

The Regulator of Social Housing's consultation on the consumer standards

Introduction

Southern Housing is one of the largest housing providers in the UK with over 77,000 homes across London, the South East, the Isle of Wight and the Midlands. We're delighted to be offered the opportunity to respond to this [consultation](#). Overall, we believe the standards will help the Regulator in its aims of setting the right expectations for landlords and giving helpful examples in the Code of Practice. We also agree with the principle that the standards are outcome focused and not prescriptive. We consulted a panel of residents to shape our response, views from which we've incorporated into our response and in [Appendix 1](#). The consensus from residents was that the proposed Consumer Standards were largely appropriate, and they welcomed the prospect of more proactive regulation. However, there were areas of push back, most notably in relation to the requirement to collect data on protected characteristics, and in relation to housing associations' management of shared spaces, which we've described under the respective questions below.

Safety and Quality Standard

1. Overall, do you agree that the proposed Safety and Quality Standard sets the right expectations of landlords, as set out in Chapter 6 of the consultation document?

Agree.

Southern Housing supports the inclusion of a standard that would mean landlords have to provide their tenants with "safe, good quality homes" and "effective" services. Broadly, the proposed standard gets this right. The following comments relate to areas we feel require further clarification or attention in the final version of the Consumer Standards.

1. Stock quality

Like most social landlords, Southern Housing has historically relied on data cloning to some degree to build up an accurate picture of the quality of the homes it manages. Moving away from this is the right thing to do. However, it will inevitably take time, especially given the spike in demand for building assessors should the proposed standard be adopted as planned. There will likely be a shortfall of appropriately trained operatives to undertake this work which will add additional barriers.

There has also been an influx of regulation over the past five or so years, which means that there are competing timelines for providers of social housing to work to, to ensure

compliance. Workplans, including workforce planning and development, and resource allocation all require reworking to ensure compliance with the following regulations and of course interactions with relevant bodies:

- New Consumer Standards stemming from the *Social Housing (Regulation) Act 2023*
- *Building Safety Act 2022*
- *Fire Safety (England) Regulations 2022*
- Cooperate with timelines and processes of the Housing Ombudsman
- Cooperate with requirements emerging from the new Building Safety Regulator (BSR) within the Health and Safety Executive (HSE)

We would hope the Regulator recognises the resourcing impact this increasingly complex regulatory environment has on Registered Providers (RPs) on meeting new requirements. We are keen to embed these new processes in a long-term and sustainable way, and to ensure we can deliver the service meaningfully with relevant partners and contractors. We understand that the sign-off of the final standards will be completed by the regulator in February 2024 and shared with registered providers at this time, with the new regulation coming in April 2024. For those who will have an IDA from April 2024 onwards, this will mean a very short window of time to implement these changes.

Accordingly, the Regulator needs to adopt some flexibility in determining what might constitute evidence of compliance in the early phases of implementation. For instance, evidence of plans to introduce a five-year rolling stock inspection programme based on in-depth individual property level assessments should be regarded as compliant for social landlords subject to IDAs while the new, more proactive regulatory regime is in its infancy.

Right to inspect

We have concerns over the feasibility of inspecting all homes for a number of reasons, including access to the homes themselves. Coordinating surveys of individual dwellings will require considerable planning to ensure adequate cooperation and oversight of third-party managed blocks.

We would like clarity on the Regulator's view of how we could demonstrate compliance with this requirement where residents do not allow access to their homes. There needs to be a recognition that in some circumstances, residents providing access for the completion of actions identified from assessment activity is required but that this is not always easily forthcoming. Unlike LAs who can rely on Environmental Health powers to gain access to properties, private RPs do not have this option. For instance, we have to rely on court action for Landlord Gas Safety Record (LGSR) and Electrical Installation Condition Reports (EICR). It's unclear in the current drafting how far an RP will be expected to take action in order to comply with this standard - will an injunction

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be required to ensure we gain access rights? Not only would this be a slow process, but it would also mean RPs incurring considerable cost that could be put to (arguably better) use elsewhere.

