

Response to the Social Housing Green Paper

Tpas 2018





Executive Summary

Tpas welcomes the opportunity to respond to the Social Housing Green Paper. We believe that the Green Paper, and the wider debate it has triggered about the role and purpose of social housing, is a once in a generation opportunity to develop a vision for Social Housing that is shared between tenants, landlords, government and the wider public. As England's leading tenant engagement experts, we have been particularly heartened by the way in which tenant voices, and tenant experience, has been foregrounded in many of the discussions.

In recent weeks we have seen, from government, a shift both in tone and policy in a number of areas. These changes are welcome, but it is vital that these are seen as just the start. We want to work with government, and others, to build on the new political commitment around social housing. Lasting and sustainable change is only possible if we place tenants at the centre of shaping the future, and that is something that we at Tpas are keen to support.

Our response is based on three key principles that were developed through our consultation with our members over recent months namely;-

1. The legitimacy of social housing as a tenure – it isn't second-class housing and tenants are not second-class people.
2. The need to place tenants at the centre of future discussions, and to ensure that there is support in place for them to be part of shaping the next stage of this debate.
3. A call to work with us, and others, to build on what we know works. There is already excellent, proven and innovative practice in the sector and we should all commit to build on this.

In the Green Paper government poses a number of important questions that we have responded to:

- In terms of **ensuring homes are safe and decent**, we ask that the findings of the Hackitt Review are implemented in full. We also set out our thoughts on how a combination of clear information on an agreed standard, local information on what individual landlords are doing and formal regulation and upward pressure from empowered tenants is the best way of ensuring safer homes.



- In terms of **effective resolution of complaints**, we call for a sector wide cultural shift to see complaints as key feedback that can help improve services. We also call for a ‘fixed, fair and fast’ complaints process, based on a consistent national standard alongside the removal of needless red tape that delays action. Routes to redress also need to be visible to tenants and all parts of the system need to be properly resourced to do the job.
- In terms of **empowering residents and strengthening the regulator** we believe providing well informed, confident and supported tenants, with the information that they need to challenge landlords will drive better performance. We believe the governance standard should be revised so that organisations have to demonstrate how all tenants are involved in shaping the services that they receive. We also support the principle of a national voice for tenants to place tenant views alongside government and providers in national policy debates, as well as supporting a more customer orientated, focused and muscular regulator with a clear remit to regulate a new consumer standard that has equal weight and prominence to existing regulatory standards on governance and viability.
- In terms of **tackling stigma and celebrating thriving communities** we welcome recent statements but believe there is still too much stigma associated with social housing and that must be addressed. In particular we call for greater leadership from national and local politicians to help drive a more balanced view of social housing tenants.
- Finally, in terms of **expanding supply and supporting home ownership** we recognise and support recent efforts to get local authorities building again, and acknowledge that government does appear to have started to grasp the scale of the supply challenge that we face. However, for future supply there does need to be a sustained and funded focus on developing homes for social rent rather than focusing predominantly on home ownership.

Throughout our response we make a number of practical suggestions, and offers to help support government as it moves onto the next phase of implementation. These offers are real. At Tpas we have considerable knowledge, experience and skills on how to work with landlords and tenants to co-create solutions that work. Our offer to government, is to work alongside you to make sure that the opportunity that the Green Paper provides is something that we do not waste. Tenants now expect more and the sector and government must ensure that expectation is matched with tangible change in how services are delivered, the culture of organisations and how tenants are kept safe in their homes.



Social Housing Green Paper – Tpas Submission

"I want to see social housing that is so good people are proud to call it their home... Our friends and neighbours who live in social housing are not second-rate citizens." Theresa May, September 2018.

Introduction

For many people 'Social Housing' has a different name. 'Home'. For over 4 million households in England and Wales, that is what we are talking about when we talk about social housing. The debate about who social housing is for, how we provide it and how we manage it needs to start with an understanding that we are talking about real people, living real lives in real places.

