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<b>REPORT TO:</b>	<b>HOUSING AND COMMUNITY SERVICES</b>	<b>AGENDA ITEM: 8</b>
<b>DATE OF MEETING:</b>	<b>4<sup>th</sup> OCTOBER 2018</b>	<b>CATEGORY: RECOMMENDED</b>
<b>REPORT FROM:</b>	<b>STRATEGIC DIRECTOR (SERVICE DELIVERY)</b>	<b>OPEN</b>
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<b>SUBJECT:</b>	<b>COUNCIL RESPONSE TO MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT CONSULTATION ON SOCIAL HOUSING GREEN PAPER</b>	<b>REF:</b>
<b>WARD(S) AFFECTED:</b>	<b>ALL</b>	<b>TERMS OF REFERENCE: HCS14</b>

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## **1.0 Recommendations**

1.1 The Committee is recommended to endorse the comments outlined in the report as the Council's response to the Ministry for Housing, Communities and Local Government (MHCLG) consultation on the Social Housing Green Paper.

## **2.0 Purpose of Report**

2.1 To provide the Committee with an overview of the proposals set out in the Social Housing Green Paper and set out the Council's proposed response.

## **3.0 Detail**

3.1 The Social Housing Green Paper, 'A New Deal for Tenants' proposes a rebalancing of the relationship between residents and landlords. The Government intends the Green Paper to kick-start a national conversation about the future of social housing and its role in a modern mixed tenure market. The Green Paper calls for a turning point in how the country thinks and talks about social housing, following the tragedy at Grenfell Tower.

3.2 The Green Paper has been informed and shaped by conversations with almost 1,000 residents of social housing and over 7,000 responses to an online survey.

<https://www.gov.uk/government/consultations/a-new-deal-for-social-housing>

3.3 There are five key principles that underpin the new, fairer deal for social housing residents:

1. A safe and decent home which is fundamental to a sense of security and ability to get on in life.
2. Improving and speeding up how complaints are resolved.

3. Empowering residents and ensuring their voices are heard so that landlords are held to account.
  4. Tackling stigma and celebrating thriving communities, challenging the stereotypes that exist about residents and their communities.
  5. Building the social homes that are needed and ensuring that those homes can act as a springboard to home ownership.
- 3.4 Alongside the Green Paper, the Government has announced a review of the social housing regulatory framework and consultation on the use of Right to Buy receipts. This is the subject of a separate report on this Committee Agenda
- 3.5 Additionally, Government has confirmed in the Green Paper that two previously announced policies (high value asset levy and mandatory fixed-term tenancies) will no longer be going ahead.
- 3.6 The Government will consider how it can re-balance the relationship between residents and landlords to ensure issues are resolved swiftly and residents' voices are heard. To support this vision there is a powerful case to be made for strengthening the regulatory framework so that it not only focuses on the governance and financial viability of housing associations, but also on how residents are treated and the level of services they should expect.
- 3.7 The Government is also publishing a [call for evidence](#) which seeks information on how the regulatory framework is operating. This is the first step to a full review of regulation to make sure it is fit for the future.
- 3.8 These measures will address the stigma that for too long has been associated with social housing and on which residents all around the country have voiced their concern and ensure social housing residents are recognised for their valuable contribution to society.

## **Consultation**

- 3.9 The social housing green paper proposes fundamental reform to ensure social homes provide an essential, safe, well-managed service for all those who need it. This green paper seeks views on Government's vision for social housing providing safe, secure homes that help people get on with their lives. This consultation closes at 11:45pm on 6 November 2018. Any responses should be made online at:

[https://www.surveymonkey.co.uk/r/A\\_new\\_deal\\_for\\_social\\_housing](https://www.surveymonkey.co.uk/r/A_new_deal_for_social_housing)

## **Summary of the five key principles**

- 3.10 The five key principles with the proposed changes put forward by the Government are summarised in 3.10.1 to 3.10.5 below.

## **Ensuring resident safety**

- 3.10.1 The Government proposes:

- implementing the recommendations from the Hackitt Review of building regulations and fire safety, legislating to fundamentally reform the current system
- establishing a pilot with a group of social landlords who would trial options to improve communication and engagement with residents on safety issues
- reviewing the decent homes standard. This might include adding new requirements around energy efficiency and fire safety to mirror those recently introduced in the private rented sector.

