
G15 Residents' Group Response to the Regulator of Social Housing Call for Evidence: More and Better Social Homes

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The G15 Residents' Group is an independent, resident-led strategic forum bringing together residents living in social and affordable homes provided by the G15. The group consists of two residents from each G15 housing association, collectively bringing a combination of lived experience, governance expertise and sector knowledge to influence housing policy at a strategic level.

We work alongside the G15, which provides homes for 880,000 households across England and houses one in ten Londoners. Through engagement with government, the Mayor of London and sector partners, members bring informed residents' perspectives to influence national, regional and local housing policy before decisions are made.

The G15 Residents' Group (G15RG) welcomes the opportunity to contribute to the Regulator of Social Housing's Call for Evidence on *More and Better Social Homes*.

Our response is informed by:

- The collective lived experience of G15 Residents' Group members living across a wide range of housing associations, neighbourhoods and tenure types, including social rent, affordable rent, shared ownership, leasehold and specialist housing.
 - Extensive resident leadership experience, contributing to engagement and influence across the housing sector.
 - Experience of influencing decision-making at board, executive and regulatory level, providing insight into how governance, accountability and organisational culture affect resident outcomes.
 - A collective experiences, insights and priorities across G15 housing associations, which together provide homes for around 880,000 households and house one in ten Londoners.
 - Previous G15 residents' group consultations and published reports, including contributions in G15's *A City That Works for Everyone*.
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Summary of Response

The G15 Residents' Group supports the delivery of more genuinely affordable social homes. However, we do not believe a more permissive regulatory framework should come at the expense of existing residents, existing homes or long-term sector stability.

Social housing providers exist primarily to provide safe, secure, affordable and sustainable homes. The regulatory framework must therefore maintain a balanced approach that gives equal weight to consumer and economic outcomes, recognising that existing homes are essential social infrastructure and should be valued alongside future development.

We support robust financial resilience, good governance and long-term investment capacity. This increased flexibility for providers should be accompanied by strong safeguards, accountability and transparency. Growth ambitions should not weaken investment in existing homes, reduce service quality, increase resident risk or undermine affordability.

The Regulator should adopt a more risk-based and intelligence-led approach, with greater scrutiny of large and complex providers where potential impacts on residents, homes and communities are greatest. Resident evidence, complaints, scrutiny findings and lived experience should play a stronger role in identifying risks, informing regulatory decisions and supporting earlier intervention.

Residents should have greater influence over decisions affecting their homes and services, including organisational change, investment priorities and development ambitions. Providers should demonstrate how resident insight has informed decisions, improvement priorities and business planning, and report openly on progress and outcomes.

The G15 Residents' Group also believes the future regulatory framework should place greater emphasis on organisational culture, conduct, accountability and resident outcomes. Consumer regulation should carry the same visibility, confidence and organisational importance as economic regulation ensuring residents benefit from the same level of assurance, scrutiny and protection currently provided to investors and lenders.

Ultimately, the objective should not be a choice between more homes or better homes. The sector must be supported to deliver both, whilst ensuring existing homes, resident wellbeing and the long-term social purpose of housing associations remain at the centre of decision-making.

1. Essentials: for More and Better Homes

Please give your views on how we can further promote the essential characteristics of social landlords to deliver more and better social homes. In particular, we are keen to hear your thoughts about:

1. **ensuring social housing is central to all RPs**
2. **independence and autonomy of RPs to protect tenants and social housing**
3. **ensuring there are clear expectations of landlords that promote growth and resilience**
4. **promoting good governance across all landlords**
5. **protecting tenants and their homes in the case of failure**
6. **enabling growth and new entrants with novel models or structures whilst protecting tenants and the value of the sector.**

1.1. Ensuring social housing is central to all Registered Providers (RPs)

1.1.1. The G15 Residents' Group believes the essential character and purpose of social landlords must remain the provision of safe, secure, affordable and sustainable homes for current residents. Growth for future residents should support this purpose, not compete with it. Whilst we support the ambition to deliver more social homes, residents are concerned that increasing pressure to build new homes could unintentionally reduce investment in existing homes, services and communities. Housing associations are already responding to significant obligations relating to building safety, damp and mould, energy efficiency, climate adaptation, electrical safety, emergency repairs and future Decent Homes requirements. The regulatory framework must therefore ensure that growth ambitions are balanced with stewardship of existing homes, resident wellbeing and the long-term affordability of social housing.

1.1.2. Social homes should be viewed as national social infrastructure. Maintaining, improving and protecting existing homes should be given equal importance to developing new homes. We support a regulatory approach that reinforces this ambition, whilst recognising that many wider factors, such as economic situations and income certainty, will also influence a provider's ability to deliver more homes.

1.1.3. Affordability must remain a core measure of success for Registered Providers. The ambition to deliver more social homes should not be separated from whether existing homes remain genuinely affordable to the people they are intended to house. Rising costs associated with maintaining, improving and decarbonising homes continue to place pressure on residents through rents, service charges and energy costs. Providers should demonstrate how resident affordability is considered within strategic decision-making, long-term planning and investment priorities.

1.1.4. Failure to consider affordability risks undermines the fundamental purpose of social housing and the origins of many housing associations: providing genuinely affordable homes for people in housing need.

1.1.5. Residents are also increasingly concerned about how rental income is used and the limited influence they have over decisions that directly affect investment in their homes, neighbourhoods and services.