This is why the Social Housing Green Paper is both welcome and timely. It seeks, for the first time, to establish common cause between government, landlords, tenants and housing professionals. It provides a once in a generation opportunity to have a national conversation about the role, purpose and future of social housing and how we best help those who live in it. Everyone involved in social housing, from the Prime Minister to every tenant in the country, has a sense that we simply cannot afford to get this wrong.

Here at Tpas we are clear that the way to get it right is to make sure that tenants are at the centre of designing the systems and processes that exist for them. That is of course about working with tenants, but is also about working with government, and landlords, to help them develop new and effective ways of engaging with the people and communities that they exist to support.

This is what Tpas does. We are England's leading tenant engagement experts. We are a not-for-profit organisation and have been representing our members across England since 1988 with a membership made up of local tenants and landlord organisations, covering over 2.2 million homes across 200 landlords. We exist to improve tenant engagement standards across the country. We bring tenants, landlords and contractors together through a wide range of services, independent and impartial advice, support, consultancy, and training.

This response is based on extensive consultation with tenants and landlords across the country. It does three things:

- Sets out three key principles that we believe must be embedded in this work.
- Puts forward our responses to the five principles that government itself has identified.
- Makes some practical suggestions about what we would like to see moving forward.



This submission is our initial contribution to this debate. However, as an organisation created around an ethos to support effective engagement between landlords and tenants, and a strong track record in doing so, we hope that we can continue to bring our expertise and knowledge to bear as government seeks to move forward on the issues that the Green Paper has identified.

A Common Starting Point: Understanding the Problem

The Social Housing Green Paper is a welcome attempt to understand tenants of social landlords as people who are paying for a service rather than as recipients of welfare. The reason we are having this debate at all is immensely sad – that 72 people who lived in Grenfell Tower died in a fire that should never have happened. A perception around that tragedy, and one that was voiced so eloquently by tenants in the roadshows that Ministers led in the aftermath, was that social housing tenants are often seen as second-class citizens, voiceless in debates about housing. This is, in part, the problem which the Social Housing Green Paper is seeking to solve.

This marks a watershed moment in the national debate about social housing. For too long the debate has been characterized by ‘blame’. People blaming housing tenants for where they live, landlords for how they operate or government for the policies it has pursued.

Our response starts from a very simple premise – that all of us involved in housing now have a shared single aim – that social housing tenants live in safe and decent homes, are able to shape the services that they receive and know who to talk to if things go wrong. This can no longer be about what is right for government, for landlords or for tenants. It needs to be right for all three. We would like to see an explicit articulation of what this shared vision is, that becomes the touchstone for all of our work moving forward. We would be happy to work with Government and other bodies to help shape and test that common vision with our members and their tenants.



Key Principles

Our consultation with tenants and landlords has helped establish a set of three key principles for this work that have informed the detail within this response. These are:

- **Legitimacy** - Social housing is not a second-class tenure. The people who live there are not second-class people. A sense that social housing is not a legitimate tenure, has been pervasive in policy terms for some time. At Tpas we welcome the Prime Minister's recent explicit rejection of that view. We will continue to work with, and when necessary challenge, government, to ensure that this welcome commitment becomes the key test for any new policy proposals.
- **Tenant focus** - Fundamentally, what emerges as a result of the Social Housing Green Paper must command the confidence of tenants. Any sustainable solutions to the problems identified must be created collaboratively with people who deliver services and the people who live in social housing. This will require skills, commitment and resources at local and national level, to enable meaningful conversations with tenants.
- **Build on what works** - There is already excellent, proven and innovative practice in parts of the sector, and this must not be sacrificed in a search for consistency. No outcome of the Green Paper consultation should inadvertently lead to any landlord doing less than they currently do. Our previous work and our consultations identified examples of genuine innovation where landlords and tenants are working together. We can work with government to do further work in identifying these bright spots and helping others to learn from them.