Further clarification is also required of the expectations the Regulator has on RPs holding data on conditions for areas in buildings they have no legal right to inspect. Specifically, shared ownership and leaseholder homes. The property inspection requirements appear to be inconsistent with the nature of the legal relationship between, for example, registered providers and shared owners. We encourage the Regulator to be much more precise about how different components of the framework are meant to apply to different groups, citing the legal relationships that exist between landlords and residents as well as the varying housing products. In these instances there is also a question over the scope to make improvements (in the absence of additional investment and cooperation from residents), where stock inspections are carried out and hazards are discovered.

Resident views on stock quality

There was unanimous support among residents we consulted for the new Consumer Standards to include a requirement for RPs to inspect the inside and outside of all homes for which they're responsible. Our residents were keen for us to maximise value for money when we do this. Of note, our residents told us:

"I would back it [the standard] totally. I think it's essential and is what I would expect."

"They [registered providers] should have a full inventory of every property that they own. If I was a landlord and I had properties, I would want to check the situation of each property, because not every tenant looks after their own place the same as other people do."

"If you're a small landlord and you go out and buy one property you want to know everything about that property because you're quite proud of that. And then you might expand and get a second property, and a third, and a fourth, and a fifth. And off you go. But you should still really care about all of your properties. Every single property should be a kind of pride and joy."

3. Health and safety

We agree that when acting as landlords, registered providers must take all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas as set out in point 1.3.1. We also agree that providers should identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas as set out in in points 2.2.1:2.2.3.

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The current Home Standard focuses on “meet[ing] all applicable statutory requirements that provide for the health and safety of the occupants in their homes”. Residents and other stakeholders may interpret the newly proposed Standard's emphasis on “taking all reasonable steps to ensure the health and safety of tenants in their homes and associated communal areas” as significantly expanding Registered Providers' responsibilities. This may require further clarification from the Regulator if this is not the intention.

We believe point 2.2.3, ensuring the safety of tenants is considered in the design and delivery of landlord services, is ambiguous and a much clearer explanation is required. These two expectations could be separated out into separate points and have a fuller expectation.

Two parties involved in risk creation

There are two parties involved in risk creation and its mitigation, including residents. What constitutes ‘reasonable steps’ (1.3.1; 2.2.3), especially in scenarios when residents are resistant to risk reduction strategies or measures, may need further consideration within the new standards. We'd suggest that the Code of Practice references landlords' duty to remind residents of their own role in ensuring health & safety. As well as the residents' duty to comply with their tenancy in terms of keeping their home safe e.g. no barbecues on balconies, there should also be emphasis on providing access to enable us to carry out our duties.

Complications arising from differing tenure type

While we understand and agree with the overall approach of an outcome-led and less instructive piece of regulation, we do believe that the standards as they are currently drafted are not detailed enough regarding leaseholders and shared owners in the context of building safety.

We understand that the Regulator of Social Housing has no legislative direction over these tenures, but in the ‘real-world’ setting of multi-tenure stock, this distinction becomes less relevant. A building – including multiple dwellings of multiple tenures – often requires action and communications relating to safety and fire mitigation that are tenure-agnostic.

Southern Housing will always strive to take the approach of being proportionate and reasonable in communicating to all residents, regardless of tenure, but the Consumer Standards need to be clearer about how far we take our interactions with leaseholders and shared owners about the level of risk that their dwelling is either exposed to, or steps they need to take to enable us to comply with regulations. We would also welcome a review of the Model Lease to reflect the requirements of the new Consumer Standards.

4. Repairs, maintenance and planned improvements

We understand and agree with the principles of value for money, and taking actions that are informed by the needs of tenants as set out across points in section 2.3. However, in instances where there is a risk of death or serious injury to people, loss or severe damage to stock, or environmental harm, registered providers may have to take urgent steps which prioritise safety over value for money, the needs of tenants, or communication preferences. Residents need to be consulted throughout in a proportionate and reasonable manner, but ultimately safety is a priority. Point 2.3.5 concerns the needs of tenants and value for money. It states these will be in addition to the safety requirements at 2.1.2. We think it could be made clearer that safety requirements supersede that of the principles of value for money and needs of tenants.