1.1.6. Residents recognise the importance of financial resilience, long-term rent certainty and the ability of providers to plan, borrow and invest. However, there is concern that organisational success is increasingly assessed through financial and development metrics, with insufficient emphasis placed on the quality, affordability and sustainability of homes and services. A financially sustainable housing association is important, but so is a financially sustainable household.

1.1.7. The introduction of the Consumer Standards represents an important and welcome step towards redressing this imbalance. Residents believe they have strengthened accountability, transparency and safety, but there remains some way to go before consumer regulation carries the same influence, visibility and weight as economic regulation. The Consumer Standards should continue to evolve, place greater emphasis on organisational culture and resident outcomes, and become an equally important driver of organisational performance.

1.1.8. Residents believe the success of social housing providers should ultimately be judged by the quality, affordability and sustainability of the homes, services and outcomes they deliver for residents.

1.1.9. The G15 Residents' Group supports proposals for the Regulator to reinforce the mission and social purpose of Registered Providers. Social purpose should remain central to all providers, regardless of organisational size, commercial activity or development ambitions, recognising that their primary role is to provide and protect social homes. This should be reflected within regulatory expectations, inspection priorities and assessments of organisational performance.

1.1.10. We also support enhanced reporting expectations on financial resilience, recognising that clear expectations and safeguards are necessary to provide confidence, support future investment and enable the delivery of new homes. However, regulation should support providers not only to build more homes, but to build the right homes, ensuring that new supply meets housing need, remains genuinely affordable and delivers positive outcomes for current and future residents.

1.2. Independence and Autonomy of Registered Providers to Protect Residents and Social Housing

1.2.1. Housing associations must retain the flexibility and independence required to respond to local needs and changing circumstances, make long-term investment and development decisions, and access the finance necessary to sustain and grow. However, this autonomy must be accompanied by strong accountability to residents, communities and the public interest.

1.2.2. The G15 Residents' Group supports a framework in which providers have the freedom to determine how best to fulfil their social purpose, while residents have meaningful influence over decisions that affect them and regulators have sufficient powers to intervene where homes, services, financial sustainability or residents' interests are at risk.

1.2.3. Residents believe accountability should extend beyond compliance and financial performance. Providers should be able to demonstrate how strategic and operational decisions improve homes, services and communities, and how resident perspectives have informed those decisions. While resident outcomes are reflected within existing governance and consumer standards, residents do not consistently have clear evidence of how decisions about their home

and neighbourhoods are expected to benefit them or how potential adverse impact have been considered and addressed.

1.2.4. Residents recognise that difficult decisions are often required. However, they should be able to understand how decisions have been reached, how resident interests have been considered before decisions are made, and how anticipated benefits will be realised in practice. Meaningful influence requires residents to be informed and engaged early enough for their views to shape outcomes rather than simply comment on decisions that have already been taken.

1.2.5. As housing associations increasingly work through partnerships, contractors and complex group structures, accountability must remain clear. Residents should always know who is responsible for services, how decisions are made, and how concerns can be raised, considered and resolved in a transparent and timely manner.

1.3. Ensuring there are clear expectation of Landlords that Promote Growth and Resilience

1.3.1. Residents support the delivery of more social homes but believe growth should only be pursued where organisations can demonstrate the capacity to maintain existing homes and services. Growth, financial resilience and organisational sustainability should be assessed alongside:

- Quality of existing homes.
- Investment in repairs and maintenance.
- Building safety.
- Service performance.
- Resident satisfaction.
- Community investment

Protecting and improving existing homes, alongside building new ones, should remain a defining characteristic of successful social landlords.

1.3.2. The strongest organisations are those that remain focused on their social purpose whilst balancing development ambitions, financial resilience and resident outcomes. Organisational success should be assessed not only through growth and financial performance but also through the quality, safety and sustainability of homes and services delivered to residents.

1.3.3. The role of the Regulator should be to provide assurance that providers have the governance, financial resilience, risk management and organisational capacity necessary to deliver their agreed strategies safely and sustainably. The regulatory framework should not inadvertently create incentives for boards to prioritise development volumes over other legitimate objectives, including investment in existing homes, building safety, service quality, neighbourhoods and resident experience.

1.3.4. Organisational resilience extends beyond financial viability. Growing risks include:

- Climate change.
- Flooding and overheating.

- Decarbonisation and retrofit requirements.
- Ageing homes.
- Long-term asset stewardship

1.3.5. Future Economic Standards should place greater emphasis on the quality and sustainability of homes as key indicators of resilience.

1.3.6. Mergers and acquisitions should also be viewed through this lens. Whilst mergers may improve financial capacity and development potential, they should not weaken local accountability, service quality or resident influence. The Regulator should ensure resident outcomes remain central before, during and after organisational change.

1.4. Promoting Good Governance across all landlords

1.4.1. The Value of Strategic Resident Involvement. The G15 Residents' Group believes resident influence should be recognised as a characteristic of good governance and organisational resilience. The strongest housing associations are those where resident insight informs:

- Corporate strategy.
- Business planning, including delivery and closure of business plan commitments.
- Risk management.
- Investment priorities.
- Management of assets and homes.
- Service redesign.
- Development programmes.
- Organisational culture.
- Reporting back clear achievements, outcomes and ongoing improvements to resident through governance structures.

1.4.2. Residents often identify risks long before they appear in performance reports. Lived experience provides valuable intelligence about service quality, organisational behaviours and resident outcomes that cannot be captured through financial metrics alone. For example, issues with repairs delivery can often be identified through residents' experiences in real time, yet formal evidence through Tenant Satisfaction Measures, complaints analysis and determinations or staff reporting may take months to reach strategic decision-makers.

