![Sheffield City Council]

Executive Director/Director
Non-Key Executive Decision Report

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Report to:	Director of Housing and Neighbourhoods Service
Date of Decision:	5th November, 2018
Subject:	Response to A new deal for social housing, Government consultation.

Which Cabinet Member Portfolio does this relate to?
Neighbourhoods and Community Safety

Which Scrutiny and Policy Development Committee does this relate to?
Safer and Stronger Communities Scrutiny and Policy Development Committee

Has an Equality Impact Assessment (EIA) been undertaken?   Yes [ ]   No [X]

If YES, what EIA reference number has it been given?   *(Insert reference number)*

Does the report contain confidential or exempt information?   Yes [ ]   No [X]

Purpose of Report:

The Government is currently consulting on 'A new deal for social housing' their Green Paper which sets out a new vision for social housing. The paper comes following the tragedy at Grenfell Tower which elevated the significance of social housing. It is the result of a significant amount of consultation with residents which has helped inform and shape the principles in the paper. It proposes a rebalancing of the relationship between residents and landlords. Government want to ensure that social homes are safe and decent, that issues are resolved and resident's voices are heard. They feel that there is a need to tackle the stigma that is associated with social housing and want to build good quality social homes that people need.

The paper is based around five principles which, it says, will underpin a new, fairer deal for social housing residents:

- A safe and decent home which is fundamental to a sense of security and our ability to get on in life;
- Improving and speeding up how complaints are resolved;
- Empowering residents and ensuring their voices are heard so that landlords are held to account;
- Tackling stigma and celebrating thriving communities, challenging the stereotypes that exist about residents and their communities, and
- Building the social homes that we need and ensuring that those homes can act as a springboard to home ownership.

Each chapter is based around the principles above and details a raft of proposals for consultation. There are 48 questions to respond to and Appendix A of the report sets out the Council's proposed response.

Recommendations:

1. That the content of the responses provided in Appendix A are approved as Sheffield City Council's response to 'A new deal for social housing'.

Background Papers:

Ministry of Housing, Communities & Local Government – A new deal for social housing
https://www.gov.uk/government/consultations/a-new-deal-for-social-housing

Lead Officer to complete:-		
1	I have consulted the relevant departments in respect of any relevant implications indicated on the Statutory and Council Policy Checklist, and comments have been incorporated / additional forms completed / EIA completed, where required.	Finance:
		Legal:
		Equalities: *Louise Nunn*
	Legal, financial/commercial and equalities implications must be included within the report and the name of the officer consulted must be included above.	
2	**Lead Officer Name:** *Sally Butterworth*	**Job Title:** *Operations Manager*
	Date: *9th October 2018*	

1. PROPOSAL

1.1 The Council is providing a response to the proposals in 'A new deal for social housing consultation'.

1.2 Each chapter details a raft of proposals, exploring the supply and quality of social homes, the rights of tenants, some of the stigmas associated with social housing tenants, service management, safety issues and the wider issues of community and the local neighbourhood.

1.3 Key highlights from the Green Paper include:
- Scrapping the high value assets levy introduced in the Housing & Planning Act 2016 which would have resulted in the forced sale of deemed "high value" Council homes.
- No mandatory fixed term tenancies. Another initiative from the Housing & Planning Act 2016, now proposing to continue local discretion over the use of fixed term tenancies.
- Strengthening of the social housing regulator. Proposals within the paper to introduce a new set of Performance Indicators potentially leading to league tables and links (based on performance) to the Affordable Homes Programme.
- Proposals to revise and update the Decent Homes standard to provide consistency with private rented sector properties and respond to the need for increased safety measures.

1.4 Detailed responses to each of the questions asked by Government are contained in Appendix A.

2. HOW DOES THIS DECISION CONTRIBUTE?

2.1 The content of the Green Paper is broad and touches on many aspects of social housing tenancies including physical property issues around safety and decency as well as wider service delivery and the experience of being a social housing tenant. The Green Paper is a Government consultation and our responses to it are informed by the Corporate Plan.

3. HAS THERE BEEN ANY CONSULTATION?

3.1 The Council is responding as a consultee. Further consultation has taken place with tenants and residents at a city wide level to help inform the Council's response and these views are incorporated separately within the responses in Appendix A. Tenants and residents have also been provided with the link to the Green Paper and the consultation questions and encouraged to submit responses directly.