On repairs, maintenance and planned improvements, our residents told us that RPs need to retain some flexibility so residents can schedule their own appointments. The focus shouldn't necessarily be on outright speed if that is to cause inconvenience to the resident. We agree with this as an approach; it is important that residents choose what suits them and are not dictated by external timelines. We are keen that the regulator doesn't measure success by timescales that we can't meet because we've prioritised flexibility. Our residents told us:

"I think flexibility and I think perhaps [residents] being a bit more involved with the repair [is important]."

"I think you expect tenants sometimes just to be a bit ad hoc with [appointments] - we do have a life and we do go to work."

5. Adaptations

While we welcome the addition of point 2.4.1 on assisting tenants seeking housing adaptations services, we would be keen to see further clarity in terms of how far a registered provider is expected to go in terms of assistance. We also believe that more deliberate wording is needed to ensure that, if intended to only cover social tenants and not leaseholders or shared owners, the wording reflects this.

We would also note that adaptations need to make best use of assets, to ensure that homes meet need. For instance, adapting homes that meet the need of residents or, where there is only one bedroom above housing need to allow for a carer to stay if needed.

On adaptations, our residents were supportive of the inclusion of point 2.4.1. They told us that there could be more thought could be given to those who may have accessibility requirements without certification:

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"I think it's too quick to go straight to the point of medical requirements. I think that there needs to be an in-between stage [when] some people need accessibility or adaptation help, but [they're] not at a stage where you could get a medical certificate."

Terminology

Across the specific expectations but most pertinent in Safety and Quality, we believe the draft in its current form could be clearer in its use of language relating to 'building', 'homes', 'dwellings', 'stock', 'communal areas', and related terms. These must be clearly differentiated, and as a piece of umbrella legislation, the language used should also be entirely aligned to other pieces of regulation that apply to registered providers e.g. the Building Safety Act 2022.

Throughout the draft Consumer Standards, the term 'home[s]' is used, and we assume this to mean individual dwellings as the term 'communal space' is used distinctly. However, when referring to planned improvement to 'homes', it is unclear whether this refers to both individual dwellings and communal areas that would overall comprise a 'building' as used in standards created by other bodies.

The terms 'tenants' and 'shared spaces' have definitions provided in the footnotes of the proposed Consumer Standards, and we believe that this approach is required for the terms 'stock' and 'homes', which the Code of Practice appears to use interchangeably.

Transparency, Influence and Accountability Standard

2. Overall, do you agree that the proposed Transparency, Influence and Accountability Standard sets the right expectations of landlords, as set out in Chapter 7 of the consultation document?

Agree.

Overall, Southern Housing does agree that the proposed Transparency, Influence and Accountability Standard sets the right expectations of landlords, as set out in Chapter 7 of the consultation document. We welcome the move away from 'engagement' and towards 'influence'. However, we – and the residents we spoke to – have concerns around collecting personal data.

1. Fairness and Respect

"1.1.1 Registered providers must treat all tenants with fairness and respect" sets a good tone for the document but it is overly broad and subjective, and there are no specific expectations attached. The accompanying point in the Code of Practice does not provide any additional clarity. Given that treating tenants with fairness and respect

is a universal expectation, additions to the Code of Practice would be useful for any size or type of RP. It is notable this is one of only two themes in the proposed Consumer Standards without a specific expectation. Therefore, the Regulator will need to allow RPs to demonstrate compliance via a broad range of evidence.

Given the breadth and diversity of the sector, we think it is entirely reasonable that the draft tenant involvement standards feel similar to previous iterations. Southern Housing believes that registered providers should be creative and come up with the detail on how best to engage with and deliver for our residents.

2. Diverse needs

We agree with the intent of this standard and its objectives. However, our concern, as with the stock condition data commented on above, is that of resourcing and implementing processes to meet this requirement. It's a large piece of work and we believe that most registered providers will have data missing currently. It will take time to acquire more, and of course, there will be many instances where residents refuse to provide data, as is their right. Despite best efforts we don't believe it will be practically possible to achieve.