1.4.3. Inclusive leadership must include lived experience. Whilst boards increasingly focus on professional diversity, demographic diversity and protected characteristics, lived experience remains one of the least represented forms of diversity within leadership structures. There remains a tendency to seek experience from professionals outside the sector rather than recognising the value of first-hand experience from within it. Residents serving on boards and in leadership roles can bring direct insight that influences organisational culture, decision-making and residents focus in ways that cannot be replicated through consultation alone. The Regulator should assess lived experience representation alongside other measures of diversity and inclusion.

1.4.4. Housing associations cannot fully understand the communities they serve if those communities are absent from decision-making processes. The Regulator should encourage providers to:

- Recognise lived experience as a core dimension of diversity and inclusion.
- Include at least two resident board members who have current experience living in one of their social homes.
- Ensure resident board members receive appropriate remuneration, with clear guidance regarding any implications for benefits and expense costs.
- Ensure residents can raise concerns, challenge decisions and hold providers to account through transparent and accessible processes.
- Reflect resident leadership within EDI reporting.
- Support flexible opportunities for resident board members.
- Remove barriers to participation, including provision of meeting arrangements that support participation by working residents and those with caring responsibilities.
- Treat lived experience as a governance competency within recruitment and succession planning processes.
- Embed accountability to residents as a characteristic of inclusive leadership.

Providers should publish information comparing the demographic profile of involved residents, scrutiny members and governance participants with that of their wider resident population. This would support transparency and help ensure engagement structures are representative of the communities they seek to influence.

1.4.5. The Regulator should lead by example by recognising lived experience as a core dimension of diversity within its own governance structures. Residents with direct experience of living in social homes should be visibly represented and actively involved in governance, decision-making and inspections, demonstrating the value of lived experience alongside professional expertise and other forms of diversity.

1.4.6. Residents should not just be consulted. They should be actively involved in governance, leadership and decision-making.

1.4.7. **Leadership Competence, Conduct and Culture.** Organisational culture matters as much as technical compliance.

1.4.8. A provider can meet regulatory requirements whilst still delivering a poor resident experience. Residents want to see evidence of:

- Respectful communication.
- Empathy and understanding.
- Trauma-informed approaches.
- Visible leadership.
- Meaningful learning from mistakes.

- Openness to challenge.
- Accessible information.
- Clear accountability.
- Responsiveness to concerns.

1.4.9. Residents continue to report experiences where concerns are dismissed, disbelieved or attributed to personal behaviours and lifestyles rather than being appropriately investigated. The sector's response to damp and mould, highlighted through the findings following the death of Awaab Ishak, demonstrated the risks of assumptions and bias influencing decision-making. The Regulator should explicitly assess how providers identify and address discriminatory attitudes, behaviours and practices when considering organisational culture, conduct and resident outcomes.

1.4.10. Board members should be held to clear expectations of conduct and accountability alongside executives and staff. Boards set the tone for organisational culture and should be expected to demonstrate the same standards of accountability, respect, leadership, learning and resident focus. The emphasis should be on behaviours, values and culture rather than qualifications alone, recognising the significant influence boards have on organisational performance and resident experience.

1.4.11. The Regulator should place greater emphasis on organisational culture and behaviours alongside formal governance structures. For example, talking directly to residents and visiting homes provides valuable evidence of whether culture change is being achieved in practice.

1.4.12. Expectations relating to competence, conduct and accountability should not be limited to landlords. Regulatory staff, including those with housing sector experience, may not automatically meet the standards of behaviour, engagement and resident focus expected of landlords. The Regulator should therefore establish and publish clear standards of conduct and accountability for its own staff, ensuring they demonstrate professionalism, respect, transparency, openness to challenge and meaningful engagement with residents in the exercise of their regulatory functions.

1.4.13. **Clear and accessible language is important.** Terms such as *customers*, *stock*, *assets* and *units* can reinforce stigma, create distance between staff and residents, and create barriers to participation. Residents are people living in homes, not customers purchasing products. Similarly, terms such as *vulnerable* and *hard-to-reach* can place responsibility on residents rather than encouraging organisations to understand and address barriers to engagement, participation and service access. Language also influences organisational behaviours and priorities. We welcome that Awaab's Law will reinforce the principle that repair issues such as damp, mould, cold homes and hazards will be understood and reported as potential health risks rather than simply maintenance issues, this can change the urgency of response, improve root-cause investigation and support earlier intervention to prevent harm to residents with strict time limits.

1.4.14. The Regulator should encourage an accessible language approach and also lead by example by promoting accessible and resident-focused language across the sector. It should actively challenge language that is confusing, exclusionary or stigmatising and encourage terminology that reflects the social purpose of housing associations. This should begin with the Regulator's own communications, regulatory judgements, consultation and engagement activities, ensuring residents can clearly understand decisions that affect their homes and communities.

1.5. Protecting tenants and their homes in the case of failure

1.5.1. The regulatory framework should place greater emphasis on protecting homes, communities and services when organisations experience financial, governance or operational difficulties. Residents should have confidence that regulation protects not only the organisation but also the people living in its homes. This should include:

- Early identification of organisational risk.
- Stronger use of resident intelligence as an early warning indicator.
- Clear communication with residents during periods of instability.
- Protection of service standards during organisational change.
- Monitoring of resident outcomes during mergers and interventions.

1.6. Enabling growth and new entrants with novel models or structures whilst protecting tenants and the value of the sector.

