



G15 Residents' Group
THE STRATEGIC VOICE IN SOCIAL HOUSING

NHF EDI Leadership Challenge submission

G15 Residents' Group Response

16/07/2026

Our response is informed by:

- Lived experience across all members of the G15RG across all tenure types, including Leaseholders and Shared Owners with representation from diverse demographics.
- Experience of strategic and decision-making level of involvement across all members of the G15RG.
- Experience of Resident Leadership across all members of the G15RG.

About the G15 Residents' Group

The G15 Residents' Group (G15 RG) represents 1 in 10 London residents living in the 880,000 homes owned and managed by London's largest housing associations. Our members bring direct experience of the social housing sector and lived experience as residents. This response draws on that lived experience, practical insight, and ongoing dialogue with our landlords and the wider sector.

Our focus is to ensure that resident voices are embedded in future policy development, resident influence on decisions and governance, so that lived experience informs and shapes meaningful reform.

G15 Resident Group Response

Overall, how well do you feel the Code of Conduct achieves its purpose?

The G15 Residents Group welcomes the intention behind the revised Code of Conduct and recognises the important role that codes of conduct can play in establishing expectations around behaviour, professionalism, integrity and accountability within housing associations.

However, we do not believe the draft Code goes far enough in recognising the unique relationship between housing associations and the residents they serve.

Whilst the Code sets out standards of behaviour expected of individuals involved in the work and decision-making of housing associations, it places insufficient emphasis on accountability to residents, resident influence and the behaviours required to create a genuinely resident-centred culture.

The social housing sector continues to face significant challenges relating to trust, transparency and resident confidence. Following the Grenfell Tower tragedy, government, regulators and sector leaders recognised the need to address social housing stigma and strengthen relationships between residents and landlords. Whilst progress has been made, many residents continue to report feeling unheard, dismissed, judged or stigmatised.

The G15 Residents Group believes the NHF has a significant opportunity to use this Code to drive meaningful cultural change across the sector. To achieve this, the Code should move beyond a traditional governance framework and establish a clear expectation that everyone subject to the Code is accountable to residents and has a responsibility to support a culture of respect, partnership, openness, learning and continuous improvement.

A resident-focused Code of Conduct has the potential to become one of the most important tools available to housing associations in tackling stigma, strengthening accountability and embedding the principles of the Consumer Standards. We therefore encourage the NHF to take a bold approach that places residents at the heart of the Code and clearly articulates the behaviours that residents should reasonably expect from those who hold positions of responsibility within housing associations.

Reading the revised introduction to the Code, please tell us about anything you think is missing or needs better explanation.

The introduction should make it clearer that the development, adoption and review of Codes of Conduct is now directly linked to the expectations of the Consumer Standards and the requirement for meaningful resident influence.

The current wording states that residents should have opportunities to influence decisions relating to the Code. However, it does not clearly communicate that resident consultation is now an expectation of good governance and regulatory compliance.

The introduction should also set out more explicitly that the purpose of the Code is not solely to regulate behaviour between colleagues, board members and contractors, but also to define how those individuals should behave towards residents.

The Code should recognise that residents are not simply another stakeholder group. Housing associations exist to provide homes and services to residents and therefore accountability to residents should be a central principle throughout the document.

There is also reference to the Code applying to certain contractors. Many landlords already have separate behavioural standards for contractors and repairs operatives who regularly enter residents' homes. The Code should recognise that these individuals often have the most direct interaction with residents and that additional behavioural expectations may be required to ensure respectful, professional and resident-focused conduct.

Does the jargon-buster section cover what it needs to, and in plain enough English?

The G15 Residents Group strongly believes that the entire Code should be written in a way that is accessible and understandable to residents.

If residents are expected to help shape, scrutinise and hold organisations accountable to the Code, they must be able to understand it without requiring specialist knowledge of governance or housing terminology.