### **Effective resolution of complaints**

3.10.2 The Government proposes a number of options to improve the way that complaints about social landlords are handled, including:

- looking at ways to speed up landlords' internal complaints processes, for example by asking the regulator to set out some suggested timings in a code of practice
- exploring ways to improve the use of mediation in landlord/tenant disputes
- looking at ways to raise awareness among tenants of their rights and the options available to them to make a complaint about their landlord
- reforming or removing the requirement that complainants go through a 'designated person' (a Member of Parliament (MP), councillor or tenant panel) or wait eight weeks before they can contact the Ombudsman with a complaint.

### **Empowering residents and strengthening the regulator**

3.10.3 The Government proposes:

- requiring all landlords to provide data on a number of key performance indicators (KPIs) to the regulator for regular publication
- the regulator would then publish these in the form of league tables to enable comparison between landlords. Performance could then be taken into account when Government funding is being allocated to individual landlords, for example to support the development of new homes
- considering a number of potential changes to the system of regulation for social landlords. A separate call for evidence has also been published on this subject. Potential changes could include:
  - enabling the regulator to take a more proactive approach to enforcing the 'consumer standards' (covering tenant involvement and empowerment, homes, tenancies and neighbourhoods and communities)
  - giving the regulator more powers to scrutinise the performance of local authority (LA) landlords.
  - considering options to give tenants a voice on policy issues at a national level, including perhaps establishing a representative body
  - looking at a variety of options to promote more community ownership, or community leadership of social landlords.

### **Tackling stigma and celebrating thriving communities**

3.10.4 The Government proposes:

- providing support for community events and initiatives
- encouraging greater levels of professionalism and a 'customer service culture' within the social housing sector

- publishing further guidance on the National Planning Policy Framework (NPPF) to encourage new affordable homes to be designed well and integrated within developments.

## **Expanding supply and supporting home ownership**

### 3.10.5 The Government proposes:

- scrapping plans to require councils to sell their most valuable homes as they become vacant, in order to fund the extension of the right to buy to all housing association tenants
- giving councils new flexibilities to spend the money raised from right to buy sales on new homes. A separate consultation has been launched to look at this issue. This is the subject of a separate report on this Committee's Agenda
- scrapping plans to require councils to offer all new tenants a tenancy for a fixed term. LA's will still be able to use fixed term tenancies at their discretion
- ensuring that where an existing secure/assured tenant needs to move as a result of domestic abuse, they are always able to retain their lifetime tenancy
- entering into deals with some housing associations to provide certainty over Government funding over a longer period than is currently possible. This is intended to address the 'stop-start' nature of Government's current approach to allocating funding for five years at a time
- looking at ways to support the development of more community-led house building
- gathering further evidence on how the current approach to social housing allocations is working in practice in different parts of the country
- looking at ways to make it easier for new shared owners to increase their stake in their home in the future. This might include, for example, allowing them to buy much smaller increments than are usually possible.

## **Key themes from the Council's response**

### 3.11 The detailed Council response proposed is set out in Appendix 1; a summary of the key themes of this response is shown below, the Council:

- endorses the proposal to fast track a social sector response on ensuring resident safety ahead of legislation building on existing good practice in the sector
- supports a complaints process that is accessible for tenants, transparent to the parties involved and is completed in a timely/efficient manner.
- recognises the need for some form of Key Performance Indicators (KPI's) regime to be publicly available through individual LAs and by the Regulator. This needs to be meaningful to residents, drive improvement across the sector and incentivise the right behaviour by landlords
- recognises that stigma is an important theme raised by residents post Grenfell, and is therefore crucial that the Council shares and promotes positive stories of its social housing residents. This should also be reflected in the content and tone of messaging in national policies and in the conversations across the whole sector
- supports the removal of the Higher Value Assets Levy, which removes an area of uncertainty impacting on investment in the council housing stock.

## **4.0 Financial Implications**

### 4.1 There are no specific financial implications for the Council relating to the consultation, financial implications for the proposals are set out in the detail of the report.

## **5.0 Corporate Implications**

5.1 There are five main strategic aims contained within the Council's Corporate Plan that provide a background to this consultation.