4. RISK ANALYSIS AND IMPLICATIONS OF THE DECISION

4.1 Equality of Opportunity Implications

4.1.1   There are no equalities implications arising from this consultation.

4.2   <u>Financial and Commercial Implications</u>

4.2.1   There are no financial implications arising from this consultation directly. Should the proposals develop into policy there, would be financial implications around meeting an enhanced decency standard. Financial implications could also arise from the potential to restrict access to the Affordable Homes Programme through the introduction of new performance measures and league tables.

4.3   <u>Legal Implications</u>

4.3.1   There are no legal implications arising from this report or the proposed consultation response. If the outcome of the consultation results in any changes to government policy on social housing the legal implications for the Council will be addressed in future executive reports.

4.4   <u>Other Implications</u>

4.4.1   There are no additional implications arising from this consultation.

5.   ALTERNATIVE OPTIONS CONSIDERED

5.1   None considered response to consultation*.*

6.   REASONS FOR RECOMMENDATIONS

6.1   That the City Council has considered the proposals and would like its response to the consultation to be considered by Government.

Chapter 1: Ensuring homes are safe and decent

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

Sheffield City Council (SCC) has a long history of engaging with residents around housing issues and property improvements. We have consulted residents about issues raised in the Green Paper at our Housing Neighbourhood and Partnership Group (our monthly service improvement and engagement meeting) and their feedback has been incorporated into this SCC response.

SCC regularly uses a number of forums to discuss issues around property safety directly with residents and to find out how they would like to work with us to ensure homes are safe. The following issues are future priorities for SCC and we feel demonstrate good practice:

1. A review of the sign-up process and Annual Household Visit to new tenants to include discussion around key safety issues; gas, electric, asbestos and fire risks associated with their home. Introduce direct discussions to support safety leaflets within property information packs.

2. The Landlord's website could host a range of safety related information.

3. Investigating an online facility where all safety information and certification for all council properties could be hosted and viewed by customers. This would allow open access to data and provide the relevant information to prompt challenge.

4. Developing an offer to allow a request to be made for a safety check to a home to incorporate additional safety measures eg smoke alarms.

5. Consideration of a dedicated hotline/email to allow people to have a fast track route for reporting safety issues.

6. Residents should be supported and encouraged to whistleblow in confidence issues of safety created by other residents.

2. Should new safety measures in the private rented sector also apply to social housing?

Yes.

Tenant's safety is paramount and SCC agree that safety measures introduced should be tenure neutral and therefore applied to social housing. We feel that the practical application of this

measure would need to be undertaken on a risk based approach and with recognition that there will be significant resource implications. Only by having a clear set of regulations relating to safety of installations (fire / electrical etc.), can local authorities comply with these.

Whilst SCC welcomes the introduction of new safety measures for social housing, we expect that Local Authorities will be allowed to determine an appropriate implementation timeframe to mitigate the impact on existing planned 'Decency' programmes

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

The Decent Homes standards have been interpreted and applied very positively in Sheffield and when access has been provided a good standard of work has been undertaken. SCC would welcome changes to the Decent Homes standard which placed more emphasis on safety moving forward to clearer legislation for electrical testing and smoke alarms and sprinklers. Fire compartmentation also needs to become part of all maintenance works to ensure the property is not compromised and moves away from the fire safety provision when first built.

The decency standard allows landlords to self-assess their stock and during Decent Homes programmes this was subject to audits. However, since 2010 this has not been the case so this is potentially an area that needs some greater scrutiny in terms of published performance. Currently, there are parts of the standard that are open to interpretation, for example on what is deemed to be "modern".   However, the introduction of an age based assessment could result in some elements being replaced too early and some elements being in disrepair before they are repaired. A condition led approach is still preferred.

SCC are concerned that a stronger emphasis placed on Housing health and safety rating system HHSRS within the assessment, would bring additional costs to social housing landlords. Sheffield's topography means we have more steps to properties with more risk of trips and falls where handrails are absent or unsuitable and so we are more likely to have increased demands on resources than other local authorities. In terms of energy efficiency Sheffield's social housing stock performs well, the average Standard Assessment Procedure for Energy Rating (SAP) across the stock is borderline D/C. Our current policy is to get every home up to a SAP score of 65 which is a D rating and our current investment programme has projects in place to achieve this. To achieve the government ambition for all properties to be a C rating would require SCC to invest in renewable energy products and/or products such as triple glazing. Currently Energy Compliance Obligation (ECO 3), the new government challenge to the energy companies, is only aimed at properties that fall into the E, F, G category, so SCC would be unlikely to benefit from this funding. Government should therefore consider how it can better support local authorities to implement SAP improvement programmes

In addition SCC would welcome the introduction of a broader decency standard for the quality of the neighbourhood that tenants live in. For example, more emphasis on communal areas, external areas, security arrangements, environmental improvements (fencing and parking).

