

Social Housing Bill – Access for Safety

G15 Residents' Group Response to Proposals on Legal Access for Essential Safety Checks to the House of Lords' Third Reading

Meeting Date: 10 August 2026

Submission Date: 15 August 2026

Overview

The G15 Residents' Group supports the principle that landlords should have an effective, proportionate and standardised legal route to gain access to homes for essential safety inspections, including gas safety checks, electrical safety inspections, and smoke and carbon monoxide alarm checks. This is particularly important within mixed-tenure buildings where equivalent safety obligations already apply to private landlords and leaseholders and where residents are genuinely non-engaging and all reasonable attempts to secure access have been exhausted.

Resident safety must remain paramount. Failure to complete statutory safety checks may place individual households, neighbouring residents, landlords, and entire buildings at risk. We therefore recognise the need for a clear and consistent legal framework that enables landlords to fulfil their legal and safety obligations.

We also recognise that repeated access attempts, legal action and court proceedings can be costly, resource-intensive and time-consuming for both landlords and residents. Public resources should be focused on achieving safe outcomes rather than being consumed by avoidable disputes, poor communication, inaccurate records or ineffective processes. From a resident perspective, value for money is not simply the lowest cost option. It is achieving safe, timely and effective compliance through trusted relationships, accurate information, preventative engagement and proportionate intervention.

However, our discussion highlighted significant concerns that the current proposals are largely framed through a landlord perspective and do not sufficiently reflect the realities of resident experience, the quality and accuracy of landlord and contractor processes, or the complex reasons why access is often not achieved. Residents provided extensive evidence that barriers frequently arise from communication failures, inaccurate data, vulnerability, safeguarding considerations, contractor and sub-contractor performance, or practical life circumstances rather than deliberate refusal to engage.

Members were particularly concerned that the submission focuses heavily on strengthening enforcement powers without giving equal consideration to resident safeguards, landlord accountability, trust, respect and evidential standards.

Since Grenfell, significant regulatory reforms have sought to rebalance the relationship between landlords and residents. The strengthened Consumer Standards, increased regulatory oversight and the development of competence and conduct expectations across the sector reflect a clear policy direction that landlords should be accountable not only for achieving compliance outcomes, but also for how those outcomes are achieved.

Residents are concerned that the current proposals do not adequately reflect this direction of travel. The submission places significant emphasis on the barriers landlords face in obtaining access, whilst giving comparatively limited consideration to the quality of landlord decision-making, contractor performance, record accuracy and the resident experience of enforcement action.

There remains a substantial risk that poorly evidenced "no access" records, contractor and sub-contractor failures, inaccurate data, or assumptions regarding resident behaviour could result in disproportionate enforcement. Without stronger safeguards, the proposals risk reinforcing stigma towards social housing residents and weakening the principles of transparency, accountability, respect and resident engagement that recent reforms have sought to strengthen.

We therefore support the principle of the CIH and MHCLG submission only if stronger resident safeguards, evidence requirements, contractor accountability, communication standards and independent assurance mechanisms are incorporated alongside any extension of landlord powers.

Any legislative change should align with the intent of the Consumer Standards and wider post-Grenfell reforms by strengthening not only compliance, but also trust, fairness, transparency, accountability and resident safety. Legislative reform should not lower expectations of landlord accountability in pursuit of compliance outcomes. Instead, it should ensure that both residents and landlords are held to appropriate standards and that enforcement powers are exercised fairly, proportionately and on the basis of robust evidence.

Key Concerns Raised by Residents

Distinguishing Between "Can't Provide Access" and "Won't Provide Access"

A key concern is the failure to distinguish between:

- Residents who are unwilling to provide access.
- Residents who are unable to provide access.
- Residents who were never given a genuine opportunity to provide access.

These are fundamentally different circumstances and should not be treated in the same way. A resident deliberately refusing access, a vulnerable resident struggling to engage, poor landlord or contractor processes, and a potentially sub-let home each require a different response. Any proposed legal framework should require landlords to establish the underlying reason access has not been achieved before pursuing enforcement powers. This is consistent with a resident-centred, evidence-based approach.