RPs must allow residents quiet enjoyment of their homes, which this standard may contradict if we are to undertake mass data collection, which could become highly intrusive. It would be difficult to gather the information that is useful without it being intrusive – e.g. asking them specifically what health conditions they have. This could also become very costly, and residents may query funds being used in such a way.

Some personal data can be of a transient nature – e.g. a broken leg and associated vulnerability and/or accessibility issues – and collecting and recording this would mean a need to assign a short retention period and then deletion after that period. This is not practical and increases the risk of breaching data protection requirements.

We would hope that the Regulator, in taking a proportionate approach, would expect RPs to demonstrate they are taking account of diverse needs by:

- actively encouraging residents to let RPs know their specific needs if they feel able to, and making it easy for them to do so
- at a systemic level testing services against the specific needs of potential specific challenges residents may have.

Our residents told us they were cautious about the Regulator asking RPs to collect personal data on tenants. They felt strongly that RPs need to be crystal clear why we're collecting the information and how we're using it. They suggested that we should offer a range of different ways for residents to provide the information to us.

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Specifically, they said:

"I think that's [collecting personal data] going to be a very difficult task because many people will be very offended if you start asking personal questions. We rent our homes from you and [if you] ask us anything about the home, we're quite happy to answer. But when you start getting into [questions] more of a personal character, I think that's when you're going to find it a lot harder."

"From the staff point of view [those] that are coming out [and asking for information], some people [tenants] are going to get quite abusive about that - how do the staff feel about this?"

"Myself, I would answer it [questions that ask for personal information], but I know of a lot of people that would feel that it's none of your business and they wouldn't want to answer it."

"You should definitely ask - I personally would be happy to tell my landlord [about personal information] or my personal problems, but I can understand why other people would find that too intrusive. But I think that you should offer to take that information and say if it would improve the service that they received because they've got extra information. But it should never be forced, and it should never be encouraged. There should be a way for people to step out of that option immediately. If someone says no, then that's the end of the conversation."

3. Engagement with tenants

Our residents told us that they thought it would be helpful to retain the stipulation about how often residents should be consulted on the best way to involve residents in scrutiny and governance. They suggested it would be useful to review this annually.

4. Information about landlord services

Our residents told us that they are more likely to be interested in information about their local area and neighbourhood rather than organisation-wide info.

6. Complaints

We agree with the renewed focus on complaints. Our residents were in absolute agreement this should be an area of regulatory focus. The consensus was that residents should have a single point of contact for their complaint. Notably, the complex systems that RPs have was a point of concern:

"I want them [the regulator] to be able to look at all the different complaints [processes at RPs] and be able to scrutinise it, to say no, that's not good enough."

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"I think you should be made more accountable for it [complaints]. You know, if you're not addressing the complaints and the issues, then yeah, the standards will make you more accountable. And I think that is a good thing to do."

7. Self-referral

We believe that resourcing on the part of both RPs and the Regulator of Social Housing will make it unlikely for RPs to meet specific expectation 2.6.1. The code of practice makes clear that RPs will be expected to communicate all 'material' instances of a breach of the Standards, and to contact the Regulator to discuss matters where it's unclear whether an issue is material. It would be helpful if at least some guidance on what is a 'material issue' was provided in the Code of Practice.

3. Do you agree that the proposed Transparency, Influence and Accountability Standard accurately reflects the government's ['tenant involvement' direction to the regulator](#)?

Agree.

Yes, Southern Housing believes the proposed Transparency, Influence and Accountability Standard as drafted reflects the direction to the regulator from the government.

Neighbourhood and community standard

4. Overall, do you agree that the proposed Neighbourhood and Community Standard sets the right expectations of landlords, as set out in Chapter 8 of the consultation document?

Disagree.

While we agree with spirit with which the proposed Neighbourhood and Community Standard is intended, we do not believe in its current drafting it sets the right expectations. Below we set out areas of significant comment or concern.