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

Yes.

We agree that additional measures are needed to make social homes safe. Mandatory electrical testing every 5 years should be implemented along with hard wired smoke alarms and a requirement to undertake fire safety works identified through fire risk assessments and as recognition of the importance of this appropriate funding should be provided. This needs to be coupled with appropriate support for gaining swift access to properties where residents deny it to ensure that fire safety work can be completed in a timely manner.

The legislation for inspection of the condition of asbestos currently only applies to communal areas and not inside dwellings and this could potentially be disturbed by residents. There would be an additional resource burden on social housing landlords if there was a requirement to inspect more regularly. We currently manage asbestos using a risk based approach by removing, encapsulating or sealing. There is a risk that residents would expect all asbestos to be removed resultant in a financial burden that is not currently funded.

Chapter 2: Effective resolution of complaints

5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

Sheffield City Council currently manages housing related complaints through its corporate process with the exception of the "designated person" element. The model we aim to operate is one of local resolution, with three stages - problem solving, Investigation and Investigation Review. Mediation adds in an additional stage into what residents may feel is an already lengthy process and we feel that current local mechanisms and timescales are adequate. We have seen limited value of adding the "designated person" element into the process when compared with managing complaints in our other services. The Housing & Neighbourhoods service regularly responds to Elected Member/MP enquiries on all issues within its remit so would feel that adequate mediation measures are already in place as a core part of the way we transact business.

6. Should we reduce the eight week waiting period to four weeks, or should we remove the requirement for the "democratic filter" stage altogether?

The option to remove the democratic filter is one that Sheffield City Council supports. It is difficult to determine what value this additional stage has added to a process which is already developed around encouraging local resolution at the earliest stage.

The Housing Ombudsman service should be made comparable to the Local Government

Ombudsman service as both perform the same function for different purposes. Local Housing Authorities may be subject to investigation by either body dependent upon function and residents don't necessarily appreciate the difference.

A Tenant Panel was established in Sheffield with the introduction of the designated person part of the process and tenants were advised of their right to utilise this following completion of the corporate process. We found that very few tenants took up the option of referring their complaint to the tenant panel and it was disestablished after 2 years due to lack of use. Council Housing tenants could be seen to be disadvantaged by this democratic filter as a requirement of a complaints process and building in an additional layer prior to external appeal. Its removal provides equality of access to additional resolution routes (Ombudsman service) which are currently available to users of other services.

Locally we support responses to enquiries received from elected members and MPs and this will continue even if the democratic filter process is removed.

7. What can we do to ensure that the "designated persons" are better able to promote local resolutions?

Locally, training and briefings were provided to all Councillors when the Designated Person role was introduced, and newly elected Members have been briefed annually since this point. There has been no direct engagement or briefings with MPs however, MPs continue to raise complaints on behalf of their constituents and they are dealt with in accordance with our local procedures.

To supplement this government could provide direct support and training to Local Councillors and MPs which would also help to deliver a consistent service nationally.

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

Sheffield's standard complaint response templates and 'what next' factsheet include details on escalation as does the Council's website and we feel this offers clarity. This is included with all Investigation Review responses so information is provided to every individual. Quality checks on responses and signposting take place as part of a routine process and this provides confidence that the correct complaints information is being shared.

A wealth of information is provided to tenants at sign-up and they are signposted to the Council's website to access a range of additional guidance which is not included in paper format. It would be possible to include the Council's complaints process and escalation as part of this list of useful information that tenants are signposted to.

An awareness campaign could be appropriate although different Housing organisations will have different complaints processes. Any campaign should be generic with messages around "you have the right to complain", "if you aren't happy with how your complaint has been dealt with you can go to the Housing Ombudsman". Any campaign is likely to lead to an increase in initial enquiries/complaints so both local organisations and the Housing Ombudsman would need to be adequately resourced to be able to respond in a timely manner.

The Housing Ombudsman could provide a general standard on how it expects housing organisations to promote their complaints process if there is a desire to provide consistency nationally.