1.6.1. We support innovation and new delivery models where they increase the supply of high-quality social homes and improve outcomes for residents. However, innovation should never weaken day-to-day services, accountability, transparency or resident protection. All providers, including new entrants, should be expected to demonstrate the same standards of:

- Governance.
- Resident accountability.
- Transparency.
- Service quality.
- Social purpose.
- Long-term sustainability.

1.6.2. As services become increasingly outsourced and delivered through commercial partnerships, accountability must remain clear. Residents should always know who is responsible for delivering services and resolving problems.

1.6.3. Innovation should support the social purpose of housing associations and improve resident outcomes, not create additional complexity or reduce accountability.

2. Accountability for More and Better Homes

Please give your views on how we can further drive landlord accountability in the delivery of more and better homes. In particular, we are keen to hear your thoughts about:

1. **further scrutiny of landlords' plans and performance**
2. **requirements for landlords to appraise their capacity and set themselves targets for delivery of more and better homes**
3. **stress testing, flexes and mitigation plans**
4. **ensuring disposal decisions are contributing to long term growth**
5. **going further to drive efficiency**

2.1. Further Scrutiny of Landlords' Plans and Performance

2.1.1. The G15 Residents' Group supports stronger accountability mechanisms that balance growth ambitions with the quality of homes, services and resident outcomes. Accountability should focus on outcomes rather than compliance alone and demonstrate how providers use resources to benefit both current and future residents. It should provide residents with the same level of confidence that economic regulation currently provides for investors and lenders. Residents should have confidence that failures in repairs, complaints handling, safety and service delivery will be identified, challenged and improved.

2.1.2. This is not simply a regulatory issue. It is also an issue of equity and fairness. Where poor outcomes persist without visible challenge or intervention, it can reinforce perceptions that social housing residents are expected to tolerate lower standards. Strong accountability should improve services, build trust and ensure residents are treated with equal dignity and respect.

2.1.3. Residents support greater scrutiny of how housing associations balance development ambitions with their responsibilities to existing homes and residents. Providers should explain how their plan and performance address:

- The balance between investment in new development and existing homes.
- Long-term home quality, safety and sustainability.
- Environmental and climate risks.
- The influence of resident insight on major decisions.
- Organisational culture and continual improvement.
- The impact of growth, mergers and organisational change on residents and services.
- Value for money from both organisational and resident perspectives.

2.1.4. **Transparency of Regulatory Judgements.** The Regulator should publish an accessible summary alongside each regulatory judgement. This should clearly explain the evidence considered, areas of strength, areas requiring improvement, and how individual findings contributed to the overall judgement. Residents should be able to understand not only whether a provider has met the required standard, but where performance exceeds expectations, and

where improvements is still needed. This would reinforce that regulatory compliance represents a minimum threshold rather than a measure of excellence.

2.1.5. Accessible Regulatory Information and Resident Awareness. The Regulator should improve the accessibility, consistency and clarity of regulatory information so that residents can better understand landlord performance, regulatory expectations, their rights and the role of different organisations within the accountability framework. Information should be developed and tested with residents to clearly explain:

- Residents' rights and protections.
- The Consumer Standards.
- The role of the Housing Ombudsman.
- The role of the Regulator of Social Housing.
- The role of the Building Safety Regulator.
- Routes for resolving individual complaints.
- How residents can raise concerns where issues affect multiple areas
- How resident evidence contributes to regulatory oversight and early intervention.

Residents should not be expected to navigate complex regulations, complaints and building safety systems without clear, accurate and accessible information. This should include resident-friendly explanations of regulatory judgements, inspections, improvement plans and regulatory decisions.

2.1.6. Individual complaints should normally be addressed through the landlord's complaints process and, where appropriate, the Housing Ombudsman. However, residents should also be informed that they may share information directly with the Regulator of Social Housing where they believe there may be failures to meet regulatory standards, without waiting for a complaint investigation to conclude. Separate guidance should explain the responsibilities and reporting routes of the Building Safety Regulator, including how residents can raise building safety concerns.

2.1.7. Strategic Accountability and Resident Influence. Resident insight should be recognised as a strategic governance tool and a source of independent assurance. Providers should demonstrate how resident perspectives, lived experience and scrutiny have informed corporate strategy, business planning, risk management, organisational change, service redesign, and home and neighbourhood management. Engagement should be measured by influence and outcomes rather than activity or the number of meetings held. Providers should be able to evidence:

- What residents said and how those views were considered.
- How information was made accessible and understandable to support informed participation.
- How resident understanding was tested and evaluated.
- How resident insight influenced plans, priorities, performance decisions and improvement activity.
- How boards and senior leaders responded to resident challenge and recommendations.
- What changed as a result of resident influence.

- Where recommendations were not adopted, the reasons why.
- How residents were informed of decisions, outcomes and progress.

2.1.8. To strengthen transparency and accountability, the Regulator should consider requiring an annual **Resident Influence Statement** setting out how resident insight has informed strategic decisions, business plans, risk management, service improvements and organisational priorities. This should include board responses to resident recommendations, progress against improvement plans, complaints learning, key strategic decisions, and examples of where resident feedback resulted in change or was not adopted and why.

