set of interconnecting factors which perpetuate stigma and to recognise the important role it must play.

- Cross-government leadership will be needed to tackle a number of important causes of stigma, including the stigmatising effects of some aspects of welfare reform and public service reductions.
- Residents regularly cited negative media portrayals of social tenants as a key cause of stigma. More needs to be done to tackle stereotyping of residents in media coverage.

Increasing supply

G15 members are committed to doing all we can to maximise the number of affordable homes being built. Our members build 10,000 homes each year and collectively we're delivering 40% of the Mayor of London's affordable homes pipeline.

- The G15 sees the shift to longer-term, less bureaucratic, more stable funding programmes as central to increasing home building by housing associations. We welcome the steps taken by Government to introduce longer term-funding. The G15 strongly supports the introduction of strategic partnerships by Homes England.
- We would welcome a continued push from Government to make longer term funding the norm for affordable housing.
- We share the Ministry's desire to better understand future housing funding requirements and potential supply. To produce up-to-date evidence, the G15 has established a joint project with the Greater London Authority. We are undertaking an analysis of the costs of London's affordable housing needs for the next Spending Review period. This includes examining the question raised in the Green Paper about the scale of additional supply that longer term funding could unlock. Once this work is concluded we would welcome the opportunity to share this modelling with MHCLG.

Response to Chapter 1 - Ensuring homes are safe and decent

Consultation questions: 'How can residents best be supported in this important role of working with landlords to ensure homes are safe?' 'Do we need additional measures to make sure social homes are safe and decent?'

Implementation of the Hackitt Review recommendations is critical to improving resident safety

In consultation workshops on the Green Paper, residents have:

- asked for more information about the safety measures provided in their building,
- stressed that they see safety as primarily the responsibility of their housing associations
- also asked that clearer information is provided to them as residents to clarify what they can do to contribute to improved safety

The Hackitt Review makes clear recommendations on all three of these issues. The G15 strongly supports the recommendations of the Hackitt Review and we see its implementation as fundamental to improving resident safety.

The Hackitt Review has already set out a clear and wide-ranging set of measures needed to improve the safety of homes and to involve residents in safety decision-making. We believe that continued joint work with housing associations and our residents to implement these recommendations effectively should be the top priority for MHCLG on resident safety.

We agree with Dame Judith's conclusion that 'integrated systematic change', delivered through a new regulatory framework, is needed to improve safety in high rise residential buildings.

Dame Judith argued that safety would be improved by a 'joined up implementation plan to provide a coherent approach to implementing the recommendations'. We agree and see this as critical.

Given the importance of delivering systematic change, it is important that new safety measures being discussed in the context of the Green Paper fit into this new, integrated, coherent framework being developed to implement the Hackitt Review recommendations.

Residents' involvement in safety

The G15 is guided by the recommendations contained in the Hackitt Review which provide a wide-ranging package of reforms designed to secure resident involvement in building safety matters.

These should provide the basis for work by MHCLG on resident involvement in fire safety.

The Hackitt Review has a dedicated chapter on resident voice, which contains recommendations that set out clear requirements for a significant enhancement of resident involvement in safety:

- A statutory duty be created to require the pro-active provision of safety information to residents (Recommendation 4.1)
- Resident engagement strategies be adopted in high rise buildings to ensure meaningful resident involvement (Recommendation 4.3.a)
- Government should provide funding to organisations to provide ‘advice, guidance and support to residents, landlords and building owners on effective resident involvement and engagement in order to develop a national culture of engagement for residents of all tenures’ (Recommendation 4.4)
- There should be an ‘independent body with access to appropriate knowledge, resources and enforcement powers’ that residents can escalate safety concerns to if they remain dissatisfied with the response of their landlord (Recommendation 4.5)

We also agree with the Hackitt Review’s recommendation that resident involvement goes beyond voice, and must include active participation in helping to maintain the safety of their building:

- The duty-holder for the building ‘should provide residents with clear information about their obligations in relation to building and fire safety, and residents should meet their obligations to ensure their own safety and that of their neighbours.’ (Recommendation 4.6)

G15 members have welcomed these recommendations and work has been ongoing since Dame Judith published her report to consider how these can be implemented. This includes discussions with residents about how best to involve them in safety decision-making.