1. Maintenance of shared spaces

This is an onerous ask. We have hundreds of superior landlords and many more estates where we have adjoining 'partners'. We believe it is more practical to have an approach where liability is restricted to areas in the ownership of a registered provider.

The Code of Practice does not support understanding of what level of cooperation will be expected. There is some overlap between shared spaces and communal areas which need clarification - please see further comments made in answer one relating to terminology used by the regulator. Internal shared spaces can also be prevalent

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and therefore it would be helpful for the regulator to clarify the definition of shared spaces to avoid confusion and misinterpretation.

Section 106 schemes for example mean that there can be substantial overlap between external managing agents (EMAs). Internal shared spaces are also common, so the regulator should further explain the meaning of shared spaces to minimise confusion and misinterpretation, as we set out in further detail in our response to question one.

Our residents raised concerns that responsibility does not always fall under our control, and some agencies partly responsible for shared spaces are not subject to the Regulator of Social Housing. These could include for example local authorities or Network Rail. We share such concerns.

“I do think that's [the standard] going to be a problem. It's OK asking the housing association to be responsible, but it's the other local authorities... I mean from my own personal experience, even the railways: the footpath that runs down one of the estates, they [Network Rail] let it overgrow. There're nettles, there's lighting that's busted. Are they going to sort it out? No. So the standard, it's okay for you to work with them. But are they working with you? I feel not. Over the years [it's clear] they don't care. Not the housing associations, but the other authorities whether it be the railway, the local council, highways. Are they getting the same standards that are being given to you? No. So you're [housing associations] knocking your head against a brick wall sometimes I feel.”

Role of residents

Also among the feedback from residents was that the regulator should also encourage landlords to remind residents about the importance of using shared spaces responsibly, which we agree with. They told us that:

“I actually think in the standards there should be more of a standard on the tenants to be honest. The housing association maybe needs to enforce or do something to make sure tenants are respecting the shared spaces and communal areas because a lot of the troubles are from some individuals that don't have respect or aren't being responsible for the upkeep of their areas.”

“We don't expect the Housing Association to have all the answers and they can't be responsible for everything. And I agree that, you know, the tenants have a responsibility as well.”

2. Local cooperation

It is encouraging to see that expectation 2.2.1 on local cooperation states that registered providers' strategic objectives and “presence within the areas they provide social housing” should be considered alongside tenants' views. Differing stock levels

across geographies make this inclusion essential. The ability of RPs to liaise with other parties is likely to be influenced by the number, type, and tenure of the registered providers' homes in the immediate area. For example, if a registered provider is a landlord for a small number of street properties, there may be little impact they can make.

3. Safer neighbourhoods

On page 17 of the consultation summary, the Regulator says that *"landlords need to support tenants affected by anti-social behaviour. This can include vulnerable people who behave anti-socially."* Point 59 of the Code of Practice states that *"registered providers should consider how they support vulnerable perpetrators of ASB, to help them to sustain their tenancy."*

We believe further clarity is needed on this point as these expectations do not appear to be within any of the five specific expectations on safer neighbourhoods in the draft Consumer Standards themselves. If this is the intention – which we believe would be difficult to balance especially with the victim-centred approach set out elsewhere in the document – then this needs to be clearer in the Standards themselves.

Delays in removing risk

There are unfortunately occasions when the risk to tenants is another tenant, whether due to antisocial behaviour or another issue. Delays in the court system can sometimes mean that removal or separation of tenants is not immediately possible despite our best efforts, even when it is in the interests of other tenants' safety. We are fully aware that it is not within the power of registered providers, nor of the Social Housing Regulator in the creation of the new Consumer Standards to reform First-tier Tribunals and the county court system. However, it could be useful for the Regulator to acknowledge the issues that chronic backlog and delays are causing and suggest what it would consider appropriate mitigation measures in the Code of Practice.

