



## **Consultation on changes to our consumer standards and requirements**

### ***G15 Residents' Group Response***

28 February 2026

The G15 Residents' Group (G15RG) represents residents across G15 housing associations. This consultation response is based on the views from this diverse group of residents and representative of the 850,000 the G15 landlord's house.

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#### **Introduction**

This consultation response reflects the views expressed by residents during the G15RG consultation discussion on the Regulator's proposed consumer standards changes. Across all six questions, the group's overall position was **majority agreement**, with a small number of residents indicating uncertainty. However, residents also identified several important considerations that they believe should inform how the standards are interpreted, implemented and monitored.

These reflections centre on practicality, proportionality, clarity of scope, cultural change, and ensuring that regulatory expectations translate into improved lived experiences for residents.

The G15RG recognises that many of our concerns closely align with those raised by G15 landlords, particularly around the pressures created by unclear definitions, mixed-tenure complexities and the resource burden of implementing STAIRS. Both residents and landlords highlight that increasing regulatory demands risk diverting limited capacity away from essential services such as repairs and safety, and that proportionate expectations, clearer segmentation of responsibilities, and stronger contractor accountability are essential to avoid placing undue operational strain on providers. This shared perspective reflects a common commitment to ensuring the standards are effective, deliverable and genuinely improve outcomes for residents.

#### **Part 1 — Transparency, Influence and Accountability (TI&A)**

##### **Consultation Question 1**

**Do the proposed changes to the TI&A Standard accurately reflect the government's STAIRS Direction?**

**Overall response: Yes, with a few unsure.**

Residents broadly agreed that the Regulator has **accurately translated the STAIRS Direction** into the revised TI&A Standard.

However, the G15RG discussions highlighted several narrative themes:

##### **1. Proportionality and impact on landlord resources**

Residents expressed **significant concern** about the cost and administrative burden associated with implementing the STAIRS requirements, noting that such pressures may divert resources from essential services such as repairs.

## **2. FOI vs STAIRS — fairness and parity**

Some residents felt STAIRS should have been aligned to Freedom of Information provisions to ensure **full parity for housing association tenants and council tenants**, while others appreciated the broader rights provided under STAIRS.

## **3. Scope and tenure clarity**

There was repeated uncertainty regarding the applicability of STAIRS to shared owners, leaseholders and residents in mixed-tenure blocks. This was seen as a potential risk to safety and consistency.

## **4. Managing repetitive or malicious requests**

Residents emphasised the need for landlords to have fair mechanisms to manage excessive or vexatious enquiries without harming core services.

## **5. Consistency and comparability**

A strong preference was expressed for **uniform templates and standardised formats** to support meaningful scrutiny across landlords.

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## **Consultation Question 2**

**Do the proposed changes to the TI&A Standard accurately reflect the Competence and Conduct Direction?**

**Overall response: Yes, with a few unsure.**

Residents agreed that the wording technically reflects the Direction, but felt it does not fully address the **cultural and behavioural change** they expect.

### **1. Need for genuine cultural change**

Residents noted that qualifications alone will not deliver better services, empathy or trauma-informed practice, and warned against a “tick-box” approach.

### **2. Accountability gaps**

There was strong interest in how landlords will be held to account for their codes of conduct, including how breaches will be assessed and by whom.

### **3. Workforce impacts and diversity risks**

Concerns included the risk that qualification requirements may inadvertently reduce workforce diversity or exclude talented, experienced staff.

#### **4. Contractor behaviour**

Residents emphasised that many poor experiences involve contractors rather than landlord staff, and sought clarity on how expectations will be extended to contracted services.

#### **5. Inclusion of resident voice**

Residents questioned why they were not more centrally involved in shaping the Direction and expressed a desire for stronger requirements around resident engagement.

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### **Consultation Question 3**

**Do the proposed changes to the specific expectations in the TI&A Standard for the Tenant Satisfaction Measures (TSMs) make sense?**

**Overall response: Yes, with a few unsure.**

Residents supported the inclusion of statutory safety measures, including electrical testing data, but identified important issues requiring further clarification.