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

As above in question 8, a wealth of information is provided to tenants at sign-up and they are signposted to the Council's website to access a range of additional guidance which is not included in paper format. It would be possible to include the Council's complaints process and escalation as part of this list of useful information that tenants are signposted to.

As part of the role of Neighbourhood Officers in Sheffield annual visits are undertaken to tenants within a defined geographical patch. Information on local community and voluntary organisations is provided as part of this visit and it is possible to incorporate organisations who advocate or provide advice on complaint processes on to this list. However, if there is appetite to make further use of local organisations for this purpose they would need to be resourced appropriately.

10. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?

Overall our response time for Housing formal complaints remains good and within the Council's 28 day target. Based on the last financial year the majority of our complaints are dealt with informally in 6 days for Council Housing. Limited resources affect our ability to deal with complaints more speedily than we do currently and it is felt that the 28 day resolution target for formal complaints is a reasonable figure when compared with other housing providers and private sector organisations.

If there was a desire to ensure that timescales for complaint handling were consistently met, the Ministry of Housing, Communities and Local Government would need to consider whether it wants to put in place a mechanism for measuring and reporting performance against a statutory guideline or make it a regulatory requirement.

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

As above in question 1. Point 5 Consideration should be given to a dedicated hotline/email to allow people to have a fast track route for reporting safety issues and resourcing corresponding timely responses. In addition at a local level organisations could be required to flag whether a complaint includes a safety concern, which could be screened out and potentially given prioritisation. Should complaints be escalated to the Housing Ombudsman, this service should prioritise safety related complaints.

During September/October Sheffield held a number of workshops with tenants around some of the themes within the Green Paper. The following comments are those made by residents in Sheffield around the theme of complaint resolution:

- The complaints process is often confusing and tenants are unsure whether they are making a request for service or complaining about a service received. Examples were provided around this in relation to repairs.
- There is limited experience of using the "Designated person" as part of the process and many do not know that this option exists. There is a general lack of knowledge of how the process works and a consensus that many tenants don't know their rights regarding complaints.
- For those that had some experience of the complaints process there was a feeling that there were issues around ownership and complaint management particularly where a complaint spanned more than one service.
- Feedback suggested that there was a lack of visibility around any changes made to services and learning taking place to address the root cause of the complaint.
- Views were aired to suggest that there is not enough done to respond to the needs of anyone who requires additional support to make a complaint.
- Some local Tenants & Residents groups have tried to facilitate their own problem solving by starting a drop in surgery with local Councillors attending and Council staff and through word of mouth this has had good attendance.
- Tenants feel that knowing which staff to contact and having direct access to some key people can help tenant representatives resolve complaints locally.

Chapter 3: Empowering residents and strengthening the Regulator

12. Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?

Yes

We feel the proposed key performance indicators do cover the right areas. In Sheffield, the quality of the repairs service is the most important issue for tenants. Neighbourhood management specifically ASB / low level crime is also high on the list of issues tenants mention on our neighbourhood survey. Indicators where the housing organisation does not have full control over improvements will be difficult to measure and take responsibility for change. We feel neighbourhood management needs close working with the Police and other agencies who may not see it as their priority. A combination of qualitative and quantitative methods would provide a balanced view of services. Respectful and helpful engagement is already asked as part of the Star survey (our Neighbourhood Survey) on tenants satisfaction with helpfulness and politeness of staff and if they feel they are listened to. Managing a good housing service is more than just these issues so it would be important that a focus on one set of indicators that are publicly available is not at the detriment of others such as income generating ones.

Yes

Estate Management should be included. This is an area that is important to our tenants as captured in our Neighbourhood Survey – 1,729 comments out of 4,757 (36%) were about environmental issues, followed by 1,087 comments relating to repairs (23%). An appropriate measure would be around satisfaction with estate related services or area.

13. Should landlords report performance against these key performance indicators every year?

Yes. The Council already reports performance information annually to tenants through its annual report and could submit these to the regulator.

14. Should landlords report performance against these key performance indicators to the Regulator?

Not sure

It's unclear that there will be sufficient benefit to tenants or the service for what this is likely to cost (based on the contribution made annually to the Housing Ombudsman of over £50K).

If the intention is to make the information publicly available so tenants can see their landlords' performance against others then this is probably the best option unless an independent organisation is commissioned to undertake this work. Members of HouseMark have the option to make their data available to tenants now, so it may be worth investigating if using an established benchmarking organisation would be more cost effective than resourcing the regulator to perform the role. A regulator with this level of increased responsibility would need resourcing adequately as well as resourcing within each organisation.

