

6th November 2018

Social Housing Team
Ministry of Housing, Communities & Local Government

Greater Manchester Housing Providers ([GMHP](#)) is a partnership of social landlords working across Greater Manchester. We own or manage 1 in 5 homes in Greater Manchester. Working with colleagues in the Greater Manchester Combined Authority (GMCA) and Greater Manchester Health & Social Care Partnership (GM H&SCP), we are committed to improving the lives of our residents through the delivery of excellent services, as well as a wide range of additional services to support people in employment, training, improving health, and developing new homes across the region. We are integral to our communities, and proactively listen and engage with our residents. Our work extends far beyond our landlord functions, and we support employment, training, volunteering, health & wellbeing work.

We have worked across the partnership to develop a combined response with each other and with the GMCA. This is intended to capture our shared views on the Green Paper and to complement more specific responses from individual landlords.

We have a unique relationship in Greater Manchester in our partnership with the GMCA and the GM H&SCP, and local authorities. We are all working together on the radical reform of public services through a series of challenging and ambitious programmes of delivery based on person, place and prevention.

We welcome the opportunity to strengthen our links with our residents, and to work with the Regulator and government to provide more transparency on complaints, performance and safety. This Green Paper is a welcome step that reinforces customers at the centre of what we do, and gives us the opportunity to do more. Its general thrust of wanting to raise consumer standards is very welcome and its focus on improving standards and services, not just expanding development is a welcome change of emphasis from government.

- While we welcome recognition that a service as important as social housing should have nationally recognised standards we have concerns that centrally mandated approaches to new indicators for performance may not provide the positive outcomes that government is seeking for residents. Increased quality of services come from a locally relevant approach developed in partnership with residents.
- GMHP members are central to our communities, and support our communities far beyond the traditional landlord role. We want to go further and are developing new approaches to support the work with our residents and communities.

- In GM we are working with the GMCA and GM H&SCP to develop an offer around place, where this means not just the physical environment and property condition, but includes a greater sense of community. By focussing on a place-based approach we believe that there is an opportunity to improve people's outcomes and lives. Feedback from our customers supports this wider approach, both in the context of place and in relation to challenging perceptions and tackling stigma.

We welcome the opportunity to work with government as the Green Paper ideas are developed and will continue to involve our members and residents in the dialogue which follows.



Jon Lord

Chief Executive Officer Bolton at Home
Chair, Greater Manchester Housing Providers

Chapter 1 - Ensuring homes are safe and decent:

Following the Grenfell tragedy the GM High Rise Taskforce was established with the GMCA and GM Fire & Rescue Service to co-ordinate the response across Greater Manchester. The taskforce has been pivotal in responding to the concerns raised in the aftermath of Grenfell, and providing a co-ordinated response to the issues raised by residents, and as part of the Hackitt Review. GMHP has created a Fire Safety Technical Group to explore shared concerns, to exchange best practice and to jointly procure fire safety consultants & contractors.

GMHP welcome the focus on ensuring homes are safe and decent. Residents should expect transparency and be able to access information from their landlord on the safety of their buildings, be able to raise any concerns, and have them taken seriously. Any information provided must be presented in a way which is accessible and meaningful for residents.

We agree the social rented sector should comply with the same safety standards as the private rented sector, creating parity across the sectors. Social landlords already carry out a wide number of safety checks and planned maintenance to their properties. GMHP would welcome discussion with Regulator on how it will assess landlords' fire safety policies and procedures.

Decent Homes

- Any review of the Decent Homes standard must take into account a number of key factors:
 - Work being undertaken as part of the Hackitt review.
 - The absolute need for consistency of approach between fire authorities and landlords.
 - The need for improvement in energy efficiency to properties, to help reduce fuel poverty, and meet the changing needs of climate change.
 - Work undertaken by landlords as part of their routine planned maintenance.

- All residents should have access to properties that exceed the Decent Homes Standard and the possibility of a funding environment that offers the option of a more stringent standard for social housing is welcomed.

- Any move to ensure that all homes provided in the sector are safe and decent is welcomed. Landlords monitor compliance with the Decent Homes Standard as well as monitoring performance on day-to-day repairs and maintenance.

- The measures should form part of a trigger for more active engagement from the Regulator where potential compliance issues are identified.