2.1.9. **Resident Impact Assessments.** *Resident Impact assessments* should be required for significant decisions and should inform decision-making before decisions are taken, rather than being produced retrospectively. Assessments should explain resident involvement, summarise resident views, assess likely impacts on residents and communities, identify alternatives that were considered and set out how adverse impacts will be mitigated. Resident Impact Assessments should incorporate equality considerations and be completed before decisions are made rather than retrospectively. Assessments should identify any disproportionate impacts on particular resident groups, demonstrate how residents have informed the assessment, be published alongside decision-making documentation and include arrangements for monitoring outcomes after implementation. Assessments should also consider cumulative impacts, recognising that residents often experience multiple policy, service or organisational changes simultaneously. They should apply to:

- Growth strategies.
- Mergers and restructures.
- Estate regeneration.
- Selling of large number of homes.
- Major policy changes.
- Significant service redesign.

2.1.10. **Accountability Across Different Tenures.** Residents continue to highlight issues within mixed-tenure developments. Residents should have confidence that safety concerns and service failures are addressed consistently regardless of tenure. The Regulator should ensure greater consistency across:

- Building safety responsibilities.
- Communication arrangements.
- Service standards.
- Resident engagement.
- Access to information.

2.2. Requirements for Landlords to Appraise their Capacity and Set themselves Targets for Delivery of More and Better Homes

2.2.1. The G15 Residents' Group supports requirements for providers to assess their capacity before committing to growth. Boards should make these decisions based on a clear understanding of the needs of existing residents, future residents, local housing demand and their organisation's ability to sustain services, maintain existing homes and remain financially

resilient. Growth should not come at the expense of current residents or the quality and safety of homes.

2.2.2. The Regulator should support robust decision-making through minimum expectations for financial resilience, governance and performance, alongside decisions about growth, development ambitions and organisational risk as board responsibility. The Regulator's role should be to assure itself that providers have appropriate evidence, governance and controls in place rather than prescribing development strategies or risk tolerances.

2.2.3. Providers should demonstrate how resident outcomes have been considered alongside financial and development objectives when setting business plans and delivery targets. Success should not be measured solely through the number of homes delivered, but through the quality, safety, affordability and sustainability of homes and services. Resident board members and involved residents should play a meaningful role in informing these decisions and helping providers understand local housing needs.

2.2.4. Development programmes should respond to identified housing need and prioritise genuinely affordable social rented homes. Providers should balance the delivery of additional homes with the creation of places where people can live well. Maximising housing numbers should not result in poorer design, reduced amenity space or homes that are less healthy, resilient or suitable for future challenges such as climate change and extreme heat. Success should not be measured solely by the number of homes delivered. New development should also be assessed on how effectively it meets identified housing need, supports healthy and sustainable communities, and enables residents to live well throughout different stages of life.

2.2.5. Providers should publish clear information on organisational capacity, development plans, delivery targets and progress against those targets. Where circumstances change, they should explain the impact on planned delivery, investment and services, including how decisions have been informed by residents and how resident outcomes will continue to be protected. Where regeneration programmes require residents to move from their homes, providers and local authorities should publish information demonstrating how many residents were rehoused locally, how many exercised a right to return, how many successfully returned and the barriers experienced by those who did not. Organisational growth, mergers and development activity should strengthen long-term resilience without reducing accountability, local relationships, service quality or resident influence.

2.3. Stress testing, flexes of more and better homes

2.3.1. The Regulator should require providers to undertake robust stress testing to assess the resilience of business plans under a range of financial, operational and development pressures. Stress testing should examine not only the impact on financial performance, but also the consequences for residents, homes and services. Boards should demonstrate how proposed responses would maintain safe and decent homes, essential services, regulatory compliance and resident confidence and satisfaction. Assessments should consider potential impacts on affordability, planned improvements, repairs, building safety, resident engagement and investment in existing homes.

2.3.2. Residents should receive clear information about the implications for their homes and services and rent, and how those implications have been considered in decisions to manage financial risk and organisational resilience.

2.3.3. This would provide a more complete picture of organisational performance and support earlier intervention where risks begin to emerge. Tenant Satisfaction Measures should continue to evolve to capture factors that reflect residents' experiences of service delivery, organisational culture, conduct and competence, including:

- Respect and dignity.
- Quality of communication.
- Accessibility of services and information.
- Appointment management.
- First-time and quality fix rates.
- Contractor behaviour.
- Missed appointments by contractors.
- Delayed repairs.
- The resident perspective on no-access reporting.

2.4. Ensuring the Disposal of Homes Supports Long-Term Growth

2.4.1. The G15 Residents' Group supports proposals to strengthen the retention of social homes within the housing association, not-for-profit and council housing sectors. Protecting existing social homes is an important part of the social purpose of Registered Providers and should sit alongside ambitions to deliver new homes. In areas of high housing demand and high property values, the loss of social homes can have a significant long-term impact on housing supply and affordability and role in meeting current housing need. Providers should therefore seek to retain social homes wherever practicable.

2.4.2. Residents recognise that retaining homes must be balanced against the costs and practical challenges where selling of homes support long-term organisational sustainability, investment capacity or the delivery of additional homes. However, providers should demonstrate:

- Why homes are being sold or transferred.
- The alternatives considered, including retention and improvement.
- The financial, operational and social implications of the decision.
- The impact on residents and local communities.
- How the proposal supports the long-term supply of social housing and resident outcomes.

2.4.4. Decisions should take a long-term view of housing need and community resilience. Providers should consider the value of maintaining a diverse range of homes, tenures and property types to meet the needs of residents, families, older people and future generations. Many existing homes, once improved and retrofitted, can continue to provide high-quality, adaptable and sustainable homes for decades to come.