- People, PE1, to enable people to live independently
- People, PE2 is to protect and help support the most vulnerable including those affected by financial challenges
- Place, PL1 to facilitate and deliver a range of integrated and sustainable housing and community infrastructure.
- Place, PL4 connect with our communities, helping them feel safe and secure
- Outcomes, O5, maintain customer focus

5.2 There are no legal implications associated with responding to this consultation.

## **6.0 Community Implications**

6.1 None

## **7.0 Background Papers**

7.1 Appendix 1 - South Derbyshire District Council's Response to the Green Paper

## Appendix 1 – South Derbyshire District Council’s Response to the Green Paper

### Consultation questions

Chapter	Question	Response	Key points
Ensuring homes are safe and decent	<p>Dame Judith’s report states that residents have an important role to play in identifying and reporting issues that may impact on the safety of the building and in meeting their obligations, including co-operating with crucial safety related works</p> <p><b><i>Q1. How can tenants best be supported in this important role of working with landlords to ensure homes are safe?</i></b></p>	Yes	<p>The Council welcomes the proposal to fast track a social sector response ahead of legislation building on existing good practice in the sector and supporting residents to engage with their landlords.</p>
	<p>Government would like to explore whether the Decent Homes Standard continues to cover the right issues.</p> <p><b><i>Q2. Should new safety measures in the private rented sector (PRS) also apply to social housing?</i></b></p>	Yes	<p>Yes, although there is likely to be a substantial cost in ensuring that all social rented homes are fitted with smoke alarms on each floor, carbon monoxide alarms and five-year inspection/testing of electrical installations. The Council would wish to support minimum standards for energy efficiency (as with the Private Rented Sector). These costs need to be reflected in Government grant or an increase in Housing Revenue Account (HRA) debt caps.</p> <p>Social housing should aspire to a higher standard (than a regulatory standard). Registered Providers (RP’s) can be subject to regulatory challenge by Environmental Health Practitioners under the Housing Act 2004 Part 1. This should be extended to local authority (LA) housing (currently LA’s are exempt from enforcement action (as essentially a LA cannot take action on itself).</p> <p>The Decent Homes Standard requires an overhaul. It should</p>

			feature special consideration for crowding and space (above and beyond housing health and safety rating system (HHSRS))
	<b>Q3. Are there any changes to what constitutes a Decent Home that we should consider?</b>	Yes	Yes, particularly relating to energy efficiency.
	<b>Q4. Are additional measures required to make sure social homes are safe and decent?</b>	Yes	Yes, this should include explicit requirements in relation to fire safety both in dwellings and in relation to communal areas.
Effective resolution of complaints	<b>Q5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?</b>	Yes	Yes, there is a need to ensure that landlords have effective mediation arrangements locally and that residents are involved in or in shaping these arrangements.
	The “democratic filter” is an additional hurdle before accessing the Housing Ombudsman that does not apply to people with complaints in most other sectors. We are considering how best to improve access to the Housing Ombudsman for social housing residents.  <b>Q6. Should we reduce the eight week waiting period to four weeks, or should we remove the requirement for the “democratic filter” stage altogether?</b>	Yes	The Localism Act (2011) introduced a “democratic filter” to housing complaints for the Council. This will mean that before tenants can go to the Housing Ombudsman, they must first go through a “designated person” which could be a Member of Parliament (MP), local councillor or a tenant panel.  Reducing the waiting period or removing the filter could remove a delay, which stops tenants from getting their complaint resolved swiftly.
	Reforming the filter stage would require primary legislation. We therefore also want to explore what more could be done in the meantime to help ensure that “designated persons” better understand their role and help to deliver swift local resolutions for residents.  <b>Q7. What can we do to ensure that the “designated persons” are better able to promote local resolutions?</b>	Yes	The Council has its local MP, Council Members and its Resident Scrutiny Panel undertaking the “designated persons” role on complaints.  Better communication of the roles, highlighting what local arrangements are though the Council’s website and local publication of the scheme would help to promote this role.  Further Training for Council Members and the Residents Scrutiny Panel as to how to manage these complaints efficiently and effectively would be beneficial in supporting them to deliver