The means by which residents are engaged needs to be flexible and adaptable to suit local circumstances. This draws on the experience of G15 staff involved in resident involvement and feedback from our resident consultation workshops.

Feedback from G15 staff and residents on how best to deliver safety involvement made clear that:

- It is important to set common outcomes or standards, but the particular ways in which involvement is delivered should be agreed with residents on a case by case basis. Examples were given of how, on large estates, the ways in which residents wanted to be involved can vary from block to block. In considering regulation, Government must understand that being genuinely responsive to residents’ involvement preferences may involve a diverse range of delivery mechanisms. A one-size fits all approach is unlikely to be viable.

- Involvement needs and preferred engagement methods can vary significantly between tenures, given the different demographics of shared owners, leaseholders and tenants. This needs to be taken into account.
- Supported housing often requires specialist approaches to involvement, particularly where residents have complex needs.

We would welcome strong ongoing partnership work with the Ministry

G15 members are actively working with MHCLG's Building Safety Programme. Our work on building safety is led by Elaine Bailey, chief executive of Hyde.

We have found officials in the Building Safety Programme to be helpful, open and constructive. We welcome the opportunity to continue this close joint working to make progress on the complex set of safety issues.

Response to Chapter 2 - Effective resolution of complaints

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

In the consultation events held by G15 members, we did not find any resident support for either maintaining a waiting period nor retaining the democratic filter.

There was strong and consistent support for a simpler, more streamlined arrangement for escalating complaints to the Ombudsman once housing association complaints processes had been exhausted. It was felt that this would be beneficial for residents, housing associations and local politicians. It was also repeatedly argued that a simplification would bring the practices of the Housing Ombudsman into line with those of other ombudsmen.

Consultation events revealed genuine confusion among residents and housing association staff regarding the rationale for these requirements. Residents and staff who had cause to refer cases to other ombudsmen highlighted the simpler access available and felt access requirements should be standardised.

A number of housing association staff who participated in the G15 workshop were serving councillors from a range of parties. They expressed concern that the democratic filter was confusing for both councillors and residents.

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

G15 members take complaints raised by residents regarding building safety very seriously.

Work has been undertaken since the Grenfell fire to review how safety related complaints are reported, recorded and monitored.

The G15 supports moves to ensure that residents can seek independent redress where they feel that safety concerns have not been adequately dealt with. We therefore support Recommendation 4.5 of the Hackitt Review, which calls for:

'an independent body with access to appropriate knowledge, resources and enforcement powers' that residents can escalate safety concerns to if they remain dissatisfied with the response of their landlord

There may be an opportunity for the Ombudsman to act as the independent body for the purpose of this recommendation.

Consultation question: Is 'serious detriment' the appropriate threshold for intervention by the Regulator for a breach of consumer standards?

It is important that the system of redress is clear for residents, housing associations and the Regulator.

The G15 sees the serious detriment test as an appropriate threshold which ensures proportionality of intervention. It also helps to provide useful clarity on the distinct roles of the Regulator and the Ombudsman. It ensures that the Regulator focuses on systemic failures and/or those which pose harm to tenants, while the Ombudsman picks up individual complaints and assists with landlord/tenant dispute resolution.

To remove the threshold for regulatory intervention would risk a confused situation where the Regulator and the Ombudsman had duplicate responsibility for helping to resolve individual complaints of all types. This would likely make the system of complaint and redress unclear and confusing for residents and housing associations.

Response to Chapter 3 - Empowering residents and strengthening the Regulator

Leadership and culture as fundamental ingredients of a new approach

Post-Grenfell, ensuring residents are better informed, involved and listened to is a high priority for G15 members.

We want to drive sector-leading standards of resident involvement and empowerment. And we want to contribute to ensuring that the wider housing association sector becomes a beacon of excellence on transparency, involvement and empowerment. We believe that there is an opportunity to secure lasting change.

We have had extensive debates with our tenants about what meaningful involvement looks like and we can make it happen.