2.4.5. Residents remain concerned where social homes leave the sector without sufficient transparency or scrutiny, particularly in high-demand areas, such as London where replacement may be difficult or costly. Where homes are sold or transferred, providers should clearly explain whether they will remain available as social housing and what the implications may be for residents, rents, services, community stability and future housing supply.

2.4.6. Significant social homes sold and transfers should be subject to a **Resident Impact Assessment**. Additionally, the use of the terms 'disposal and stock' should be actively

discouraged as this can lessen the understanding of the emotional reactions residents can have on decisions being made about their home. The Regulator should monitor:

- Trends in disposals.
- The retention of social homes within the sector.
- The long-term impact on housing supply and affordability.
- Resident outcomes following transfers.
- Whether disposals genuinely support future growth, sustainability and resident benefit.
- The extent to which alternatives to disposal were properly considered.

2.5. Going Further to Drive Efficiency and Value

2.5.1. Residents support efficiency where it improves outcomes, strengthens services and delivers better value for both residents and providers. Social housing and its residents should be viewed as essential social and economic infrastructure. G15's report, [*A City That Works for Everyone*](#), estimates that social housing residents contributed **£27.8 billion to London's economy in 2024¹**, with social homes creating around **£20 billion of social value each year²**. The report also found that **almost two-thirds (65%) of employed social housing residents work in key worker occupations³**, supporting hospitals, schools, transport networks and other essential services. This demonstrates that investment in existing and future social homes delivers substantial economic and social returns alongside improved resident outcomes.

2.5.2. Value for money should also be measured solely through financial performance. Housing associations create wider value through:

- Stable homes.
- Stronger communities.
- Improved health and wellbeing.
- Employment and skills opportunities.
- Community investment.
- Resident leadership and influence.

2.5.3. Residents are often well placed to identify inefficiencies, duplication, service failures and opportunities for improvement before these become apparent through formal reporting. Their local knowledge, lived experience and understanding of services operate in practice can provide valuable intelligence for improving services and reducing avoidable costs. The true cost of poor services is often borne by residents through lost earnings, repeated contact inconvenience, stress and reduced confidence in their landlord. Providers should demonstrate how resident insight has been used to improve efficiency, service delivery and organisational costs and resident outcomes, including :

- Effective repairs.
- First-time and quality fix rates.
- appointments.
- Repeat visits.
- Ease of accessing services.

¹ **Executive Summary (p.6-7)** G15 A City that Works for Everyone

² G15 A City that Works for Everyone **(p.23)**

³ G15 A City that Works for Everyone **(p.41)**

- Time taken to complete repairs.
- The impact on residents' time and employment.
- Wider cost-of-living impacts on households.

2.5.4. Contractor performance should form part of value-for-money assessments. Housing associations remain accountable for outsourced services and should demonstrate how they monitor:

- Service quality.
- Resident satisfaction.
- Contractor conduct.
- Compliance with contractual obligations.
- Procurement processes and resident involvement.
- Missed appointments
- Repeat visits
- First-time fix rates
- The overall cost and resident impact of contractor performance

Poor contractor performance can increase costs for both landlords and residents through delays, repeat visits, missed appointments, temporary repairs, complaints and lost earnings. Value for money should therefore consider the quality and effectiveness of outcomes achieved, rather than simply the cost of contracts.

3. Regulating for More and Better Home

Please give your views on our intention to become increasingly targeted in our regulatory approach. In particular, we are keen to hear your thoughts about:

1. **Going further in targeting risk and using data and modelling to enable this**
2. **More active regulation or enhanced requirements for some small and large providers**
3. **Regulating service delivery below landlord level to target localised failure**
4. **Being more assertive to address weaknesses and failure**
5. **Promoting collaborative innovation**

3.1. Going Further: Targeting Risk Through Better Data, Intelligence and Early Intervention

3.1.1. The G15 Residents' Group believes future regulation should move beyond a focus on compliance and place greater emphasis on outcomes, culture, transparency, accountability and resident experience. Greater use of data and intelligence to identify emerging risks is welcomed. However, no single measure provides a complete picture of organisational performance. The most effective regulatory oversight will combine multiple sources of evidence to identify recurring themes, emerging risks and systemic issues at an earlier stage.

3.1.2. **Data Quality, Systems and Modernisation.** Efficient services depend on accurate, up-to-date data and modern systems that reflect how people live today. Poor-quality data and outdated processes can create inefficiencies, increase costs and negatively affect resident experiences. Providers and regulators should promote continuous improvement in data quality, record management and digital systems to ensure they accurately reflect residents, households

and homes. Systems should support modern households and family structures rather than relying on outdated assumptions or administrative hierarchies that no longer reflect everyday life, such as a lead main householder of the tenancy solely contacted.

3.1.3. Poor-quality data, duplicated records and outdated systems and lack of knowledge about residents including protected characteristics can obscure emerging risks, reduce service efficiency and its effect on those with greater needs, hinder accountability and weaken regulatory assurance. Providers and regulators should promote accurate, up-to-date data and systems that reflect modern households and living arrangements. In addition, the Regulator should regard persistent weaknesses in resident data quality and low declaration rates as potential regulator risk.

3.1.4. Core outcome measures, including repairs performance (with a focus on day-to-day and communal compared with emergency repairs), complaints volumes and uphold rates, Tenant Satisfaction Measures, anti-social behaviour, arrears and evictions, should be reported by protected characteristic alongside place-based reporting. Providers should also publish equality declaration rates to provide transparency regarding the completeness and reliability of their data.