We have kept these key principles in mind as we have developed our more detailed responses to the five areas that the Social Housing Green Paper set out around:

1. Ensuring homes are safe and decent
2. Effective resolution of complaints
3. Empowering residents and strengthening the regulator
4. Tackling stigma and celebrating thriving communities
5. Expanding supply and supporting home ownership



Principle 1 – Ensuring homes are safe and decent

Ensuring homes are safe and decent is something that must sit at the heart of planning for, providing and managing social housing. For tenants this is about confidence, knowing what to expect from landlords and being able to challenge their landlord if they have concerns about their own, their family's or their neighbours' safety. For landlords, it is about having an approach which has safety at its heart and for government and the regulator it is about having the ability to identify problems and to intervene where necessary.

We believe that, in order to ensure that homes are safe and decent, there must be three things:

- **Clarity about what to expect from any landlord** in terms of national standards on safety.
- **Clarity on what a tenant's individual landlord is providing**, and, critically, information on how safe their own home is.
- **Mechanisms for landlords to be held to account** on what they provide – both by tenants, and by the regulator.

In terms of **clarity on what to expect** from your landlord, we firmly believe that a national standard on safety is needed across the sector which is easy to understand, and which is actively enforced. This must make it clear to landlords and tenants what the minimum expectations they can expect are for all building types, (for instance setting out expectations around fire doors, sprinklers and safety checks).

Providing clarity is not just about giving information. It is about making sure that information is clear and useable and that it communicates to tenants in a way that allows them to know what should be provided. We believe that telling tenants what they should expect in terms of safety, from all landlords and from their own, is something that should routinely happen at the start of tenancies. This must also be accompanied with clear information on who to contact if there are concerns, as well as information on how to complain to the organisation and to an ombudsman service that is resourced to do the job. We also believe that it is worth investigating other mechanisms that would give groups of concerned residents a direct way of triggering regulatory attention. We recognise that this could be complex, but the principle of residents having the ability to trigger additional scrutiny is an important one that should be considered as we move forward. We would be interested in exploring this idea further with government, tenants, landlords and the regulator.



In terms of **clarity on what your landlord is providing** it is essential that all residents have access to fire and building safety information, which needs to be accessible and available electronically. This should include a personal evacuation plan. Third parties such as the fire service need to have access to it too. The information should be written in plain and easy to understand English and, where relevant, in other community languages. We believe that providing such information is a critical part of ensuring that people feel safe in their own homes.

We would propose that, as part of the information provided to residents on safety issues, there should also be clear information about who to speak to if there are any concerns, with visible contact points around safety issues and a dedicated Health and Safety officer. In our view, if a tenant does not voice concerns because they do not know who to speak to, then we believe that there has been a system failure and a communication failure on the part of the landlord.

In terms of **mechanisms to hold landlords to account**, these should be both 'downwards' (through formal regulation) and 'upwards' (locally owned by tenants). We believe that, with support, tenants can and should be supported to take an active role in assessing whether standards are being met. We were pleased to see the Hackitt Review recognising that residents have an important role to play in identifying and reporting issues that may impact on the safety of buildings. We believe that this is something that we can work with government on as we move forward, to ensure that resident scrutiny is at the heart of any new system whether looking at existing homes or talking about new developments. This must look not just at formal resident scrutiny mechanisms, but also provide routes for all residents to have a voice around safety issues.

However, in addition to the tenant role, there also needs to be real teeth within the regulatory system to ensure that landlords are meeting the agreed set of standards around safety. We firmly believe that the safety standard must be actively regulated, as a key part of a wider regulatory settlement. The Regulator should have the powers of inspection around safety standards and wider decency, and there should be clear penalties for landlords who fail those inspections.

The response to enforcing clear, commonly understood standards cannot be just for the regulator alone. Empowered, well-informed, well-supported and confident tenants can also play a key role, for instance, with trained tenants or resident inspectors inspecting designated areas and having a direct line of sight and reporting to senior managers.

Taken together, we believe that clear information on what is expected, clear information on what is provided, formal regulation and empowered tenants can underpin a step change in ensuring homes are safe. However, in addition to safety, it is reassuring to see the Green Paper also highlighting issues about decency, and this is something that we would strongly support.