At a minimum, we believe further explanation should be provided for terms such as:

- Strategic objectives
- Desired culture
- Protected characteristics
- Corporate responsibility
- Collective decision-making
- Professionalism
- Co-production, co-design, co-creation

The definitions of staff and contractors should also specifically reference directly employed repairs operatives, recognising the important role they play in shaping residents' day-to-day experiences of their landlord.

Taken together, do the five headings for each part of the Code capture the most important aspects of individual conduct?

No.

The most significant omission from the Code is a clear and explicit principle of **Accountability to Residents**.

The G15 Residents Group believes this should be a standalone section within the Code and positioned prominently alongside integrity, responsibility and professionalism.

Residents are not simply one stakeholder amongst many. They are the primary stakeholders of every housing association and the reason those organisations exist.

The Code should therefore establish a clear expectation that all individuals subject to it recognise their responsibility to residents and understand the impact that their attitudes, behaviours and decisions have on residents' lives.

Without a dedicated focus on accountability to residents, the Code risks being perceived primarily as an internal governance document rather than a tool for cultural change.

Proposed New Principle: Accountability to Residents

The G15 Residents Group recommends that the Code includes a dedicated section requiring all individuals subject to the Code to:

- Build trusting and respectful relationships with residents.
- Recognise and actively address power imbalances between landlords and residents.
- Treat residents as partners rather than passive recipients of services.
- Recognise lived experience as a valuable form of expertise.
- Support a culture of fairness, respect, compassion, empathy and openness.
- Avoid patronising, dismissive or stigmatising attitudes and behaviours.
- Understand and apply trauma-informed approaches when engaging with residents.
- Promote honesty and transparency in decision-making.
- Ensure residents have access to the information they need to participate meaningfully.
- Respect residents' knowledge of their homes, communities and lived experiences.
- Welcome resident scrutiny as an opportunity for learning and improvement.
- Demonstrate clearly how resident feedback has influenced decisions and outcomes.
- Create safe routes for residents to raise concerns about behaviour that may breach the Code.
- Ensure residents can challenge decisions or behaviours without fear of being labelled difficult, troublesome or unreasonable.

Part 3 – Treating Others Fairly, With Respect and Empathy

If the NHF chooses not to introduce a dedicated Accountability to Residents section, then the principles outlined above should be incorporated throughout Part 3.

The section should make explicit reference to working with residents and should clearly set out the standards of behaviour expected when engaging with residents.

The language should go beyond respect and fairness and include expectations around listening, partnership working, transparency, empathy, trust and accountability.

Part 4 – Taking Responsibility for the Impact of Your Actions

This section should place greater emphasis on creating a culture of ownership and accountability.

Residents frequently report frustration when issues are passed between teams, responsibilities are unclear or commitments are not followed through.

The Code should therefore establish an expectation that individuals take ownership of issues, concerns, complaints and actions arising from interactions with residents.

The wording should reinforce that responsibility includes ensuring that issues are progressed, monitored and resolved rather than simply referred elsewhere.

We also question why some provisions refer specifically to involved tenants rather than all residents and service users. Consistent terminology should be used throughout the Code.

Part 5 – Acting with Diligence and Care

The G15 Residents Group believes this section should include additional expectations relating to:

- Tackling social housing stigma.
- Participation in training on resident experience, stigma and culture.
- Challenging stigmatising attitudes and behaviours when they occur.
- Responding positively to resident scrutiny and challenge.
- Promoting continuous learning from resident feedback.
- Encouraging residents to raise concerns and complaints.
- Creating an environment where residents feel listened to and believed.

The Code should also make clear that individuals should seek to trust residents unless there is evidence not to do so. Resident concerns should never be dismissed or minimised.

Individuals should avoid making assumptions about residents' lifestyles, circumstances, capabilities or motivations and should recognise the value of residents' time, expertise and contributions.

Additional Comments

The G15 Residents Group believes the Code should recognise the growing role of resident leadership across the social housing sector.

Residents are increasingly contributing to governance, strategy, service design, scrutiny, regulatory discussions and national policy development. The Code should acknowledge lived experience as a legitimate form of expertise and establish expectations that those subject to the Code engage constructively and respectfully with resident leaders.