Again and again, residents have raised two issues. They want to see stronger *leadership* so that the push for resident involvement comes from the top of organisations. They want to be reassured that senior staff are interested in what they have to say and are listening to their views. They also want to see a stronger *culture* of involvement. That means that engagement isn't tokenistic but is part of what the organisation does. It means all staff genuinely welcome the opportunity to work with residents and residents are consistently treated with respect.

A new approach to resident involvement

We have discussed what needs to change to push stronger leadership on resident involvement and organisational cultures where listening to residents is the accepted norm.

We are advocating wide-ranging changes to develop a new approach to resident involvement. To drive systematic change, this new approach involves a number of major changes.

1. Clearer standards

- Changes to the Regulator of Social Housing's Governance and Viability standard to make resident involvement a clear requirement
- Changes to the Code of Governance for housing associations to include new responsibilities for boards to lead resident involvement from the top.
- A new Involvement and Transparency Charter which will see associations make clear commitments, which they can be held accountable on.

- Clearer local standards developed by individual housing associations in partnership with their residents, to set out their approach on transparency and involvement.
- Resident scrutiny to hold boards accountable for delivering Charter commitments.

2. Greater transparency

- A new set of holistic performance measures covering economic, physical and consumer issues for residents. These should be outcome focused.
- Greater transparency on housing association performance, with this new range of measures available through an accessible, online residents portal
- An annual statement to be published by associations explaining how they have met the requirements of the Code and the Charter and if they haven't, why not.

3. New tools to challenge poor performance

- A new ability for the Regulator of Social Housing to formally examine a housing association's approach to resident involvement and transparency through the inspection regime.
- A new ability for residents to make complaints about resident involvement and transparency to the Regulator and these complaints to be investigated against compliance with the Governance standard.

Taken together, we believe that this package of measures would drive profound change in the leadership and culture of housing associations on transparency and involvement. We believe that these steps would create both requirements and powerful incentives for involvement and transparency to be taken much more seriously.

How this new approach would work

1. Clearer standards

We believe that being transparent, keeping residents informed and providing meaningful opportunities for residents to be involved are fundamental aspects of good governance.

Amending the Regulator of Social Housing's Governance standard to strengthen requirements on resident involvement would have two benefits. Firstly, it will set out

the Regulator's clear expectation that high quality resident engagement is central to running an effective housing association. Secondly, it will mean that the Regulator can assess issues of involvement and transparency as part of the existing inspection regime through In-Depth Assessment.

To supplement this regulatory change, it is important that a clear responsibility is placed on boards to drive a culture of involvement from the very top. To ensure this, we propose that the National Housing Association Code of Governance for housing associations be amended to add clear requirements for boards to take responsibility for the transparency and involvement agenda. We believe that this will incentivise strong leadership by boards and encourage them to both push these priorities and provide greater challenge to executive teams to deliver them.

To ensure that overarching requirements are backed up by action, we propose a new Involvement and Transparency Charter. This builds on the detailed work being undertaken by the National Housing Federation and would be agreed after discussion between associations, our tenants, MHCLG and the Regulator.

To properly implement these measures, housing associations would work with their residents to develop their own local approach for delivery against the standards. This would include work to drive consistency in the quality of day-to-day services.

It is worth noting that these proposals are designed for charitable housing associations, driven by social purpose. There is a growing number of new profit-making organisations delivering affordable housing. Whether these proposals would be sufficient to drive positive behaviours among 'for profit' providers would need to be reviewed.

2. Greater transparency

We believe that housing associations should be more transparent about their performance. This means both that a wider range of data should be made available and that data should be more accessible to residents.

Performance data is current published through annual reports, the Sector Scorecard, Statistical Data Returns and several other means. Too few of the measures published cover the issues that tenants are most worried about, like repairs, complaints or involvement. And residents keen to scrutinise an association would have to review multiple, and often complex, documents.

Drawing on thinking in the Green Paper, we advocate agreement being reached on a single list of holistic measures that associations will publish data on. We also advocate the creation of a single, online, residents' portal where this data is available in an intuitive, easy-to-use way.