4. Domestic abuse

We agree with both the principle and required outcome (1.4.1) relating to domestic abuse. We believe it is fundamental for all registered providers to have a separate and specific, victim-centred policy and being an integral part of the coordinated community response in tackling domestic abuse. This standard ensures all registered providers would be able to provide the most basic support for victims/survivors. RPs will be reliant on support from external strategic partners including local authority safeguarding teams for this to be successful.

Tenancy Standard

5. Overall, do you agree that the proposed Tenancy Standard sets the right expectations of landlords, as set out in Chapter 9 of the consultation document?

Disagree.

Southern Housing is supportive of the proposed standard overall. However, we believe there's an implied assumption of general needs tenancies within the drafting of this standard. The Standard needs to be written in a way that reflects the multiple tenancies within the diverse housing sector. While not wishing to be prescriptive, it would be helpful to see supported housing and older people's accommodation included in the Standards themselves and the supporting Code of Practice.

We also understand that the proposed standard is written under the current regulatory framework and will therefore change again once the Renter's Reform Act comes into effect. Accordingly our comments are minor as we await further legislative reform.

1. Allocations and lettings

We would suggest that the same wording from the current standards and specific expectations is added back in, which would mean the inclusion of the phrase *"registered providers shall develop and deliver services to address under-occupation and overcrowding in their homes within the resources available to them"*. Our residents agreed with the push towards allocating adapted homes to households needing those adaptations in the interests of value for money:

"I think on allocations and lettings, I think that's a good thing that the regulator is making sure it's emphasised that the right housing goes to the right people, especially if it's a house that has adaptations. The people that need that should have that. That [the standard] should be put in place."

2. Tenancy sustainment and evictions

As the Regulator will be aware, some occupiers are excluded from protection under the Protection from Eviction Act 1977. They can be evicted without a court order once their tenancy or licence ends. While the landlord – or in this context, Registered Provider – needs to give notice, they can do so to end a periodic tenancy or licence, or to end a fixed term early using a break clause or forfeiture clause. This can include in supported housing where there are licence terms attached to the provision. We believe the wording of clauses 2.2.1 and 2.2.2 requires further clarification to make clear the exclusion of tenancies other than general needs tenancies. While the Code of Practice does this to an extent, it is meant to be supplementary document only. Clarification on how the Regulator expects this to work for shared owners, who have a more complicated legal arrangement, would also be helpful.

4. Mutual exchanges

We support the current draft. Our residents told us they thought RPs should do more to facilitate exchanges, including by being more flexible over rent arrears for exchanges to go ahead.

“On mutual exchange, as much should be done as possible to help people that want to mutually exchange and any small barriers that are in the way then Southern housing should try to help the resident overcome their barriers to make that exchange happen quicker.”

6. Do you agree that the proposed Tenancy Standard accurately reflects the government's 'mutual exchange direction'?

Agree.

Southern Housing believes that the proposed Tenancy Standard as drafted does reflect the new direction from government.

Code of Practice

7. The proposed Code of Practice is designed to help landlords understand how they can meet the requirements of the standards. Do you agree that the proposed Code of Practice meets this aim?

Disagree.

Southern Housing agrees with the Regulator's intention – as stated in public forum webinars and in other communications – that they want to help Registered Providers understand *what* they need to do, but not dictate *how* they achieve this. However, we feel that the proposed Code of Practice does not adequately help landlords understand how they can meet the requirements of the standards.

Given the regulator can give regard to the Code of Practice during cases, there needs to be more detail on how the standards can be met in complex situations. As discussed in answers to earlier questions of this consultation, these complex situations can involve multiple tenure types, contractors, a differing freeholder and multiple registered providers. We understand that the Code of Practice is indicative of compliant behaviour and is certainly not intended to be exhaustive but would assume that if we are not following this, we may need to evidence why – even if we are compliant with the standards themselves. If this is not the case, we would welcome an additional clause that states this in future drafting.

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With this in mind, we feel that the starting assumption of a general needs tenant in an RP owned and managed home is an unhelpful general setting for the examples in the Code of Practice. More attention needs to be paid in the Code of Practice to situations where, for example, there are competing needs in an equalities sense, or where what would be quick and helpful for the tenant is not possible due to the complexities surrounding unpicking legal agreements around access issues.