			these local resolutions.
	<b>Q8. How can we ensure that residents understand how best to escalate a complaint and seek redress?</b>	Yes	Publication of the LA complaints procedure and ensuring the process is simple and easy to access and follow to resolution for the resident.
	<b>Q9. How can we ensure that residents can access the right advice and support when making a complaint?</b>	Yes	Publication of the LA complaints procedure and ensuring the process is simple and easy to access and follow to resolution for the resident.
	We want to consider how to speed up landlord complaints processes. One option might be for the Regulator to set out more specific timescales in a Code of Practice.  <b>Q10. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?</b>	Yes	There is an argument that further action is needed to reduce waiting times. There also needs to be an appropriate limit applied to the amount of time that can lapse between an incident occurring and when a customer raises a complaint. This helps protect against vexatious complaints and ensures that providers are able to access all of the information required to conduct a thorough investigation. The threshold of six months currently used in the social sector seems appropriate.  The Council has a clear accessible process for its residents to make a complaint through its corporate complaints procedure.
	<b>Q11. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?</b>	Yes	Timely and effective resolution is of paramount importance to customers, fire safety concerns may need a more urgent response.
Empowering residents and strengthening the regulator	We think that any Key Performance Indicators (KPIs) should be focused on issues of key importance to residents, covering those identified through our engagement, such as: <ul style="list-style-type: none"> <li>• keeping properties in good repair;</li> <li>• maintaining the safety of buildings;</li> <li>• effective handling of complaints;</li> <li>• respectful and helpful engagement with residents; and,</li> </ul>	Yes	If the sector is going to use KPIs, it would be better to have something which is developed and owned by the sector, rather than the Regulator. The development of a social sector scorecard covering those key things which matter to residents is essential.  KPIs need to be meaningful to residents, drive improvement across the sector and incentivise the right behaviours by landlords. KPIs should be reported regularly and landlords should

<ul style="list-style-type: none"> <li>• responsible neighbourhood management, including tackling anti-social behaviour.</li> </ul> <p>We think that the best way for these KPIs to be made available publicly is for the information on performance to be provided to the Regulator every year for publication.</p> <p><b>Q12. Do the proposed key performance indicators cover the right areas? Are there any other areas that should be covered?</b></p>			<p>use these indicators to drive improvement across services.</p> <p>Residents need to have the tools to identify and challenge their landlord on poor performance in services that matter to them. This will help to identify the issues that are important to tenants that are suitable to be monitored through league tables (i.e. are relevant to different types and sizes of landlords in different locations).</p> <p>Engagement /consultation also need to be in a format that tenants/residents prefer, for example, formal meetings for many are not an appropriate environment.</p>
<p><b>Q13. Should landlords report performance against these key performance indicators every year?</b></p>		Yes	As a minimum through the Housing Annual Report, but quarterly reports on specific indicators should be published for tenants.
<p><b>Q14. Should landlords report performance against these key performance indicators to the Regulator?</b></p>		Yes	Yes, annually.
<p><b>Q15. What more can be done to encourage landlords to be more transparent with their residents?</b></p>		Yes	Identify best practice and share this through the Regulator and other forums.
<p>The Regulator already expects landlords to publish information about complaints each year, but approaches vary. We are considering setting out a consistent approach on how landlords should report their complaint handling outcomes, by asking them to report how many complaints were resolved, how many were resolved after repeated complaints and how many were referred to the Housing Ombudsman.</p> <p><b>Q16. Do you think that there should be a better way of reporting the outcomes of landlords' complaint</b></p>		Yes	The Council would welcome a standardised approach to publication of complaint performance data. It publishes all Council complaints information on a quarterly basis through Committee Meetings and provides this information on the Council's website and in other formats if needed. Open access is available to all residents to digest, review and comment on this information if they choose to do so. This approach also needs to outline how the landlord responds to customer complaints and shapes service improvement.