A similar set of principles can also inform a renewed approach to decency, with clear expectations and consequences if those expectations are not met. The first step towards this will be revisiting the Decent Homes Standard, which we believe is not good enough, and ought to be replaced by a Decent Homes Plus Standard, which could also potentially apply to the private sector. The detail of what this could cover is something that needs to be co-created with landlords and tenants, and we would be happy to be involved in shaping that – with landlords, government and tenants.



Principle 2 – Effective resolution of complaints

When things do not work as they should, one of the key tests for any organisation is how it deals with, and learns from, complaints. The most customer focused organisations in the private, public and voluntary sectors, see complaints as a valuable mechanism for feedback that allows them to improve.

We would like to see a sector wide shift in the understanding of how responding to, and dealing with, complaints can help drive better performance and build confidence of tenants and residents. At the heart of this needs to be a cultural shift that sees complaints not as a ‘problem’, but as an opportunity to learn and improve. One of the ways that this can be delivered will be through a much more active tenant involvement in publicising, supporting and helping others navigate through, the complaints process.

The visibility of routes of redress, and the way in which they are resourced to support tenants is also a key part to building more confidence in the complaints system. Tpas calls for increased resources and funding to be allocated to the Housing Ombudsman to ensure they can discharge their role effectively. We call too for the Housing Ombudsman to be more visible, with a clear strategy for communicating and engaging with tenants.

A visible, well resourced and effective complaints process is particularly important for housing providers because of the lack of market power that tenants often have. In other sectors consumers have market power – put simply if they are unhappy they can choose to take their custom elsewhere. For most social housing tenants this is simply not an option. What that means is that landlords do not always have the same market incentives to address ‘customer’ unhappiness as providers of goods and services in other sectors.

We support the proposals in the Green Paper to simplify and speed up the complaints process. Our consultations suggested that what all parties want to see is a complaint process which is what we are calling **fixed, fair and fast**.

- **Fixed** – with an outcome focused national standard that applies to all landlords in the same way, bringing consistency to how complaints are handled.
- **Fair** – a system where tenants fully understand the system and are confident that their complaint will be looked at fairly, and from a presumption that there is a legitimate problem to be addressed.
- **Fast** – complaints should be dealt with in a timely way. The current period of 9 months on average for a complaint to reach the Ombudsman is simply too long and must be reduced.



Part of speeding up the process must involve the removal of unnecessary red tape and bureaucracy around complaints. Tpas believes that the current eight week waiting period is too long and as an absolute minimum should be reduced to four weeks.

Tpas believes that the democratic filter had the potential to positively impact on the complaints process for tenants but in reality now it is little understood by tenants and landlords. Apart from a handful of cases across the country it is poorly utilised, overcomplicating and delaying the complaints process. There is currently huge variation in the time organisations take to respond to complaints and we believe there is huge opportunity to build on the best that we see in the sector and roll that out as the standard to aspire to.

Developing a better set of processes and systems for when things go wrong is essential, but what is also needed is a cultural shift in how landlords see complaints and those who complain. The best way to achieve this is by active engagement and involvement of tenants in shaping the way in which organisations deal with complaints. Additionally, too much focus on redress and escalation misses the point that a well-functioning complaints system would deal with complaints effectively at the earliest possible stage, with no need for escalation. One of the ways in which this could be achieved would be local mediation where trained tenants work to resolve complaints prior to escalation. Such models do exist at the moment, and we would ask government, and landlords, to look at how such models can be supported and more widely adopted across the sector.

As with empowering tenants to hold landlords to account over safety, at the heart of a more effective approach to complaints will be accessibility and visibility. Understanding and navigating an organisation's complaints process must not be a barrier to raising concerns. The responsibility for making sure that the complaints procedure is widely understood and used is, fundamentally, the responsibility of the landlord rather than the tenant. Much more can be done to make tenants aware of the options around complaints, including ensuring that they are aware of the role of the Ombudsman and how to contact them.