There are many complex settings, with multiple landlords, multiple tenures, as well as managing agent schemes that can complicate things. These situations have arisen over time, and in some cases exist because RPs have been trying to create more opportunities to provide new affordable homes in a complicated economic and political environment. Nonetheless, these situations exist, and it is unlikely that the sector will significantly move away from such complexity. The Code of Practice would be more useful if it were to consider the Standards considering these arrangements and offer examples in situations where there is either a dispute over responsibilities or if contracts are not clear considering new regulatory arrangements.

There are also instances where it appears Code of Practice amplifies rather than supports the Standards. For example, the notion of “prioritisation of services” in point 19 in the Repairs, maintenance and planned improvements section of the Code of Practice goes over and above that of the Standards. Point 2.3.5 in the Standards states *“Registered providers must ensure that the delivery of repairs, maintenance and planned improvements to homes and communal areas is informed by the needs of tenants and provides value for money, in addition to the [stock quality] requirement at 2.1.2”*. Prioritising services based on need rather than “order raised” has the potential to fundamentally change services provided.

Regulatory & Equality impact assessments

8. A draft Regulatory impact assessment has been produced to help in understanding the costs, benefits and risks of introducing a revised set of consumer standards and code of practice. Do you agree with our conclusions in the draft Regulatory impact assessment?

Southern Housing has no comment on the draft Regulatory impact assessment.

9. The draft Equality impact assessment looks at what effects introducing the consumer standards might have on members of groups that are protected by equality laws. Do you agree with our conclusions in the draft Equality impact assessment?

Southern Housing has no comment on the draft Equality impact assessment.

Appendix 1.

Findings of Southern Housing's consultation of residents

In preparing our consultation response, we held a focus group style meeting of residents (a roughly equal mix of tenants and shared owners). We presented the proposed changes from the Regulator and went point by point to hear their views. The consensus was that the proposed Consumer Standards were largely appropriate, and they welcomed the prospect of more proactive regulation of the sector.

1.1 Stock Quality

There was unanimous support among residents we consulted for the new Consumer Standards to include a requirement for RPs to inspect the inside and outside of all homes for which they're responsible. Our residents were keen for us to maximise value for money when we do this.

1.4 Repairs, Maintenance and Planned Improvements

Residents told us that Registered Providers need to retain some flexibility so residents can schedule their own appointments. The focus shouldn't necessarily be on outright speed if that is to cause inconvenience to the resident.

2.2. Diverse Needs

Our residents told us they were cautious about the Regulator asking RPs to collect personal data on tenants. They felt strongly that RPs need to be crystal clear why we're collecting the information and how we're using it. They suggested that we should offer a range of different ways for residents to provide the information to us.

2.3 Engagement with Tenants

Our residents told us that they thought it would be helpful to retain the stipulation about how often residents should be consulted on the best way to involve residents in scrutiny and governance. They suggested it would be useful to review this annually.

2.4 Information about landlord services

Our residents told us that they are more likely to be interested in information about their local area and neighbourhood rather than organisation-wide information.

2.6 Complaints

Our residents were in absolute agreement this should be an area of regulatory focus. The consensus was that residents should have a single point of contact for their complaint. Notably, the complex systems that RPs have was a point of concern.

3.1 Shared Spaces

Among the feedback from residents was that the regulator should also encourage landlords to remind residents about the importance of using shared spaces responsibly.

There was recognition from the residents that we spoke of the difficulty in competing responsibilities. They rightfully raised concerns that responsibility does not always fall under our control, and some agencies partly responsible for shared spaces are not subject to the Regulator of Social Housing.

4.1 Allocations and Lettings

Our residents agreed with the push towards allocating adapted homes to households needing those adaptations in the interests of value for money.

4.4. Mutual Exchange

Our residents told us they thought RPs should do more to facilitate exchanges, including by being more flexible over rent arrears for exchanges to go ahead.