	<p><b>handling? How can this be made as clear and accessible as possible for residents?</b></p>		
	<p>We think the Regulator is best placed to publish landlord performance in the form of league tables. However other approaches should be considered, including that used in Scotland. We would also welcome views on whether it would be helpful if landlord performance on key performance indicators is also reflected in a “consumer” ratings system, in addition to the governance and viability ratings, which the Regulator currently publishes for larger housing associations.</p> <p><b>Q17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?</b></p> <p><b>Q18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?</b></p>	<p>Yes</p>	<p>The Council would support the Regulator to play a key role in collating KPIs with landlords and residents.</p> <p>Open access is needed on KPIs so that they are available for all residents to understand, review and comment on this information if they choose to do so. A stronger focus on resident scrutiny should also be encouraged.</p>
	<p>Government’s £9 billion Affordable Homes Programme supports landlords’ delivery of affordable homes. We want to explore whether the key performance indicators should help inform or influence the extent to which landlords receive funding and are minded to link Affordable Homes Programme funding to the Regulator’s governance rating as well as the viability rating.</p> <p>We will also consider how the key performance indicators could be used to help develop the requirements for any future strategic partnerships with social housing landlords.</p> <p><b>Q19. Should we introduce a new criterion to the</b></p>	<p>Yes</p>	<p>There needs to be tighter regulation of registered providers (particularly those who are ‘for profit’ and not utilising grant funding as there are currently no penalties or payback for disposal of affordable units if no grant has been drawn).</p> <p>Linking performance to access to grant is not a good idea as this could ultimately cause complex challenges and costly disputes. In theory it would seem appropriate to link grant funding to a landlords governance and viability ratings but unsure how this would work in practice</p>

	<p><b><i>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?</i></b></p>		
	<p>We want to understand more about whether the regulatory framework is setting the right expectations on how landlords should engage with residents, and how effective current resident scrutiny measures are.</p> <p><b><i>Q20. 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?</i></b></p>	Yes	<p>The Council has revamped its resident engagement/scrutiny approach to provide a more responsive service where tenants can get involved as and when they want to and tackling topics they are passionate about.</p> <p>As part of the social housing sector, the Council can always do more and there are challenges in engaging with residents and actively involving them in shaping services for the future.</p>
	<p>A number of national tenant and resident organisations in the sector have been exploring the option of an independent platform for tenants, based on widespread engagement, to enable them to have their voices heard more effectively at a national level. To be successful it would be important that it represents the voices of a wide diversity of tenants across the country and can win their confidence as an independent resident champion.</p> <p><b><i>Q21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?</i></b></p>	Yes	<p>The Council as landlord has tenant representation on the Association of Retained Council Housing (ARCH) Tenants Board and that provides a platform for views to be shared and topics discussed at a national level.</p> <p>Setting up a national 'Tenants Voice' would bring tenants together from across LA housing association and arms-length management organisations (ALMO) sectors and empower tenants to come together to have a stronger platform to influence change nationally.</p>
	<p>We are considering a new stock transfer programme to promote the transfer of local authority housing particularly to community-based housing associations.</p> <p><b><i>Q22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations?</i></b></p>	Yes	<p>This is something the Council would not support locally. There are lots of examples where this has not worked nationally and there are potential risks relating to transferred assets and the need for tighter regulation associated with managing social housing (fire safety / financial viability / public health risks).</p>

	<b><i>What would it need to make it work?</i></b>		
	<p>We are exploring options to demonstrate how community leadership can be embedded in the governance and culture of mainstream landlords, for example through a series of trailblazers to test new models and principles of structure and governance that allow for stronger community leadership.</p> <p><b><i>Q23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?</i></b></p>		No comment
	<p><b><i>Q24. 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?</i></b></p>		No comment
	<p><b><i>Q25. Are there any other innovative ways of giving social housing residents' greater choice and control over the services they receive from landlords?</i></b></p>		No comment
	<p>Local Management Agreements have been used by residents to enter into an agreement with their landlord to take control of small-scale services on a voluntary basis. Residents could choose to provide a service themselves as a group, employ someone to do it or engage a contractor or supplier.</p> <p><b><i>Q26. 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?</i></b></p>	Yes	No, this would leave the Council open to unacceptable risks and would take more time to oversee / regulate than actually delivering the service.
	<p>We also want to understand better whether satisfaction with contractor services could be increased by</p>	Yes	This would be a complicated system to manage in order to ensure a consistent approach to repairs and improvements.