Key performance indicators

We agree with the areas suggested in the Green Paper as a basis for key performance indicators. G15 members have developed a list of suggested measures that could be used to monitor progress against these. We would welcome the

opportunity to have a more detailed conversation with our residents and MHCLG to develop these further.

To make a real difference to residents, it is important that the performance indicators adopted are designed to incentivise positive behaviours and not technocratic compliance. To help ensure this, we would suggest that performance indicators should follow a number of principles:

- *Outcome based* – seeking to incentivise stronger leadership, culture and delivery. Avoiding process-driven targets which can incentivise simplistic, technical compliance.
- *Respect diversity* - applicable to the diverse range of housing associations and allowing meaningful comparisons
- *Set in context* - reported with appropriate context about the size, location, role and resident base of associations
- *Provide the flexibility to be responsive and innovative* – sector-wide performance indicators should not interfere with the need for associations to agree their own accountability arrangements with residents, nor stifle innovative practice by driving bureaucratic approaches.

In addition to these changes in how data is provided for resident scrutiny, we recommend that the Involvement and Transparency Charter commits associations to publishing an annual statement of compliance with the Charter requirements.

3. New tools to challenge poor performance

It is important that this new approach has teeth, so that residents have the confidence that poor performance can be challenged.

The model outlined would create more robust opportunities for external assurance and ensure that the Regulator of Social Housing could take into account resident involvement.

Board ownership of resident involvement and transparency will mean that boards will need to seek assurance on compliance with the new charter. In the same way that boards receive assurance on other key areas for which they hold responsibility, resident involvement would be subject to the same process of reporting, backed up by internal and external audit.

Giving boards responsibility for overseeing resident involvement and a new requirement in the Governance and Viability Standard means that the Regulator can consider adherence to the code as part of the governance element of In-Depth Assessments. Boards that cannot demonstrate satisfactory leadership on resident involvement could be found to be in regulatory breach by the Regulator.

Equally, residents who believe that their landlord is not fulfilling its obligations can make a formal complaint to the Regulator, who would now have resident involvement and transparency formally within its remit.

Strengthening the Regulator

If resident involvement, accountability and transparency are to become a clearer part of good governance, the Regulator will need additional resources to take on this more holistic role.

This will involve appropriate financial resource and staff with specialist skills who can meaningfully assess this aspect of the governance and management of a housing association.

It is vital that any change in the Regulator's responsibilities or approach is supported by Government with commensurate resource. This will ensure that trust and confidence in the Regulator is maintained.

Consultation question: Is there a need for a stronger representation of tenants at a national level? If so, how can this best be achieved?

In consultation meetings, G15 tenants generally welcomed the idea of a national tenant body.

There was debate in some consultation workshops about what the role of a national tenant body should be. Some tenants were worried about being 'represented' by a national group of tenants who they may have little in common with and who may seem quite remote. It was suggested that any new body shouldn't claim to 'represent' tenants, but could help to strengthen the tenant perspective in housing policy debate.

Residents also raised concerns that Government may listen to the views of a small number of tenants sitting on the board of the new national body to the exclusion of hearing the voices of active residents from housing associations across the country. It will be important to ensure that any new body is just one part of the input to Government, but that engagement with active tenants involved in housing associations continues and is enhanced.

We have received very positive resident feedback about consultation events held for the Green Paper and previously Alok Sharma's national roadshow. Residents have told us that they have really valued the opportunity to talk directly to MHCLG ministers and officials and would like this to continue.

Given this tenant feedback, the G15 believes that there would be value in a national tenant body which focused on:

- Providing a tenant perspective on key housing issues
- Raising systemic issues that are of concern to residents

- Helping to champion the importance of resident involvement
- Provide advice and resources to support resident involvement

However, it is clear from resident feedback that any new body should not be seen to act as a 'filter' between the views of tenants and Ministers. The very welcome direct dialogue between MHCLG and residents should remain a core means of listening to residents' views.

The role of a new body should be clearly defined to avoid duplication with the Ombudsman and existing resident involvement structures in housing associations. For example, to avoid confusion and risk undermining the Ombudsman, the new body should focus on systemic issues rather than individual complaints.

Consultation questions: Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords? Do you think that there are benefits to models that support residents to take on some of their own services? How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

G15 members are committed to resident involvement and a number of our members already involve residents in exercising choice over services.