- Many landlords already go beyond the basic levels contained within the current Decent Homes Standard, and these are provided through a planned programme of investment works that is in place to maintain the decency and sustainability of stock.
- GMHP members already involve our residents in decisions about their homes. We are exploring ways of strengthening our residents' voice in our work, whilst avoiding cumbersome and bureaucratic structures and processes.

Consideration should also be given to the need for a Decent Homes standard in the private rented sector, and what support can be given to owner-occupiers to maintain and improve their properties.

The private rented sector is largely unregulated, and existing legislative measures are inadequate to tackle an increasing number of properties that are unfit. The direct cost to local authorities, and the indirect costs to the health economy, employers, and government of poor quality private sector housing place a considerable strain on the economy. This is a very significant gap in addressing issues in the housing market, and GMHP welcomes the measures proposed in the Fitness for Human Habitation Bill.

We would welcome the opportunity to work with government to develop a pilot to engage and work with residents on safety issues.

Chapter two - Effective resolution of complaints

GMHP is clear that it is the responsibility of landlords to operate a well-publicised and accessible complaints process. Any complaints process should be created and reviewed in consultation with residents and there should be accountability to residents built into the process.

The provision of an open and transparent complaints process should form part of the Regulatory framework. However, this should not be through the form of a prescriptive, one-size-fits-all approach, but through setting standards and principles.

- During consultation on the Green Paper our residents have told us the existing framework can be time-consuming and bureaucratic for them.
- The democratic filter and eight week waiting time does not serve either the landlord or resident well, and is an artificial barrier that can create frustration for the resident who simply wants their complaint resolved quickly and fairly.
- We believe that the 'designated persons' process does not add value to the current complaint review process for landlords or customers. In many instances elected

representatives will be involved in cases at a much earlier stage because they have been contacted by their constituent for advice or support.

- Encouraging independent input and oversight within complaint processes, for example from customer representatives or independent tenants, offers a more effective opportunity to resolve complaints in a timely manner. Many GMHP members already do this.
- A number of GM housing providers are trialling different complaint resolution processes, and we would welcome the opportunity to share the results with government.
- There is an opportunity to make greater use of new technology to streamline processes and mediation, and for landlords to develop a wider pool of trained mediators and advocates to work with residents and landlords to resolve complaints.

The total number of complaints should not be taken as a measure of poor landlord service. Indeed, an effective and accessible complaints procedure could actually generate more complaints because residents consider that their concerns will be taken seriously.

Health & safety concerns

- Landlords want to hear feedback from customers about building safety concerns. Issues that relate to building and safety concerns with existing installations should be dealt with through a landlord's complaint procedures, and resident engagement structures.
- A lower threshold for consumer standards would provide a more proactive route to redress, but residents need other options to raise issues where the landlord is not addressing their concerns. Government should investigate the possibility of a reporting system that can trigger Regulatory investigations as part of the Regulatory Framework.
- Consultation with residents on the Green Paper proposals has shown that whilst there is awareness of the existing sources of support available to them, in some cases they would also welcome a more proactive approach by landlords to ensure they are aware of the complaints process, and that it is easy for them to give feedback. The GMHP Tenant's Voices work will develop this theme over the next six months across member organisations.
- We believe that strengthening local arrangements will have a greater positive result than a centrally mandated model that does not take into account local needs and

circumstances. A one-size fits all approach will not allow for variations in size and type of housing provider; nor residents' priorities.

Chapter three - Empowering residents and strengthening the Regulator

The principle of introducing a customer or service delivery element into the Regulatory Framework is supported. At present the Regulator focuses on financial and governance risks in the sector and there is no active regulatory engagement of consumer standards. Changing the emphasis of the regulatory framework to give equal weight to the experience of residents will provide a more complete picture of landlord performance and act as a useful way of ensuring standards are met.

We welcome the move to strengthen the consumer standards and we believe this will raise standards. Any changes to strengthening the role of the Regulator must consider the following:

- Single model top-down targets are not as effective as establishing a culture of customer service excellence.
- Any new Regulatory Framework or standards must drive a culture of continuous learning and improvement.
- Proposed changes and indicators must be developed in consultation with landlords and residents.

- The proposed indicators act as a useful starting point to drive transparency across the sector, but should also include:
 - Keeping homes safe & secure
 - Making best use of existing homes
 - Supporting local authorities to tackle homelessness

- The Regulator should also consider how any new data set links with pre-existing measures, such as those that form part of the new Value for Money standard. Any data that is collected needs to be proportionate and useful to landlords, residents and the Regulator, and any grading should be absolute, and not relative.