	<p>encouraging landlords to provide greater choice to residents around services such as repairs and improvements, for example by routinely providing a list of approved contractors for individual tenants to choose from.</p> <p><b><i>Q27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?</i></b></p>		<p>Landlords should consult with their residents about the need in their local area. The landlord should provide more information about what residents should expect from the repairs service and work with them as to the appropriate level of involvement. This could range from involving tenants in the selection of contractors to discussions about the types of fixtures and fittings used in properties.</p>
	<p><b><i>Q28. What more could we do to help leaseholders of a social housing landlord?</i></b></p>	<p>Yes</p>	<p>The Council actively engages with its 38 leaseholders and has recently completed a consultation on a new Handbook setting out how it will continue to support and engage with them as a collective.</p> <p>Clearer methods of communication setting out what the landlord/leaseholder responsibilities are and consultation on work impacting in their communities is essential to supporting and engaging leaseholders.</p>
	<p>Parliament has set the Regulator of Social Housing a consumer regulation objective, which is:</p> <ul style="list-style-type: none"> <li>• to support the provision of social housing that is well-managed and of appropriate quality;</li> <li>• to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection;</li> <li>• to ensure that tenants of social housing have the opportunity to be involved in its management and to hold their landlords to account; and,</li> <li>• to encourage registered providers of social housing to contribute to the environmental, social and economic well-being of the areas in which the housing is situated.</li> </ul>	<p>Yes</p>	<p>The objectives and standards themselves are acceptable. The issue is more about how standards are monitored, publicised and enforced.</p>

	<p><b>Q29. 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?</b></p>		
	<p>We also want to know whether landlords would benefit from further guidance on what good looks like, without being overly prescriptive. The Regulator currently issues two Codes of Practice which further develop the requirements of the economic standards and we want to consider if a Code of Practice for consumer standards would be helpful to residents and landlords, to further develop the requirements of the consumer standards.</p> <p><b>Q30. 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?</b></p>	Yes	<p>The Council would welcome guidance on consumer standards. The guidance should be clear about the need to retain a focus on outcomes and avoid over-prescription as there may be local circumstances which need to be addressed. There is role that national bodies such as the Chartered Institute of Housing (CIH) and Association of Retained Council Housing (ARCH) could play, being involved in helping the Government to shape the guidance and these standards.</p>
	<p><b>Q31. 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?</b></p>		No comment
	<p>Our current thinking is that the Regulator should monitor the key performance indicators to identify where there may be issues of concern with performance. The Regulator would then be able to make a risk-based assessment of how and where to intervene,</p> <p><b>Q32. Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators and</b></p>	Yes	<p>The Council would support the Regulator to take a more proactive approach to consumer regulation and use KPIs to shape decisions on intervention on poor performing landlords.</p> <p>The regulator needs to be clear on how it would use KPIs to determine this with a focus on outcomes for residents.</p>

	<b><i>phased interventions as a means to identify and tackle poor performance against these consumer standards? How should this be targeted?</i></b>		
	<b><i>Q33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?</i></b>	Yes	The Council would support similar regulation of LA's to be the same as that of housing associations as far as that is possible.
	<b><i>Q34. Are the existing enforcement measures set out in Box 3 adequate? If not, what additional enforcement powers should be considered?</i></b>	Yes	As per the response to Q33, we support the principle of parity across the board.
	<p>Around 200 Tenant Management Organisations and Arms Length Management Organisations are in operation to manage homes on behalf of a local authority, which remains the landlord. The Regulator will hold the local authority landlord to account for the way the services are delivered, so it is vital that the local authority has good oversight arrangements in place to ensure that management organisations provide a good service. There is a further question about whether more is needed to set out the accountability of the landlord for management services that are outsourced, or whether the Regulator should have direct oversight of how these management organisations operate.</p> <p><b><i>Q35. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?</i></b></p>		No comment
	The Regulator is currently part of the Homes and Communities Agency, but upcoming legislative changes		No comment