Many examples discussed reflected practical barriers rather than deliberate refusal that are routinely experienced by residents.

Examples included:

- Shift workers unable to attend appointments during contractor hours.
- Hospital appointments and healthcare commitments.
- Caring responsibilities.
- Short-notice appointments.
- Appointment letters arriving late or not arriving at all.
- Residents being away from home.
- Communication only being sent to one named tenant in a joint tenancy.
- Cases where the named resident may no longer be occupying the home, including suspected unlawful sub-letting or unauthorised occupancy.

The G15 Residents' Group also recognises that there are occasions where landlords are unable to gain access because the named resident is no longer living in the home. In such cases, the underlying issue may not be resident non-engagement, but uncertainty regarding occupancy and tenancy status. Where there is reasonable evidence that a property may be unlawfully sub-let or occupied by individuals unknown to the landlord, appropriate tenancy and occupancy investigations should be undertaken before the case is classified as resident refusal or non-engagement. Any legal framework should clearly distinguish between access issues arising from tenancy management concerns and those arising from a resident's failure to engage.

The law should recognise these distinctions and require clear evidence that reasonable opportunities to gain access have been exhausted before enforcement action is pursued.

Vulnerable Residents and Safeguarding

Residents highlighted particular concerns about:

- Mental health conditions.
- Hoarding.
- Learning disabilities.
- Hearing impairments.
- Visual impairments.
- Older residents.
- Digital exclusion.
- Trauma and anxiety relating to unknown visitors.

Many individuals are not refusing access. They require additional support, reassurance and reasonable adjustments.

Several members reported that threatening letters quoting legal powers can increase anxiety and resistance among vulnerable residents, especially where supportive engagement has not first been attempted.

Safeguarding and prevention must therefore remain central to any strengthened legal framework.

Accuracy of "No Access" Data

One of the strongest themes emerging from the discussion was concern regarding the accuracy of landlord and contractor data.

Residents shared multiple examples, including but not limited to:

- Contractors arrived with little or no notice.
- Appointments were changed without agreement.
- Contractors failed to attend.
- Contractors attended at inappropriate times.
- Contractors recorded "no access" despite residents attempting to rearrange appointments.
- Contractors left before vulnerable residents could reach the door.
- Cancellations were incorrectly recorded against residents.
- Contractors provided with inaccurate resident information/
- Contractors not informed of residents' accessibility requirements and support needs.

Several members felt that contractor performance indicators can unintentionally incentivise visit completion statistics rather than accurate reporting.

Should Landlords have accurate data they would be better advised on prioritising the need for checks.

As a result, residents expressed concern that courts may be asked to rely on records that do not always accurately reflect what occurred.

The Group therefore recommends that a "no access" record should only be accepted where landlords can provide robust evidence demonstrating:

- Proper notice was given.
- Multiple contact methods were used.
- Appointment options were reasonable.
- A genuine access attempt occurred.
- The failure was attributable to resident non-engagement rather than landlord or contractor failure.

Contractor & Sub-contractor Accountability

A recurring theme was the gap between landlord policies and residents' lived experience.

While landlords may have good procedures on paper, residents frequently reported inconsistent contractor practices.

Examples raised included, but were not limited to:

- Operatives failing to wait for elderly or mobility-impaired residents to answer the door.
- Appointments arranged only during standard working hours.
- Contractors failing to provide advance calls.
- Missed visits being recorded as resident failures.
- Limited flexibility for residents working shifts.

I would incorporate your point as a specific paragraph after the accountability section. I've tightened the language while keeping the resident perspective and highlighting the governance concern.

Residents emphasised that accountability should apply throughout the entire delivery chain. Landlords should remain responsible for ensuring that contractors and sub-contractors meet the same standards of communication, professionalism, safeguarding awareness, equality obligations, record keeping and evidence collection. Residents should not be disadvantaged where failures arise from contracted service providers acting on behalf of landlords.