- If league tables are to be used, they need to be developed with our residents to ensure the intended outcomes for service excellence. They should also focus on improving failing landlords at the lowest end and not unduly interfering on those in the top quartile. We would welcome the opportunity to develop a pilot with government.

- GMHP believe that any link between minimum standards and grant allocation must reflect local circumstances and not be centrally mandated by the Regulator, based on an inflexible formula. Any changes to grant allocation must not adversely affect landlords who work in more challenging areas or regions, or be based solely on a league table position, but on a range of indicators. Government and the Regulator have the opportunity to develop a smart outcome-based approach that will support improvement and excellence in service delivery as well as maximising delivery of new homes.
- The proposal to clarify expectations in the Regulatory standards on resident engagement on governance and scrutiny is welcomed.
- We would welcome further encouragement of scrutiny panels and the sharing of learning between panels but this should not be over prescriptive so that each landlord can design scrutiny in ways that suit their customer base.
- Providing clear standards and expectations for all landlords will help to improve resident engagement in the sector and give residents of all landlords the opportunity to get involved and have a voice.
- We would welcome the opportunity of working with government to trial any new approaches to resident scrutiny. Landlords must have the opportunity to submit views on any new scheme that is introduced, and to work with residents to shape any new approach, and must not duplicate existing structures.
- All registered landlords should be subject to the same Regulatory regime. This would set out clear and consistent expectations for the sector. At present there is a gap in the Regulatory Framework for Social Housing for local authority, TMO and ALMO landlords .
- The consumer standard needs to be specific that landlords should ensure that all residents and customers (including vulnerable groups and those from a BME background) fully understand how the system works and how to access it to ensure they are not disadvantaged when trying to complain and get issues resolved.

Chapter four - Tackling stigma and celebrating thriving communities

Celebrating our communities & community impact

GMHP landlords are already central to the communities they work in. We promote and celebrate the achievements of our residents, and support many initiatives and programmes.

These include resident award ceremonies, community stars, supporting local groups and community action, as well as supporting our residents into employment, training and self-support and improving health and wellbeing.

The GMHP [Ambition to Deliver](#) clearly lays out the foundations for our ambitions for delivering more on new homes, health and social care, work and skills, the economy and homelessness. Backed by all GMHP members, it sets out our offer for transforming not only homes, but the life chances of our communities.

Our current work across GM includes and is firmly based in supporting and developing our communities. Examples include:

- Funding for initiatives including community cohesion, supporting hard to reach groups, encouraging participation and community building.
- Residents' voice forums where residents give feedback and help shape future services.
- Recognition of residents who work for the benefit of their community.
- Dedicated community teams who work in the neighbourhoods to fund and support a wide range of community initiatives to support residents.
- Funding and delivering employment, training and volunteering programmes for residents, as well as promoting activities to reduce social isolation, and improve health and work outcomes.
- Managing or supporting the provision of community venues.
- The GMHP Social Value Group has been working over the last year to develop and support a greater social value return for our residents, and recently completed an audit of the [social value gains](#) of over half of our members or 2017/18. This will be reported annually and is being further developed to establish where social value can be increased.

Removing stigma

Government can support reducing stigma directly in a number of ways.

- Social housing should be promoted as a tenure of choice, within a thriving community. Feedback from residents during consultation on this Paper has shown that our residents are proud of where they live, and want social housing to be seen as an attractive and affordable option for people. The idea that it is just a stepping stone into owner occupation is contrary to the aim of reducing stigma and this notion therefore needs removing from the Green Paper.
- GMHP is working hard with partners across GM to improve the places and communities where our residents live. Any approach or campaign that celebrates the positive stories of social housing residents is welcomed.
- Many social housing landlords already work hard to change perceptions of social housing residents through media campaigns, resident dialogue and wider campaigns that are run by trade bodies such as the National Federation of ALMO's and the National Housing Federation. However, it is recognised that more can be done at a local and national level to reduce stigma and promote the positive input that social housing residents have on society. One way of doing this is to encourage all social housing landlords to engage further with their communities.

We would welcome the opportunity to work with government to discuss our work with our residents and communities and share best practice.

Sector professionalism

A large number of landlords already deliver high quality, professional services to our residents, and we believe that instances where this is not the case are the minority. Many employers already provide accredited training and development, whether through NVQ, the Chartered Institute of Housing, Investors in People accreditations, and specialist training. Many also run apprenticeship schemes, and use funding from the Apprenticeship Levy to fund additional work related training and development for staff.