	<p>will shortly establish it as a standalone Non-Departmental Public Body. As such it will be accountable to Parliament in the same way as other Non-Departmental Bodies.</p> <p><b>Q36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?</b></p>		
Tackling stigma and celebrating thriving communities	<p>We want to celebrate the role of residents in shaping fantastic places by recognising the best neighbourhoods. Awards could include investment to support successful initiatives to grow, or funding for an event or a street party to bring people together across housing tenures and generate a sense of pride.</p> <p><b>Q37. How could we support or deliver a best neighbourhood competition?</b></p>	Yes	<p>The Council has worked with residents and their families through its community engagement schemes to bring a sense of pride to the diverse communities across the District. This has included community tidy-ups/litter picks, garden competitions and the refurbishment of community facilities.</p> <p>Any competition needs to be driven by the views and life experiences of the residents in those neighbourhoods.</p>
	<p><b>Q38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?</b></p>	Yes	<p>It is very difficult to design specific policy initiatives which will tackle stigma. This is more about how the public sector talks about and treats social housing in all that it does.</p> <p>Social housing needs to be treated as of equal worth to home ownership. This should be reflected in the content and tone of Government's messaging and policies and in the conversations across the sector.</p>
	<p>We want to embed a customer service culture and attract, retain and develop the right people with the right behaviours for the challenging and rewarding range of roles offered by the sector. Some sectors have found that professional qualifications or industry codes of practice support this. We want to encourage professionalisation, building on the work already delivered by organisations such as the Chartered Institute</p>	Yes	<p>The Council supports the need for professionalism across the sector with the support of a membership body such as the CIH/ARCH to raise standards across the sector.</p> <p>Professionalism should be a customer-focused self-development within an organisational culture. Some housing roles having a very clearly defined body of technical knowledge which applies</p>

	<p>of Housing.</p> <p><b>Q39. What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?</b></p>		<p>(homelessness, lettings, housing management, development, asset management) and given the issues many of the Council tenants face, it is incredibly important that the staff working with them have the appropriate knowledge and skills.</p>
	<p>Landlords have an obligation to meet the Neighbourhood and Community Standard. This includes cooperating with partners to promote social, environmental and economic wellbeing to prevent and tackle anti-social behaviour in neighbourhoods where they own homes.</p> <p>It is clear that residents do not feel landlords are consistently meeting this standard. Therefore we are considering introducing a key performance indicator that will capture how well landlords undertake their neighbourhood management responsibilities.</p> <p><b>Q40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?</b></p>	<p>Yes</p>	<p>To simply have one indicator to define good neighbourhood management is difficult. Good neighbourhood management is about how the landlord maintains the property, the surrounding gardens/communal land and how it deals with anti-social behaviour (ASB) and crime with the local statutory agencies/partners. These activities should be included in a number of measures to tackle this.</p>
	<p>Some landlords are clearly going beyond meeting regulatory requirements. This can include providing employment support and signposting to vital services.</p> <p><b>Q41. 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?</b></p>		<p>No comment</p>
	<p><b>Q42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?</b></p>	<p>Yes</p>	<p>See response to Question 40.</p>

	<b><i>Q43. What other ways can planning guidance support good design in the social sector?</i></b>	Yes	Setting out requirements relating to design and affordable housing in Supplementary Planning Document (SPD) guidance and having a requirement for secure by design in certain areas.
	<b><i>Q44. How can we encourage social housing residents to be involved in the planning and design of new developments?</i></b>	Yes	Council tenants have been involved in the development of new social housing schemes in South Derbyshire working with its Registered Provider partners to shape the specification and design. This approach should be looked at with new developments.
Expanding supply and supporting home ownership	<b><i>Q45. 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</i></b>	Yes	LA's should be able to utilise 100% of capital receipts gained from RTB following the re-distribution of historic debt costs.  The Council is not in a position to require any more head-room but if grant funding is on offer, this could be of interest although specific conditions would need to be considered.
	The level of new housing delivery from the community-led housing sector in England is much lower than in comparable countries in Europe and North America, where several per cent of overall new homes is not unusual.  <b><i>Q46. How can we boost community-led housing and overcome the barriers communities experience to developing new community owned homes?</i></b>	Yes	This needs fundamental review before being considered for rollout in its current format.
	<b><i>Q47. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?</i></b>		No comment
	We know that some people can struggle to buy more equity in their homes. We have heard from both providers and shared owners and identified three main	Yes	It is not a good idea to reduce stair-casing requirements as the market and house values are not static. Providers could build in an element of the rental payment to pay off the capital value but

	<p>barriers:</p> <ul style="list-style-type: none"><li>a) The minimum 10 per cent staircasing requirement</li><li>b) The increasing value of the home</li><li>c) The additional fees</li></ul> <p><b><i>Q48. How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?</i></b></p>		<p>this would increase overall costs.</p>
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