In some cases, having an advocacy service available can help, as some people may lack the confidence to complain. Tenants are also well placed to support one another in understanding and navigating the complaints process. Our consultation indicates there is potential for much more active tenant input in organisation's complaints processes.

The benefits of this approach will be for landlords as well as tenants. There is already some very good practice in the sector around complaints that could be shared more effectively. The most effective organisations regard complaints as a positive form of feedback that can help drive improvements. This forms part of a more open and transparent approach around complaints.



Alongside this, we want to see a requirement for landlords to have a more open and systematic approach to reporting on their complaints handling processes. These approaches could combine KPIs with more detailed examples of complaint handling, but the specific form of them is something which landlords and tenants work together to co-create as we move forward.



Principle 3 – Empowering residents and strengthening the regulator

Throughout the Green Paper, there is an awareness that a key way to drive higher standards and better outcomes is to ensure that there is both ‘upward’ pressure from tenants and ‘downward’ pressure from the regulator. We firmly believe that most landlords are driven by an ambition to be the best organisation that they can be. The very best know that engaged, active and questioning tenants can help them achieve this.

If this is to be achieved, then tenants need the tools to support them in helping their landlords deliver higher standards. Our Green Paper consultation has identified four key requirements that would help do this:

- **Information and data** – landlords operating in an open and transparent way, and providing data on performance, allows tenants to understand the service they are receiving and raise questions about it.
- **Providing a national voice** – at the moment discussions about policy are dominated by government and by bodies representing landlord interests. Tenants need to have a mechanism to be part of those national conversations.
- **Local involvement with your own landlord** – listening to tenants, and involving them, in different ways, in shaping and monitoring the services that they receive is essential.
- **Active regulation** – consumer regulation must be a core part of the regulatory framework alongside a strengthened Tenant Involvement and Empowerment standard

Access to good quality and consistent information and data is one of the key ways that tenants will be able to hold landlords to account. This needs to be meaningful to tenants and should focus on a small number of critical service areas (for instance health and safety). Tpas believes that this data should focus on the individual organisation and should not feed into the production of league tables. The reasons for this are that comparing different organisations is not only problematic, but in a sector where it is often impossible to exercise choice over your landlord, essentially pointless.

In our consultation with tenants there were also repeated concerns that league tables could end up increasing stigma for some tenants. We do not believe that the production of league tables would help tenants or improve performance, and therefore do not believe that this is the route that government should take.



However, clear, accessible organisation level data against a small set of KPIs is an important mechanism to drive better standards and should act as a trigger for regulatory involvement. Tpas believes that the KPIs set out in the Green Paper are the right ones, and we are keen to work with government to help develop a strong and robust KPI on “respectful and helpful engagement with residents” that commands the confidence of tenants.

We also believe that more thought could be given to additional KPIs on quality, particularly around levels of fuel poverty and how shared outside space is managed and maintained.

Moving forward, we also believe that there is merit in looking at other resident led triggers that could potentially lead to active regulatory involvement, providing a clear mechanism for tenants and residents to raise concerns and hold their landlords to account.

In terms of providing **a national voice for tenants**, we believe that at present the absence of tenant voices in national policy debates (which are dominated by providers and government) is a serious gap. Filling that gap is not straightforward, but we are clear that it does need to be filled. There are number of ways in which a body of this nature could be constituted and we invite the government to commission a project to look further into how a national voice for tenants can be established and maintained in a way that is clear on its objectives and has the confidence of tenants, government and landlords.

Local involvement with your own landlord – there are a range of ways that tenants and residents can be involved both in running the organisation that provides their home, or shaping the services that they receive. The mechanisms for delivering this are varied, but what must be consistent is a commitment and requirement to active tenant involvement and engagement that is a positive force for improvement of services.

There is no one model for this, and there are already different examples within the sector of excellent practice – for instance:

- Scrutiny mechanisms.
- Devolved budget and decision making to resident boards.
- Tenants being involved in recruiting contractors.
- Service review groups.
- TMO's, Gateway, mutual and community led housing models.