However, simply publishing the data is unlikely to have much value unless it gives the sector the push to improve performance. Linking performance to the SOAHP will only motivate landlords with a strong ambition to build new affordable homes.

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

In Sheffield we see the value that tenants bring in helping improve services and tenant engagement is embedded in our culture. We believe guidance for landlords rather than regulation is more likely to bring about greater transparency. Any method for reporting performance needs to be as simple as possible to use to encourage landlords to comply and tenants to challenge services to improve.

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

No

We currently publicise our complaint handling to tenants via the annual report and details are also included in the Council's overall complaints annual report which is available via the website.

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

Yes

We feel that the Regulator is best placed to prepare key performance indicators in consultation with residents and landlords; however we recognise organisations such as HACT and HouseMark have already done a lot of work to get agreed sector scorecards. We therefore would recommend using their expertise and experience as well as input from landlords and tenants. The value of any performance indicator is completely dependent on the quality and consistency of the data so considerable work needs to go into this.

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

Making an effective comparison of performance is going to be difficult with organisations having different stock sizes, stock types, ages of stock, type of organisation, different priorities and issues and differing tenant profiles. A league table of headlines often doesn't tell the full story (context and a narrative of a particular situation is needed to really understand them) so league tables can be misleading but the fact that an official body is publishing them gives them credence.

Our experience of sharing performance information with tenants is that they do not find it easy to understand and even more so when comparative data is added in. Our tenants chose not to add benchmarking information into our annual report to council housing tenants as they told us it was confusing

If a league table is chosen, being able to compare like for like in terms of size or type of organisation would make it more meaningful. The limitations of league tables should also be highlighted.

We would welcome consideration of using alternative ways of publishing performance other than a league table. An option could be to publish data in a way that allows comparison of a provider's performance over time to see if improvements are being made rather than a comparison with others. Broad categories (upper/middle/lower quartile) could also be used as an alternative to precise rankings.

As social housing is not a market, few tenants are able to use the information in a league table to vote with their feet and find a new landlord although it would allow them to see how someone else is doing and challenge their landlord on performance.

Consistent housing data standards will be critical with data collection and validation that is rigorous so that everyone is confident that there is no manipulation of data to improve a position on a league table. This would be particularly important if funding is being linked to this.

More statistical analysis models that allow for differential performance could be investigated. Statistical process control theory uses the same data that is used to produce league tables to create control charts with upper and lower limits of variation. This gives no rankings but makes any outliers easy to identify.

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

Yes. This should be linked to the regulatory framework and take a standardised, balanced resident view of Landlord services. As highlighted above, the introduction of league tables needs to be balanced and their limitations acknowledged.

20. 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?

We already offer tenants a range of options to get involved in scrutinising the delivery of housing services locally – tenant inspectors, 'Challenge for Change' Scrutiny group (a topic focused resident group that scrutinises services and recommends improvements and delivers reports on its findings to the Council's Safer and Stronger Communities Scrutiny and Policy Development Committee) ,scrutiny at the Housing & Neighbourhoods Advisory Panel (a monthly meeting of tenant representatives and the relevant Cabinet Member to discuss, scrutinise challenge and advise on housing issues). There is always more that can be done and we are in the process of reviewing our current approach. However resident engagement and scrutiny relies on the input of volunteers who are prepared to give up their time and energy – often on top of their local activities with their tenant and resident associations. Volunteer fatigue is a real issue for us. Greater clarity over the regulatory framework – which is currently vague and lacking in focus – will also help to direct the future focus of engagement and scrutiny. To raise awareness it is necessary for:

- Residents to be clear about what level of service they should be getting and what to do when expectations are not met

- Create a range of opportunities for residents to make their views known and promote them

- Support residents to have the confidence and skills to hold the service to account

- Services need to be responsive and use what residents tell us to make improvements and show how services have changed

- Tenants should be involved throughout the service if the landlord is a local authority or organisation for other social landlords – scrutiny, procurement, new polices, recruitment, on boards/task groups.

21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?

Yes.

The best way to achieve this is to build on the existing national engagement structures that give tenants a voice – for example, the ARCH Tenants Board – and give them more direct access to Ministers and policy makers. Additional training and support should be provided and funded through independent organisations such as TPAS.

22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?

No not at this stage.

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

Yes

24. Are Tenant Management Organisations delivering positive outcomes for residents and landlords? Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?