Members also raised concerns regarding the accuracy and oversight of contractor-held appointment and access data. Residents reported instances where initial boiler servicing and safety check appointments were overbooked, resulting in appointments not being attended despite residents being available and expecting a visit. In some cases, these failed visits were subsequently reflected within "no access" reporting, potentially distorting the true reason why a safety check had not been completed.

Residents further highlight that the management and re-booking of appointments is often undertaken directly by contractors or sub-contractors, with limited visibility or oversight by the landlord. While landlords remain responsible for compliance and are held accountable by regulators for meeting their statutory obligations, they may not become aware of operational failures, inaccurate records or repeated appointment issues until a resident raises a complaint. This creates a risk that enforcement decisions could be based on incomplete or inaccurate information.

The Group therefore believes that any strengthening of landlord powers must be matched by stronger requirements for contractor and sub-contractor accountability, transparent record keeping, robust audit trails and landlord oversight of access data. Accurate identification of the reason a safety check has not been completed is essential before any resident is classified as non-engaging or enforcement action is considered.

Trust, Culture and the Risk of Reinforcing Stigma

The Group was concerned that the submission does not fully consider the wider cultural implications of strengthening landlord powers without equivalent safeguards for residents.

In practice, "no access" cases can quickly create assumptions that residents are being uncooperative, obstructive or deliberately non-compliant. Our experience suggests that the reality is often far more complex. Missed appointments, poor communication, vulnerability, fear, previous poor experiences, language barriers, disability, employment commitments, safeguarding concerns and inaccurate records, or data used/provided, are frequently contributing factors.

There is a risk that stronger powers, without robust evidential requirements, unintentionally reinforce existing stigma associated with social housing residents. The evidence presented in support of these proposals appears heavily weighted towards landlord perspectives, while resident perspectives and lived experiences are comparatively underrepresented. This risks creating a narrative in which residents become viewed primarily as a barrier to compliance rather than individuals with legitimate reasons, concerns and rights.

Residents also highlighted that granting access to a person's home is fundamentally different from access to a commercial building or public space. Entry into a home exposes highly personal aspects of an individual's life, including their religion, disability, ethnicity, health conditions, family circumstances, sexual orientation, gender identity and other protected characteristics. Residents may also reveal evidence of domestic abuse, safeguarding concerns, mental health challenges, financial hardship, caring responsibilities or other highly sensitive circumstances.

For many individuals, particularly those who have experienced discrimination, prejudice, trauma or institutional mistrust, allowing unknown individuals into their home can be a deeply significant event. The submission does not sufficiently recognise the power imbalance that exists in these situations or the potential for conscious or unconscious bias to affect residents' experiences.

At best, poor practice can lead to residents feeling disrespected, unheard or stereotyped. At worst, it can expose residents to discrimination, hostility, intimidation, unsafe interactions or poor-quality service delivery. Stronger legal powers should therefore be accompanied by equally strong requirements around professionalism, equality, safeguarding, accountability and resident dignity.

The Group believes the proposals place significant emphasis on compliance whilst giving insufficient consideration to the principles that underpin the Consumer Standards, including accountability, transparency, fairness, respect and meaningful resident engagement. The reforms introduced following Grenfell sought to ensure that landlords are held accountable not only for service outcomes but also for the quality of their decision-making, communications and interactions with residents. Any legislation that strengthens landlord powers should be considered within this wider regulatory context and should not inadvertently weaken those expectations.

Through our engagement with MHCLG, the Regulator of Social Housing and housing providers, there has been consistent recognition that a more resident-centred culture is required across the sector. Residents should be treated as partners in achieving safe homes, not as obstacles to compliance. Any legislative reform should reinforce this shift in culture rather than inadvertently reversing it.

The Group therefore recommends that any strengthening of landlord access rights is accompanied by:

- Stronger requirements around resident dignity, trust and respect.
- Mandatory consideration of equality, diversity and safeguarding implications.
- Evidence that reasonable adjustments have been offered where required.
- Greater scrutiny of landlord and contractor behaviour, not solely resident behaviour.
- Independent assurance that landlord records and "no access" classifications are accurate.