Two examples of current practice include:

- Optivo's Procurement Panel involves both and residents in both selecting contractors and monitoring their performance. This partnership approach works well, with residents bringing a consumer perspective and staff contributing procurement skills. Optivo sees this approach an enabling both resident involvement and a more rounded assessment of bids from contractors.
- Notting Hill Genesis is piloting the use of Plentific.com with its housing officers. Rather than go through a contractor framework, Notting Hill Genesis has enabled frontline staff to book repairs from local small businesses on behalf of residents. The association is exploring whether the pilot could be expanded to enable residents to book repairs directly through the site. Within an agreed price limit and certain requirements, this could give residents the flexibility to choose the tradesperson they prefer.

We believe that there is opportunity to expand this type of partnership approach to procurement and monitoring.

As landlords have important duties for ensuring safety, value for money and other legal responsibilities, we see these partnership approaches a more effective means of resident involvement than transferring decision-making wholly to residents.

Response to Chapter 4 - Tackling stigma and celebrating thriving communities

Consultation question: How could we support or deliver a best neighbourhood competition?

In consultation events, we encountered little resident support for a ‘best neighbourhood competition.’

Many residents felt that the causes of stigma were more profound and would not be tackled by an initiative of this type.

Many housing associations already run neighbourhood activities along these lines.

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

Consultation events held by G15 members revealed very mixed experiences of stigma in the day-to-day life of residents.

Many residents reported that they had not directly experienced stigma as a result of being an affordable housing residents.

In contrast, residents consistently raised serious concerns that affordable housing residents, and specifically social tenants, were regularly subject to stigmatising messages in wider society.

The most common causes of wider social stigma identified by residents were:

- *The negative portrayal of social tenants in the media.*

The Channel 4 programme ‘Benefits Street’ was cited repeatedly as an example of something that was seen to have a long-term negative impact on how tenants are perceived. There was widespread concern that the portrayal of social tenants by the media – in newspapers, TV and film – is usually very negative. Tenants expressed frustration that this resulted in inaccurate assumptions about tenants and encouraged prejudiced views about those living in affordable housing.

- *The previously very negative welfare reform rhetoric of the government.*

Many tenants expressed concerns that being a social tenant was often equated by politicians with being in receipt of multiple benefits and that this was presented in a very negative light.

There was concern that this ignored the significant proportion of tenants who are in work. It was also seen to suggest that tenants who did need to supplement their income with benefits, because of low pay, disability or unemployment, were being labelled as illegitimate claimants.

There was a strong desire for a more accurate characterisation of tenants by Government ministers and a greater level of understanding of why some tenants legitimately require welfare support.

- *The Right to Buy policy*

Some tenants said the Right to Buy policy made them feel like ‘second-class citizens’ because it led to assumptions that those still renting were doing so because they were not wealthy enough or sufficiently aspirational enough to become a home-owner. Tenants expressed frustration at these assumptions, stating that in some cases low pay meant that they could not afford to buy. Other tenants expressed their views that they were proud to be a social tenant, felt that they received a good service from their housing association and therefore did not wish to become a home owner.

Concerns were also raised that in reducing the stock of social homes, without adequate replacements being built, Right to Buy had marginalised the role of social housing by making it accessible only to those in greatest need. This was cited by tenants as encouraging negative and stigmatising assumptions about those living in social housing.

- *The impact of public service cuts on vulnerable tenants*

While the population of affordable housing is very mixed, it does include some of the most vulnerable residents in our society with some of the most complex needs.

Concerns were repeatedly raised that the support provided to vulnerable social housing tenants has been eroded as a result of reductions to local services.

Two services were mentioned repeatedly by residents. Anti-social behaviour is often a concern for residents, particularly on urban estates. Residents and frontline housing officers raised concerns that the reduction in community policing teams and cuts to diversionary youth activities previously run by local authorities were worsening anti-social behaviour and crime. In turn residents were concerned that this was negatively impacting on the reputation of some estates and thereby increasing stigma.