Sheffield City Council has limited experience of managing or working with Tenant Management Organisations and no recent experience post 2007. Although establishing Tenant Management Organisations was simplified through the Localism Act 2011, no resident led organisations have approached the Council to look at establishing one. Our previous experience suggests that Tenant Management Organisations can work (in Sheffield one was wound up post 2007 and another continued but both were subject to stock transfer) however, this can be dependent upon size, stock condition, demographics and the willingness to own the process.

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

Don't know

What is important in giving choice and control to residents is what works locally not whether the solution is innovative and it is this that Government should be encouraging.

26. 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?

Yes.

For this to work, tenants need access to professional support to understand their responsibilities. This could range from initial advice and start-up grants through to partnerships with community and voluntary sector to develop and deliver their own services. Legislation already exists to support residents of council housing to take responsibility for services within the Localism Act 2011 which established the Community Right to Bid. The need to promote and raise awareness around this ability should be considered.

27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

We already involve tenants and leaseholders on contractor selection tender panels looking at quality submissions for work and feel that this is a model that should be adopted across the sector. There can be conflicting issues around political decision making and preferences for certain providers which potentially could limit or remove choice from tenants. However, if a service did not meet national minimum standards set by the regulator there should be a mechanism in place to change this. As a Local Authority landlord we are subject to different regulation and statutory overview and scrutiny functions, and scrutiny should be possible through our engagement forums. This requires services to be more respectful of the tenant voice and these services need to be more accountable.

There is some concern over the proposal within the Green Paper to look at providing a regular choice of contractors for residents which could be burdensome to administer. The Council delivers an in-house repairs service and many Registered Providers will have preferred contractors who are providing a holistic repairs service. The effort should be based around ensuring that residents have input into initial contractor selection as opposed to scattering the contract amongst many providers which potentially weakens performance scrutiny and economic viability of contracts.

28. What more could we do to help leaseholders of a social housing landlord?

The legislation around Leaseholders is already prescriptive and clear around the tendering process and engagement for major works. Powers also exist to alleviate the impact of large service charge bills. Prescribed information exists for those exercising the Right to Buy, however, it would be possible to include more information around leaseholder rights and obligations.

29. 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 residents in line with the new key performance indicators proposed, and if so how?

Yes.

We feel that current regulatory standards are vague and open to interpretation. This makes it very difficult for tenants and residents to understand the level of service that they should expect from landlords. The standards need to be clearly linked to the proposals around KPIs to ensure a comprehensive merger of the standards and expectations on landlords. The standards also need to be grounded in the day-to-day services that matter to tenants and written in appropriate language. A single Consumer Standard covering the full range of housing management functions may provide greater clarity and transparency for tenants

30. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?

Yes.

Tenants need to have easy access to information on what 'good' looks like. One of the benefits of the previous Audit Commission inspection regime was that it provided access to these examples for both tenants and organisations and set the aspirational direction for change.

A Code of Practice or good practice examples such as those contained in the Green Paper consultation document are one way of doing this. Another alternative is to link through to existing good practice websites, for example Housemark or the CIH, where examples are constantly updated. We would welcome the opportunity to be involved in developing such a Code.

31. 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?

No.

We support the ability of the regulator to intervene where that threshold and corresponding intervention is proportionate. We feel that maintaining the serious detriment threshold but reviewing the current definition of serious detriment may be a way forward as the threshold feels too high.

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

Yes.

Interventions should be linked to the 'serious detriment' threshold. The publishing of KPIs gives tenants the context for assessing landlord performance as well as giving the Regulator a comparator to understand whether there is a serious risk of detriment. However KPIs can be a blunt tool in assessing local issues. Context and environment have to be taken into account

rather than just relying on numbers. The regulatory framework needs to have a mechanism for assessing this context.

33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?

We understand that there is a difference between the regulation which applies to Local Authorities and that for Registered Providers due to the difference in nature of these organisations. Local Authorities are accountable to the electorate and subject to scrutiny and other statutory controls. Registered Providers are only accountable to the regulator and therefore it is felt appropriate that this requires a greater depth of regulation. Regulation should certainly be no greater for local authorities. The Government already has in place mechanisms to scrutinise the effectiveness and probity of local authorities as a whole. The increasingly integrated nature of local authority run housing services means it would be difficult to disentangle and tackle poor performance issues impacting on the delivery of the housing services from the wider local authority framework. This will require the regulatory framework to consider these subtleties when scrutiny is being applied to local authority run housing services – particularly when it comes to any future incarnation of the economic standard.

34. Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?

Yes.

35. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arm's Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?

Local Authorities exercise control over the companies it owns as set out in Local Government and Housing Act 1989, Part 5. This framework is robust and provided that a sufficiently robust management agreement is in place and the Local Authority is willing to exercise its powers, should be adequate.

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

None.

During September/October Sheffield held a number of workshops with tenants around some of the themes within the Green Paper. The following comments are those made by residents in Sheffield around the theme of empowering residents:

- Tenants are keen that organisations increase their awareness of language use and try to make things as accessible as possible using plain language. There can be a divide between staff and tenants and language can form a barrier.

- Tenants can find it difficult to contact the right people and tenant activists are keen to have greater direct access to key staff members to support them with their problem solving role.
- There is a requirement for residents to offer more opportunities for engagement and feel that some mechanisms are currently disjointed.
- The Housing+ approach in Sheffield is delivering greater accessibility to Neighbourhood Officers and some tenant representatives feel that having a named Officer responsible for a geographical patch has delivered improvements.
- Tenants feel that frontline staff should have more flexibility around contact and engagement with representatives rather than having to follow a corporate policy.
- Tenants felt that they were best placed to determine local decisions affecting improvements or service delivery to their homes as they knew their communities best.
- Tenants wanted more flexibility around their own organisations and for the Council to recognise differences in organisations based on local issues and demographics.
- Tenants felt that there will be positive engagement if attendees feel it is meaningful and have input in the decision making process which could require a change in culture to "ask" rather than "tell". They wanted to see what difference their input makes and then use this to publicise and encourage engagement.
- Engagement mechanisms need to be appropriate – one size doesn't fit all. There needs to be recognition that for some groups additional support is required to encourage and facilitate engagement to make it accessible.

Chapter 4: Tackling stigma and celebrating thriving communities

37. How could we support or deliver a best neighbourhood competition?

These initiatives are best delivered locally. We already run a very successful and popular garden competition to celebrate the creativity and pride of our tenants. Support is needed through both recognition and funding from Government. These activities are important but they are often competing for both funding and resources with core services. This needs to be acknowledged by both Government and the Regulator to force change. We have the infrastructure to deliver – we need the recognition and permission.

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

Positive media campaigns, whilst important, are only ever a sticking plaster. The way to reduce stigma is to ensure that social housing organisations have access to funding and resources to improve the quantity and quality of social housing available to local people. That can only be achieved through funding for new and improved social housing.
Government have a role to play is promoting social housing as a positive tenure of choice not housing of last resort. The proposal to remove mandatory fixed term tenancies within the Green

Paper is seen as a positive step to support strong and stable communities where people are able to settle and create a home as opposed to accept a short- term place to live.

Within the Allocations Policy in Sheffield we actively promote social housing as a tenure of choice and continue to be committed to lifetime secure tenancies.

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

There is already an expectation within Sheffield City Council that all staff deliver a good quality of service to customers. This is a key part of the training and supervision framework. Embedding this aspect of housing management in the regulatory framework is a good way of demonstrating that the Government has a commitment to this and recognises this as a fundamental part of the service that tenants and leaseholders should expect. The further professionalisation of housing management is indeed required. The profession is still not recognised by employers in the same way as Environmental Health both in pay and status. Joint working by Government, the CIH, universities, colleges and employers is required to promote careers in housing and to drive change.

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

From a customer perspective, it would be useful to measure satisfaction with the management of a neighbourhood. This would restrict the measure to landlord's responsibilities; or a percentage measure of satisfaction with the neighbourhood as a place to live. This would help to provide a better overview of satisfaction and a landlord's role in working with partners to make somewhere a good place to live. However the accuracy of attributing any measure such as this to a particular landlord is problematic on mixed tenure estates or those subject to significant Right to Buy. Some of our estates have up to 9 active social landlords providing management activities. It would be difficult to judge any particular score based on neighbourhood satisfaction without the context of understanding the tenure and management pattern of an area.

41. 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?

We work with tenants to offer community grants, support with financial inclusion, help to tenants to get on-line, assistance with social isolation and help to manage gardens. Landlords have to balance between supporting essential but non-core activities and being seen as diverting resources away from their key landlord responsibilities.