We believe there would be value in working with government and sector bodies to pull together examples of the very best practice to identify elements that may be able to be rolled out more widely. For scrutiny in particular, tenants and staff across the country were able to point to clear examples where this had led to improved services for tenants and greater efficiency and value for money. Tpas believes scrutiny should be more robustly regulated across the sector but based on outcomes not structures as part of a strengthened Tenant Involvement and Empowerment standard.



Active regulation – we firmly believe that many landlords are committed to deliver the best services that they can. However, we also know that sometimes things can go wrong. When they do, there needs to be a confident, focused, proactive and muscular independent regulator, with a clear remit to intervene in this area. That regulator must be able to work with landlords, and tenants, to identify any shortcomings and find ways to address them.

To have a more effective regulation, Tpas believes there needs to be:

- **Genuine independence.** Tpas believes that establishing the regulator as a standalone Non-Departmental Public Body accountable to Parliament is a welcome step in helping to deliver this.
- **A new consumer standard** (i.e. a C1 rating), consistent across all providers of social housing, which is reported on, and potentially backed up by randomised inspections of providers which will need to draw on tenant led expertise. The serious detriment bar should be substantially lowered to a far more meaningful level of intervention for tenants and the services they receive.
- **Empowered tenants** who are seen as a key part of the wider regulatory settlement. This is not something that organisations should be able to ‘opt out of’. We ask that actively engaging tenants itself becomes regulated as part of a revised governance standard. It is critical that this requirement focuses on culture and not just mechanisms, looking at how all tenants and residents are involved, not just a smaller subset of actively engaged tenants. Boards should be able to demonstrate, and prove, that tenant consultation and tenant views have taken place in any policy and service facing decisions that impact on tenants.

There should also be detailed reporting on the identified KPIs and intervention from the regulator where this information is not published.



Principle 4 – Tackling Stigma and celebrating thriving communities

During the roundtables that Ministers hosted following the Grenfell Tower fire, and in the subsequent debates around the role and purpose of social housing, the perception of stigma has repeatedly been raised. This issue also emerged consistently during the conversations that we have had with tenants and landlords as part of our consultation.

One of the principles that we identified at the start of this document was around the need to see Social Housing as a ‘legitimate tenure’. Social housing is not second-class housing. The people who live there are not second-class people. Yet all too often there is a pervasive sense that the people who live in social housing have ‘failed’ in some way, particularly by politicians and the media.

Addressing stigma, and perception, is a long term and difficult challenge that needs a coordinated and consistent approach across a number of groups:

- **Political** – central to addressing the issues of stigma is local and national political leadership and policy making.
- **The public/media** – media representations of people living in social housing often create a degree of public hostility and stigma, based on a representation which isn’t accurate or representative.
- **Landlords** – sometimes, the culture within landlord organisations and local authorities sees tenants as people who need ‘looking after’ rather than people paying for them to provide a service.

Firstly, regarding **political leadership**, national government must continue to lead a much more active national conversation about the value of social housing, what it is and who it is for. For too long politicians have often spoken of those in social housing in terms which have been pejorative, patronising or hostile. The PM recently saying that those who live in social housing are not second class and are “our friends and neighbours” feels like an important moment. This is something we need to continue to build on. However, it is important to remember, that stigma is not caused by one big thing, but by hundreds of smaller things and addressing it will require many statements and actions, not just one.

Stigma is not only a result of a specific, deliberate attack on those in social housing, but instead has built up over time through consistent negative messages – such as implicit messages around what good and bad housing outcomes look like. For example, over the past decade, the focus of government policy in favour of home ownership has fed a perception that ownership is a tenure for successful people and renters; that particularly social renters have somehow ‘failed’. We recognise that this messaging is changing, and this is welcome and overdue.



However, we believe that all parts of government, particularly the Department of Work and Pensions, needs to continually challenge themselves to speak about those in social housing in a more balanced way, which shows political leadership and sets a template for a wider more balanced public debate. We also believe that when government is developing new policy ideas, then they should specifically be asking the question “will this make things better or worse for people living in social housing”.