- Clear recognition that resident engagement, trust and prevention should be exhausted before enforcement measures are pursued.
- Clear, accessible and timely explanations provided to residents regarding the purpose of visits, the associated safety requirements, and the consequences of access not being achieved.
- Evidence that landlord, contractor and sub-contractor obligations have been fully discharged before enforcement action is considered.

The objective should not simply be to secure access. The objective should be to secure access through processes that are fair, inclusive, evidence-based and consistent with the resident-centred culture that the sector is seeking to build.

Proportionality and Evidence Requirements

The proposal seeks to address a relatively small number of genuinely non-compliant cases.

Residents were concerned that increased enforcement powers could disproportionately affect compliant residents where poor processes, inaccurate records or communication failures exist.

Before forced entry powers are granted, landlords should demonstrate:

- Multiple documented contact attempts.
- Reasonable appointment flexibility.
- Consideration of vulnerabilities and support needs.
- Safeguarding checks where appropriate.
- Clear evidence that no-access records are accurate.
- Senior review of evidence before court applications.
- Independent assessment where concerns exist regarding vulnerability.

Learning from Grenfell and Awaab's Law

Residents were clear that the lessons arising from Grenfell and the introduction of Awaab's Law were not solely about technical compliance. They were also about listening to residents, responding to concerns at an early stage, challenging assumptions, and understanding the reality of people's lived experiences. As social housing residents, these lessons are not theoretical. They directly affect our homes, our safety, and our confidence that concerns raised by residents will be heard and acted upon.

Any legislative change must therefore be resident-focused as well as safety-focused.

The Group believes the same principles that underpin Awaab's Law should apply here:

- Early intervention.
- Clear accountability.
- Robust evidence.
- Resident-centred decision-making.
- Independent assurance.

Recommendations

The G15 Residents' Group supports the principle of strengthening legal access powers for essential safety checks, subject to the following safeguards:

1. Clear distinction between residents unwilling to provide access and residents unable to provide access.
2. Mandatory consideration of vulnerability, disability and safeguarding needs.
3. Stronger evidence requirements before court action.
4. Independent oversight of no-access recording and contractor performance.
5. Greater appointment flexibility, including evenings and weekends where practical.
6. Improved communication standards and multi-channel contact requirements.
7. Mandatory consideration of reasonable adjustments under equality legislation.
8. Stronger regulatory scrutiny of no-access data and landlord evidence.
9. Clear resident rights of challenge where records are inaccurate.
10. Safeguards to ensure legal powers remain proportionate and focused only on genuine non-engagement.
11. Landlords should demonstrate that contractor and sub-contractor obligations have been fulfilled before legal enforcement powers are pursued.
12. Residents should receive clear and accessible information explaining the purpose of safety visits, the evidence relied upon in no-access cases, and the steps available to challenge inaccurate records.

Conclusion

The G15 Residents' Group agrees that essential safety inspections must be completed and that landlords require an effective legal route where residents persistently fail to engage.

However, the Group believes the current proposals are disproportionately framed around the challenges faced by landlords and do not sufficiently reflect the resident perspective, the realities of frontline service delivery, or the lessons learned through post-Grenfell reform.

Residents support proportionate enforcement where genuine non-engagement can be evidenced. However, enforcement powers must not become a substitute for good communication, accurate record keeping, effective contractor management, resident engagement, safeguarding or accountability.

If Parliament proceeds with legislative change, it should ensure that resident rights, safeguarding considerations, accessibility requirements, equality obligations, landlord accountability and robust evidential standards are strengthened alongside any extension of landlord powers. Reform should support the objectives of the **Consumer Standards** by reinforcing transparency, trust, respect and accountability across the landlord-resident relationship.

The objective should not simply be to make it easier to gain access to homes. The objective should be to create a framework that achieves safe homes through fair, proportionate, evidence-based and resident-centred practice. Only then can any extension of landlord powers be regarded as justified, balanced and consistent with the direction of travel established since Grenfell.

The G15 Residents' Group