One part of the solution to many of the issues raised in Chapter 4 is to make tackling stigma part of these key landlord responsibilities. An increased emphasis on delivering social value – environmental improvements, neighbourhood pride, cohesion and financial and social inclusion – has to become part of the expectations of all social housing providers rather than simply an 'add-on'. Putting these expectations at the heart of a properly funded and regulated social

housing offer will do more to tackle stigma and isolation that a short-term media campaign or competition.

42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?

In Sheffield we have a comprehensive partnership approach at both strategic and operational levels:

- Social Landlords (both Local Authority Housing and Registered Providers) are represented on the statutory Community Safety Partnership

- We have a multi-agency Anti-Social Behaviour and Community Safety Team comprising staff from the Council, Police, Probation and NHS which has responsibility for addressing priority issues across the city and supporting local services

- Frontline council housing Neighbourhood Teams have strong partnerships with the local Police teams, other organisations and council teams and social landlords.

We already measure customer satisfaction with our ASB service to individual customers via an independently run telephone satisfaction survey and use this feedback to shape future services. Sheffield currently ask the following questions which could be rolled out to others:

- Taking everything into account how satisfied or dissatisfied are you with the outcome of your anti-social behaviour complaint?

- Taking everything into account how satisfied or dissatisfied are you with the way your ASB complaint was dealt with?

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

Sheffield is delivering new council homes to lifetime homes standards to provide a home that is suitable for adaptation and to allow people to stay within neighbourhoods that they know, supporting independence. We feel that this is a standard that demonstrates good practice and would like to see this replicated across other providers and regions. We would also like to see a reinstatement of national spatial standards for social housing such as Parker Morris.

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

Sheffield is committed to engaging with residents in every stage of the planning and design of new homes and is making this commitment in our developing housing strategy and new build delivery programme. This has proved crucial when development extends existing residential areas so that residents are influencing and helping to model future provision which complements existing provision and addresses the gaps that those communities have identified. It is important that each development has a clear resident engagement plan that sets out when and how residents can influence each stage.

During September/October Sheffield held a number of workshops with tenants around some of the themes within the Green Paper. The following comments are those made by residents in Sheffield around the theme of stigma:

- Sheffield tenants reported that sometimes they do feel stigmatised often by people who have no connection or real understanding of the area.
- Parachuting funding or new initiatives into areas by external organisations was seen as contributing to the stigmatisation. Tenants wanted to be supported to develop their own solutions and for development to take place at grass roots level. This would ensure real ownership and give projects more chance of success.
- Language and tone used by external organisations including Council staff was flagged an issue which also contributed to stigmatisation.

Chapter 5: Expanding supply and supporting home ownership

45. 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.

We would like to see a level playing field for all providers in the development of new social housing.

46. How we can boost community-led housing and overcome the barriers communities experience to developing new community owned homes?

There are a number of barriers to developing new community owned homes. There needs to be investment in volunteers to support the skills required to take forward true community-led projects, both to spark their initial interest and to combat fatigue. This investment comes in the form of access to professional expertise as well as finances and further grants to support scheme viability. Government needs either to enable local authorities to provide this expertise or encourage the community and voluntary sector to fill this gap.

Amendments to the Self Build and Customer House Building Act 2015 could be made to give greater emphasis to community housing and practical support over individual developments. Greater support and advice could be given to Community Land Trusts and encouragement to support the uptake of the right to build under the Localism Act.

47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given

Longer-term certainty and control over finances is a pre-condition to local authorities playing a significant role over increasing social housing supply. The recent announcement regarding the lifting of the borrowing cap is of course encouraging although we wait with interest details of what this will mean for Sheffield. The other key component is clarity and ideally freedom over rent setting policy. Although we now have greater certainty over the next 5 years, the impact of the 1% reduction continues to be felt and has had a devastating impact on our ability to build. If these conditions are met, then the limiting factor will be local land supply and infrastructure. We are formulating a 'New Homes Delivery Plan' currently to address these issues and set out our ambitions for affordable housing in the City. Our ambition is to double the supply of new social housing in the City over the next 5 years.

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

We are at the start of the journey with a directly delivered Council shared ownership product and are currently developing our preferred model. Beyond ensuring that support is consistently applied and available to both Local Authorities and Private Registered Providers we are unable to suggest additional measures. Government should consider promoting equity share as its preferred model for shared ownership. Until 100% of the property is purchased, shared ownership tenants currently own nothing in legal terms beyond the option to buy. This potentially needs to be addressed if the option is to be more attractive to potential purchasers.