3.1.5. The Regulator should consider requiring an annual **Resident Outcomes Gap Statement**, enabling providers to identify, monitor and address disparities in outcomes between different groups of residents over time. This would support greater transparency, accountability and continuous improvement across the sector.

3.1.6. We therefore support a more proactive, curious and intelligence-led approach to regulation that would inform Resident Outcomes Gap Statements. To support this the Regulator should increasingly and rigorously triangulate evidence from:

- Tenant Satisfaction Measures.
- Complaints data and complaints learning.
- Housing Ombudsman findings.
- Resident scrutiny findings.
- Inspection evidence.
- Local service performance data.
- Resident priority needs data
- Resident surveys and independent resident panels.
- Place-based intelligence and lived experience.

3.1.7. Future regulation will be most effective when it combines robust financial oversight with equal attention to resident experience, organisational culture, transparency, accountability and meaningful resident influence on the decisions about their home. Resident evidence should be recognised as a valuable source of regulatory intelligence rather than solely a source of assurance after problems have emerged.

3.1.8. **Preventative measures.** Residents often identify problems before organisational performance data deteriorates and before formal reporting mechanisms highlight concerns. Equally, performance data can sometimes provide an incomplete picture when considered in isolation. The Regulator should therefore place greater weight on resident evidence as an early warning indicator and strengthen the triangulation of regulatory intelligence to provide a more accurate understanding of organisational performance.

3.1.9. Lived experience should be recognised as a core source of regulatory intelligence and an important mechanism for identifying emerging risks.. Earlier identification of concerns can

prevent service failure and harm, enabling providers to intervene before residents are adversely affected. Moving beyond current systems, residents should be recognised as equal partners in maintaining safe, high-quality homes and services. Many residents invest significant time, care and resources in their homes and can play a valuable role in identifying risks, monitoring service quality and supporting accountability. For example, involving residents in the verification and sign-off of completed repairs would provide better quality assurance, strengthen accountability throughout contractor and subcontractor supply chains, and help shift attitudes towards viewing residents as equal partners rather than passive recipients of services. This approach would create richer data, support earlier intervention and encourage more innovative, collaborative approaches to managing risk and improving outcomes.

3.1.10. Intelligence-led regulation should recognise that low complaint levels do not always indicate positive performance. Residents facing language barriers, digital exclusion, discrimination, insecure immigration status or low confidence in their landlord may be less likely to complain or engage through formal channels. The Regulator should therefore treat potential under-reporting as a risk indicator requiring further investigation rather than as evidence of good performance. The Regulator should therefore place greater emphasis on:

- Predictive risk modelling.
- Thematic analysis of complaints.
- Place-based risk indicators.
- Emerging service failures.
- Resident intelligence and lived experience.
- Indicators of potential under-reporting and disengagement.

3.1.11. **Learning from Complaints.** Complaints provide one of the richest sources of organisational learning and should be recognised as a regulatory tool, an early warning indicator and a source of sector-wide improvement. Poor communication, weak accountability, lack of empathy and service failure often emerge through complaints before broader performance measures begin to deteriorate.

3.1.12. The Regulator should analyse and publish common themes arising from complaint self-assessments, Ombudsman findings and improvement plans to support learning across the sector. Providers should demonstrate:

- Root cause analysis.
- Organisational learning.
- Lessons learned and embedded.
- Service improvements implemented.
- Policy or process changes introduced.
- Evidence of sustained improvement and lasting change.

3.2. More Active regulation or enhanced requirements for small and large providers

3.2.1. Residents support proportionate regulation that reflects differing scale and complexity of providers. However, residents of smaller housing associations should not receive a lower standard of regulation, protection or service because of organisational size that lacks resources. Where exemptions, flexibility or tailored approaches exist for smaller providers, the Regulator should ensure that:

- Resident safety is not compromised.

- Consumer standards remain consistent.
- Residents have access to the same routes to accountability.
- Organisational capacity and capability are regularly assessed.

3.2.2. Residents recognise that smaller providers may face resource constraints, particularly in relation to building safety, competence and conduct requirements, transparency and inspections. However, proportionality should focus on how requirements are delivered rather than whether residents receive the same protections. The test should always be whether regulation improves outcomes for residents.

3.2.3. The Regulator should also continue to provide guidance, support and examples of good practice to help providers implement regulatory expectations effectively and encourage local community support from neighbouring housing associations with larger capacity.

3.2.4. Where organisations undertake mergers, acquisitions or large-scale stock transfers, the Regulator should undertake enhanced scrutiny of both the intended benefits and the resident experience. Assessments should consider:

- The stated purpose of the organisational change.
- Service quality during and after transition.
- Resident outcomes.
- Resident influence and communication.
- The impact on business-as-usual services.
- Whether anticipated benefits are achieved in practice.

3.3. Regulating Service Delivery Below Organisational Level to Address Localised Failure.

3.3.1. Residents frequently report that organisational performance can appear strong whilst local experiences tell a different story. Landlord-wide performance measures can mask persistent problems affecting particular neighbourhoods, estates, schemes or groups of residents. The Regulator should therefore consider greater focus on:

- Estate-level performance.
- Neighbourhood outcomes.
- Local service delivery.
- Place-based inspections.
- Geographic concentrations of complaints.
- Recurring localised service failures.

3.3.2. Large organisations should demonstrate performance at neighbourhood, borough and operational area level. Residents have consistently highlighted that organisational averages can conceal significant variations in service quality between communities.