In short, tackling stigma does need to be about the language we use, but it also needs to be about action. For instance, Tpas firmly believes that one of the most effective ways to address stigma is through funding more social homes.

This political discourse feeds, and to some extent, legitimises, **media representation** of social housing tenants which present them as different from readers, listeners and viewers. We feel that much more work and **public awareness campaigns** need to be carried out showcasing the positives of our diverse communities and to celebrate them. The government needs to take an active role in this, working with housing providers and tenants to promote a more positive view of the wider benefits that social housing brings to society.

Finally, we believe that **internal culture within landlord organisations** deserves some attention with regards to the language that is often used when addressing tenants. Landlords and their staff shouldn't assume vulnerability and that tenants will get things wrong or are not skilled enough. Similarly, local authorities, as landlords and place makers have a key role to play. Landlords and local authorities need to listen to the residents and provide what they need and ask for, not what the authority or landlord thinks that they need. At the heart of this is a tenant centred approach, which begins with a strong organisation wide understanding of who tenants are and the commitment, and capacity, to engage them.



Principle 5 – Expanding supply and supporting home ownership

One of the problems that we face as a nation is the long-standing undersupply of homes in general and of social housing in particular. Recent research by Heriot-Watt University has suggested that we require 90,000 social rent homes each year.

Strong views were expressed during our consultation about supporting local authorities to build again, and we welcome the recent announcement, during the PM's party conference speech, to remove the borrowing cap to support a new generation of council houses. More could still be done, to stem the loss of council housing through Right to Buy or, at the very least, making it easier to retain and use receipts from sales to build replacements.

However, on this issue we are relatively confident that government, and the other main political parties, are finally grasping the scale of the problem of undersupply, and the need to focus on delivering a wider range of tenures than home ownership products. Our key message on this is to ensure that new supply works for all parts of the country and for all groups within society – with an emphasis on truly affordable social homes for rent and a move away from a housing policy which is overly focused on home ownership.

The new longer-term strategic approach to investment that Homes England is adopting is welcome. However, there is still room to look at more creative and innovative approaches to land supply.

In terms of engagement, more thought needs to be given to how to engage those not currently living in a community who may need a home rather than just those who live in that community who are already, potentially, well housed.



Conclusion

This submission began by welcoming the debate that has been triggered by the Green Paper, recognising that there is now an opportunity to change the way in which we build, manage and speak about social housing in this country.

It is entirely right that the Green Paper is broad in scope and seeks to look at a wide range of different issues. However, for us as Tpas, the most fundamental thing is that we take this opportunity to ensure that, in words and actions, social housing tenants are not viewed as second class or without a legitimate right to have their views acted upon. This cannot be about what the sector can do 'for' social housing tenants, but what we do 'with', together in partnership.

The Green Paper will lead to changes in the sector. However, unless these changes are shaped by tenants, landlords and government working together, then they will not stick. If we want to see a shift in culture, as well as individual practices changing, then embedding change is essential.

Throughout this submission, as well as a number of specific asks of government, we have also made a number of offers. We want to work with government, and with others, to get this right and to bring about the sort of change that we all want to see. This could be working on developing a shared vision for social housing and testing that with tenants, identifying replicable practice, helping develop KPIs around engagement or feeding into a revised governance and consumer standard that actively agrees how tenants are involved.

The Green Paper is a good start, but it is only the start. We stand ready and willing to work with government and others to turn it into the reality that we all want to see.



Annex A

Members' events organised to gather views on the Green Paper.

Tpas held a number of events with a view to engage with as many tenants and housing staff as possible, face to face and also online. We organised:

- Six members' regional events across England in Northampton, Blackpool, York, Thetford, Norfolk, London and Tiverton Devon attended by tenants, landlord staff and other stakeholders. Circa 290 people in total.
- Three specific Social Housing Green Paper Summits in London, Nottingham and Manchester with housing staff. Plus in-house consultation sessions run at landlord organisations with staff. Circa 100 people in total.
- A Tpas Board member's discussion on the Green Paper