#### **1. Clear delineation of tenures**

Because shared owners and leaseholders may be responsible for their own electrical systems, residents stressed the need for **clear segmentation** to avoid misleading performance comparisons.

#### **2. Missing resident-experience indicators**

Residents felt the TSMs measure landlord compliance but overlook key aspects of the customer experience, such as:

- respectful conduct
- appointment failures
- accessibility
- safety concerns during visits

#### **3. Data consistency and comparability**

Residents highlighted existing variability in landlords' reporting systems and reiterated the need for **uniform definitions and templates**.

#### **4. Safety gaps in mixed-tenure buildings**

Uneven obligations for leaseholders in mixed blocks were viewed as a serious safety and policy gap.

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## **Part 2 — Code of Practice**

### **Consultation Question 4**

**Do you agree with the proposed changes to the Code?**

**Overall response: Yes, with a few unsure.**

Residents agreed the Code reflects the Directions, but raised broader concerns.

### **1. Need for explicit behavioural expectations**

Residents want clearer expectations relating to communication, empathy, trauma-informed delivery, responsiveness and respect.

### **2. Expectations for boards**

Residents stressed that cultural competence and engagement understanding must extend to board members, not just operational staff.

### **3. Unclear accountability framework**

Questions were raised about how the Regulator will judge compliance with the Code and how this might influence regulatory ratings.

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## **Part 3 — Electrical Safety TSM**

### **Consultation Question 5**

**Will the proposed TSM provide an appropriate level of information about landlord performance?**

**Overall response: Yes, with a few unsure.**

Residents agreed the TSM is important but highlighted several limitations.

#### **1. Compliance vs lived experience**

The proposed measure focusses solely on compliance and does not capture whether residents feel safe, respected, or well-informed during visits.

#### **2. Influence of tenure on data accuracy**

Where landlords do not control testing for leaseholders or shared owners, the resulting data must be clearly segmented.

#### **3. Broader building safety implications**

Differences in obligations within mixed blocks were identified as a significant risk that should be reflected in impact and equalities assessments.

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## **Part 4 — Equality and Regulatory Impacts**

### **Consultation Question 6**

**Have any equality or regulatory impacts been overlooked?**

**Overall response: Yes, with some residents unsure.**

Residents identified several areas where impacts may not yet be fully addressed.

### **1. Mental health, trauma and resident vulnerability**

Residents emphasised that the regulatory framework should better reflect trauma-informed working and safeguarding complexity.

### **2. Frontline worker wellbeing and safety**

There were concerns about emotional labour, threats, verbal abuse and disproportionate impacts on younger staff, women and minority groups.

### **3. Risks to workforce diversity**

Qualification requirements may disadvantage older workers, carers, neurodiverse people, disabled workers, and those with strong lived experience but limited formal education.

### **4. Contractor conduct and equality impact**

Poor contractor behaviour can disproportionately affect vulnerable residents, and the regulatory expectations for contractors remain unclear.

### **5. Safety and inequality in mixed-tenure buildings**

Different safety obligations for leaseholders may disproportionately affect minority ethnic households, low-income residents, disabled people and older residents.

### **6. Barriers to transparency**

Without standardised formats and accessible presentation, residents with limited digital literacy or language barriers may face difficulties engaging with published information.

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## **Conclusion**

While the G15 Residents' Group broadly supports the Regulator's proposed changes, residents emphasise that successful implementation will require:

- clearer definitions and scope
- stronger focus on culture, behaviour and resident/tenant experience
- firm expectations for contractors
- meaningful accountability mechanisms
- attention to equality impacts and safety across tenures
- standardised, comparable reporting formats

These insights reflect the collective lived experience and expectations of the G15 Residents' Group and are offered to support a more effective, fair and resident-centred regulatory framework.

**Signed G15 Residents' Group**