3.3.3. Residents recognise that benchmarking against similar organisations is not always sufficiently stretching or ambitious. National averages can also conceal local issues. The

Regulator should place greater emphasis on understanding local circumstances and variations in performance.

3.3.4. Where local evidence indicates persistent problems, the Regulator should investigate the affected homes, neighbourhoods or services directly rather than relying solely on organisational-level performance data. This should include speaking with residents, reviewing local evidence and explaining its findings and conclusions. Where improvements are required, providers should be expected to produce clear improvement plans setting out what will change, how progress will be measured and how residents will be involved in monitoring delivery and reviewing progress.

3.3.5. Cross -organisational approaches should be encouraged, particularly where housing associations, local authorities and other partners share responsibility for meeting local housing needs and supporting communities.

3.3.6. Residents often experience different levels of access to local services depending on where they live. Signposting and support arrangements should reflect local circumstances and ensure residents can access appropriate services regardless of tenure or landlord arrangements.

3.3.7. **Contractor Accountability.** Many resident experiences are shaped by contractors rather than directly employed staff. Procurement and commissioning arrangements should support quality, resident outcomes and long-term value rather than focusing solely on cost reduction.

3.3.8. Registered Providers must remain fully accountable for all services delivered on their behalf. The regulatory framework should place greater emphasis on:

- Contractor conduct.
- Quality assurance.
- Resident experience.
- Complaints relating to contractors.
- Communication standards.
- Accountability for outsourced services.

3.4. Being More Assertive in Addressing Weaknesses and Failure.

3.4.1. Residents support a more visible and assertive approach where service failures persist. The current regulatory framework provides strong assurance regarding financial viability. Residents would like to see the same confidence and clarity applied to service performance and consumer outcomes. The regulator should be more willing to engage earlier where there is evidence of:

- Persistent service failure.
- Repeated complaints.
- Poor resident outcomes.
- Deteriorating performance.
- Failure to improve following intervention.

3.4.2. Residents consistently raise concerns that a Consumer C1 grading can sometimes be viewed and celebrated as an end point rather than a baseline expectation. Achieving compliance should not become the objective at the expense of delivering excellent services. A C1 judgement should not be interpreted as evidence that every resident receives a good service, that all issues have been resolved or that further improvement is unnecessary. Regulatory compliance represents a minimum standard, not a measure of organisational excellence

3.4.3. The Regulator should seek evidence that providers continue to identify, address and monitor service weaknesses between inspections. This should include demonstrating how outstanding issues are tracked through business plans, improvement programmes and governance arrangements, and ensuring that unresolved concerns are not continually rolled forward without meaningful progress or resolution.

3.4.4. Future regulation should promote a culture of continuous improvement and recognise providers that demonstrate leadership, learning and measurable improvements in resident outcomes beyond minimum compliance. Providers should explain how residents have helped identify priorities for improvement, how those priorities have influenced business plans and service delivery, and publish regular progress updates against agreed actions and outcomes

3.4.5. Meeting the minimum standard should not be regarded as success. Providers should be expected to demonstrate how resident outcomes continue to improve over time and how lessons from complaints, resident feedback, scrutiny and performance monitoring have been translated into sustained service improvements.

3.5. Promoting Collaborative Innovation

3.5.1. Residents support regulation that encourages improvement and innovation, not simply compliance. Innovation should be collaborative and involve residents, landlords, contractors, local authorities, the Housing Ombudsman and wider partners.

3.5.2. The Regulator should play a stronger role in:

- Identifying and sharing effective practice across the sector.
- Promoting innovation that improves resident outcomes.
- Supporting positive organisational and cultural change.
- Encouraging continuous improvement.
- Highlighting effective resident influence models, including strategic resident-led approaches such as the G15 Residents' Group.

3.5.3. **Resident involvement and co-design.** Residents should be recognised not simply as consultees, but as partners in shaping housing policy, regulation and service improvement. The Regulator should actively encourage strategic resident influence models that bring together resident expertise, lived experience and sector knowledge to inform regulatory priorities, inspections and long-term improvement across the sector.

3.5.4. **Equality, Inclusion and Representation.** Regulation should ensure resident engagement reflects the diversity of communities and households. Providers should demonstrate approaches that engage:

- Younger residents.
- Older residents.

- Working households.
- Disabled residents.
- Residents from diverse ethnic communities.
- LGBTQ+ residents.
- Digitally excluded residents.
- Residents across different tenures.

3.5.5. Measuring Success Through Resident Outcomes. Residents ultimately judge organisations by outcomes rather than processes. Success should be measured through improvements in:

- Trust and confidence.
- Quality of communication.
- Repairs services.
- Building safety.
- Complaint resolution.
- Neighbourhood standards.
- ASB resolution and Domestic Abuse support
- Hate crime prevention, reporting and resolution
- Harassment preventions and resident safety
- Effective partnership working
- Resident influence.
- Transparency.
- Resident satisfaction.

3.5.6. The future regulatory framework should place residents at the centre of regulatory assurance, recognising them not simply as beneficiaries of regulation, but as active partners in identifying risk, driving improvement and evaluating success. Residents consistently report that:

- Tenant Satisfaction Measures, complaints and governance ratings are not always considered together.
- Systemic issues may be visible locally but not reflected in regulatory judgements.
- Contractor-delivered services can create accountability gaps.
- Positive compliance reporting does not always align with resident experience.

We look forward to these reforms centring the socially housed resident as an equal partner, free from stigma and empowered to influence the decisions that affect their homes and communities.

The G15 Residents' Group