- Initiatives to improve standards of service delivery across the sector are welcomed. Where landlords do not invest in the same way they should be encouraged to, with a focus on positive outcomes for their residents.
- Many landlords already use a set of performance metrics to measure service delivery. These are tailored to their communities, and it would be difficult to

replicate them nationally using a single set of indicators. If implemented new indicators should be developed in consultation with the Regulator.

- GMHP is confident but not complacent in assessing the quality of its services.

Anti-social behaviour

Many landlords already use all the powers at their disposal to tackle and manage anti-social behaviour.

- We have initiatives to prevent or reduce anti-social behaviour at an early stage through positive engagement officers, mediation, and tenancy visits.
- This is supported by clear anti-social behaviour protocols that set out the steps that can be taken to address anti-social behaviour.
- Selecting one measure of dealing with anti-social behaviour would not give the full picture of a service and some measures could lead to the stigmatisation of more challenging neighbourhoods. However if a measure is to be used it should be an outcome focused one.

GMHP members also work to tackle some of the root causes of ASB, through initiatives to improve access to medical and support services across their communities, in some cases funding specialist officers where other public services have retrenched.

The GM model of public service reform is also working to develop asset-based community approaches, using community resources to improve place and investing in people who have difficulties. By taking innovative approaches we can reduce instances of anti-social behaviour and improve people's life chances.

Chapter five - Expanding supply and supporting home ownership

The Paper recognises the need for more housing, and indeed sets out the number of homes needed nationally over the next period to the mid-2020's. In GM the need is equally pressing; the 2016 Greater Manchester Strategic Framework set a need of 227,000 homes over the next 20 years.

GMHP members have responded to the challenge in GM in a number of ways:

- Great Places was named as one of the Homes England Strategic Partnerships for the delivery of new affordable homes.

- The GMHP joint venture for development of market sale properties was recently announced.
- GMHP are working with the GMCA and the Mayor of Greater Manchester on ways of delivering more new homes.

This is in addition to landlords' own development programmes, some of which are to support people in with specific needs, and groups, such as the BME community who have differing housing needs.

Housing Associations also need more guaranteed long-term grant funding to provide longer-term financial sustainability.

One of the biggest challenges for increasing supply is the availability of land at reasonable prices, and blockages in the planning system. An increasingly thriving economy in parts of GM means there is growing competition for land that is ready for development. Brownfield sites need considerable remediation, and frequently pose viability challenges.

Government needs to recognise that while funding and headroom borrowing creates new supply it does not always create net additions to the social housing stock because of the loss of social housing through Right to Buy. In addition, the previous development of specialist schemes have been affected by uncertainty in government policy such as rent uncertainty and benefits changes. Resolving these issues with a clear funding regime will provide more certainty for landlords when they assesses the viability of development schemes. Right to Buy has been significant in diminishing the supply of social housing, with over 92,000 homes lost to the policy since its introduction in 1980.

The Paper does not recognise the benefits of good quality secure housing and the huge cost to the wider public purse of poor housing. As stated earlier it is well evidenced that poor housing places a strain on the people who live in them in terms of health services, schools, employment and can lead to poor health and shortened lives.

There needs to be greater recognition of the value in investing in the social housing sector as a way to deliver savings elsewhere in the system. It is not just a stepping stone into owner occupation, but of merit in its own right. Whether this is through reducing housing benefit/Universal Credit costs in the private rented sector (which we estimate to be around £5 million per week in Greater Manchester) or reducing pressures on the NHS. Social housing can play an important role delivering savings to the Exchequer. Greater emphasis is also needed on the different housing needs of society today and in the future. The housing stock in the UK does not always match the needs of the BME community, or those with specialist needs. More investment is needed to deliver new homes, and adapt existing properties.

In Greater Manchester we see the benefit of diversifying and developing innovative approaches to delivering new homes. Community-led housing can provide additional and affordable housing supply; mobilise popular support for new homes; help diversify the house building industry and provide more choice for older people.

Greater Manchester Housing Providers welcome this Green Paper. The most important responsibility we have as landlords is to ensure the homes we build and manage are safe. We will continue to do everything we can to ensure our residents have high quality, safe homes and neighbourhoods, as well as working with our residents to deliver improved services.

We are proud of the homes and services we offer our residents. We know there is more we can do, and are committed to working with our residents to have a positive impact on their lives.