The second area of concern was the increasing difficulty of accessing mental health care and support. Reductions in both local authority social service provision and NHS mental health support were both cited as causing real difficulties for vulnerable tenants.

- *The impact of building design*

Concerns were raised that the design of some affordable homes, particularly larger blocks, can contribute to a sense of stigma. Tenants spoke most often about the poor design of some 1960s/1970s blocks, which were seen to carry negative connotations in society.

Tenants expressed clear views about the need for affordable and private homes to benefit from the same quality of design and construction.

Building on this resident feedback, we ask the MHCLG to:

- Exercise strong leadership across Whitehall to highlight how other Government departments could do more to help tackle stigma. This would include working with the Home Office to explore how the policing of estates with high crime levels can be improved and working with the Department of Health to review the provision of mental health services to vulnerable residents.
- Work with G15 members and the wider housing sector to improve the recognition in the planning system of the benefits of high quality design. We recognise as housing associations that the design of some affordable homes can be a cause of stigma. We want to work with Government and our residents to continually improve design and ensure excellence.
- Challenge the media to be fairer in its portrayal of social tenants. Support the G15 and the National Housing Federation in our communications work to challenge negative stereotypes of tenants.

Consultation question: 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?

G15 members' work to invest beyond housing

G15 housing associations have a strong track record of investing significant financial and staff resource in ways that goes well beyond our landlord responsibilities.

As charitable housing associations, we're passionate about building communities, not just homes. To build strong communities, our members invest in a number of areas, including employment and skills, health projects, educational initiatives, crime reduction programmes and financial inclusion.

Some examples of our members work includes:

- Clarion Futures is investing £150 million over 10 years to provide support, skills and opportunities to more than 360,000 social housing residents.

- Love London Working is a consortium of thirteen housing associations including eight G15 members. It's a training and employment programme to help people into work, including those facing issues due to health, disability or the challenge of being a single parent.
- Optivo's Fresh Visions operates in some of the poorest neighbourhoods in the country and supports children, young people and adults who face extreme disadvantage because of poverty, domestic abuse, lack of education and social exclusion.
- L&Q established the L&Q Foundation in 2011 to help residents and the communities they live in, inspired by the housing association's vision that 'no-one should be denied the opportunity to achieve their full potential because of where they live.'
 - The Foundation assesses the social value it delivers on a regular basis. The most recent annual report [L&Q Foundation 2018](#) demonstrated:
 - The Foundation's activities have generated £23.5million of social value^[2]
 - Nearly 450 residents in crisis were helped to keep their tenancies on track
 - L&Q's financial advice and debt support service helped 2,700 residents get £8million of extra income
 - Over 6,500 young people took part in a range of activities including sport, arts and culture
- Many of our members support people in acute housing need. For example, One Housing runs Arlington in Camden, the largest mixed-use homeless hostel in the UK. Since 2010 it's helped over 550 people gain access to training and qualifications that have led to employment opportunities.
- Notting Hill Genesis offers work placement opportunities and support in the construction industry through the Construction Training Initiative (CTI). Since 1995, Notting Hill Genesis has worked with around 25 other housing associations to pool resources and offer unemployed people the chance to become skilled tradespeople in the construction industry, through the CTI.
- We also work in communities to help build social cohesion – the Metropolitan Migration Foundation supports migrants, including refugees and asylum seekers, with the help they need to integrate into their local community.

Improving the way we measure our wider social impact

G15 members operate a range of ways of measuring social value. Of particular note is the recent work undertaken by Hyde to measure social impact.

Hyde commissioned the impact advisory team at Bates Wells Braithwaite to examine how the social impact of a housing association could be robustly quantified.

Through interviews with staff and tenants, data collection and benchmarking against national data sets, Hyde have been able to assess the value of a social tenancy for a resident. This has included an analysis of the different ways in which a social tenancy has brought value to Hyde's residents, examining the full range of social policy outcomes.

The analysis demonstrates that the total annual social value of a Hyde tenancy is £16,906. This represents a total annual social value of Hyde's social housing of £607m.

This is made up of:

- £172m - Total economic impact of Hyde residents in work
- £93m - Health-related savings generated by Hyde tenancies
- £52m - Local authority savings by moving people out of temporary accommodation
- £55m - Savings in reduced police call-outs and the cost of crime

The analysis conducted by Bates Wells Braithwaite for Hyde was independently verified by PwC through a limited assurance exercise.

An executive summary and full report are available from: <https://www.hyde-housing.co.uk/value-to-society/>

Government's role in social impact

G15 members are keen to do more to communicate our social impact. We are investigating both how value can be more widely captured using models like that developed by Hyde and our working on a number of films to communicate the value of social housing.

As there is significant work going on in the housing association sector already, we do not believe that there is any need for Government to make social impact reporting a requirement, nor prescribe its format. A top-down, prescriptive approach to would risk undermining the current investment by G15 members in developing new, innovative social impact models.

Response to Chapter 5 - Expanding supply and supporting home ownership

Consultation question: 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?

The G15 strongly supports moves to provide longer term funding for affordable housing.

The Chair of the G15 publicly welcomed the Prime Minister's announcement, made at the National Housing Federation conference in September, that a level of funding for housing associations was being guaranteed for ten years, up to 2028/29.

The G15 and the National Housing Federation have long argued for a longer-term settlement for affordable housing and we welcome the Prime Minister establishing the principle of decade long funding for the first time.

The G15 is currently undertaking a joint project with the Greater London Authority to assess the fiscal requirements for affordable homes in London for the next Spending Review period. This includes collating evidence and undertaking new modelling to assess the extent to which longer-term funding would unlock additional housing numbers.

As this work is on-going, we are unable to offer firm conclusions at this time. When this work is completed, we will be very happy to share our work with the Ministry. The project is due for completion in December 2018/January 2019.

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

The G15 believes that there are two main ways in which Government can support shared owners to build up more equity:

1. Support and encourage innovative schemes to reduce barriers to staircasing

G15 member Metropolitan Thames Valley have developed a variation of shared ownership which enables residents to increase equity gradually over time in a way that minimises bureaucracy and cost.

The scheme, 'Shared Ownership Plus,' has enabled more than 70 Metropolitan Thames Valley shared owners to own a larger share of their home using a streamlined process.

Introduced in 2014 for customers of Metropolitan Thames Valley's shared ownership brand So Resi, the scheme enables homeowners to buy an additional 1% share of their home every year for 15 years. Unaffected by fluctuations in the property market, the fixed cost of each share is based on the home's original purchase price and rises by 3% a year.

It makes budgeting simpler, removes the need for solicitors, valuations and stamp duty and brings down rental charges. Participation in the scheme is optional and those taking part can also choose to purchase more equity via traditional 'staircasing.' Participating shared owners can also opt out of Share Ownership PLUS altogether at any time.

In the past four years, 97 of these 1% shares have been purchased by 73 buyers – that's 16.7% of So Resi Plus customers. Many find the 'staircasing' model's minimum 10% stake unaffordable and the associated legal and valuation fees off-putting.

After the initial investment in an IT solution, Share Ownership Plus has proved inexpensive and straightforward to administer for Metropolitan Thames Valley. Other G15 members are actively seeking to adopt the model. The G15 believe that there is potential for this successful approach to be rolled out nationally by housing associations to make increasing equity quicker, cheaper and more attractive to shared owners.

2. Challenge mortgage providers to better support shared owners

G15 members long-standing experience of building and managing shared ownership homes. We have been successful in supporting thousands of Londoners onto the housing ladder through shared ownership who otherwise would likely have been trapped in insecure private rented accommodation.

The work of G15 members in promoting shared ownership as a route to home ownership is hampered by the approach taken by mortgage lenders. Our residents encounter two challenges caused by lenders:

- Despite shared ownership being a proven, mature, successful product, only a minority of major mortgage lenders will provide a mortgage for shared ownership properties. This restricts the choice of lender available to potential shared owners.
- Many lenders that do offer mortgages to shared owners offer less favourable interest rates than on comparable mortgages offered for open market properties.

We ask Government to challenge mortgage lenders to better support shared ownership and treat shared owners more equitably. Reform of lending practices to make shared ownership mortgages more accessible and cheaper would encourage greater take-up and may encourage more rapid staircasing.