The Code should also ensure that residents involved in scrutiny, engagement or consultation activities retain the independence necessary to provide challenge. Residents should not feel restricted from participating in wider sector initiatives, campaigns, research or policy discussions because of their involvement with their landlord.

Ultimately, the Code presents an opportunity to do more than establish standards of conduct. It can help shape the culture of the social housing sector for years to come. By placing accountability to residents at its heart, the NHF can create a Code that strengthens trust, tackles stigma, promotes partnership working and supports the culture change that residents, landlords, regulators and government all wish to see.

The G15 Residents' Group

Evidence of Impact in the final NHF Code of Conduct - published July 2026

The G15 Residents' Group played a significant role in the NHF Code of Conduct review through both a detailed written submission and representation on the Advisory Panel via the Chair of the G15 Residents' Group. While not all recommendations were adopted in their original form, the review response demonstrates clear influence on the strengthened resident focus within the revised Code, particularly in relation to accountability, resident influence, scrutiny, tackling stigma, accessibility, transparency and respectful behaviours.

This evidence is derived from the final document and correspondence from the NHF Head of Policy and Compliance, Paul Baley

G15 Residents' Group feedback theme	Included in revised Code?	Demonstrated impact on final Code
Accountability to residents as a core principle	Partly	While a standalone "Accountability to Residents" section was not created, accountability to residents was strengthened throughout the Code. The review response notes that resident accountability was embedded across multiple sections rather than confined to one area, making clear that consideration of residents is everyone's responsibility.
Resident influence, scrutiny and feedback loops	Yes	Expectations around how the Code is developed, adopted and monitored were strengthened. The revised Code includes clearer requirements for meaningful resident influence and opportunities for residents to scrutinise implementation.
Stronger resident-centred culture	Yes	The Code was revised to further centre residents throughout, reinforcing the need to consider the impact of decisions and behaviours on residents and emphasising fairness, respect, empathy and meaningful engagement.
Tackling stigma and respectful behaviours	Partly	Following feedback, the Code now explicitly references challenging language and behaviours that perpetuate stigma about social housing. Additional wording was included regarding

G15 Residents' Group feedback theme	Included in revised Code?	Demonstrated impact on final Code
		patronising behaviour and discriminatory attitudes.
Safe challenge and reporting concerns	Yes	The revised Code includes clearer expectations regarding reporting routes where breaches occur and supports a culture where concerns can be raised appropriately. This reflected G15RG calls for safe mechanisms for challenge and accountability.
Recognition of resident expertise and scrutiny	Partly	Although not explicitly framed around resident leadership, the revised Code strengthens references to resident influence, scrutiny and engagement, recognising the value of resident involvement in governance and decision-making.
Accessibility and plain English	Yes	A further Plain English review was undertaken. The jargon buster was reviewed and expanded, supporting G15RG recommendations that the Code should be accessible to residents involved in shaping and scrutinising it.
Scope and inclusion of contractors and operatives	Yes	The revised Code clarifies that it applies to contractors, specifically adding grounds and other operatives alongside repairs contractors, reflecting feedback about those working directly in residents' homes and communities.
Independence of residents involved in governance and scrutiny	Yes	The Code was amended so expectations regarding political or campaigning activity apply only to Board and staff members. This helps ensure involved residents retain independence to participate in wider sector discussions and activities.
Consistent use of resident terminology	Yes	Terminology was amended to use "resident" consistently, with supporting explanation in the jargon buster.

G15 Residents' Group involvement

Contribution	Impact
Formal written submission from the G15 Residents' Group, representing residents from London's largest housing associations and drawing on lived experience, resident leadership, governance and scrutiny expertise.	The submission helped shape key themes identified in the review response, including accountability to residents, resident influence, transparency, tackling stigma, accessibility, contractor conduct, safe challenge and scrutiny.
Chair of the G15 Residents' Group serving on the NHF Code of Conduct Advisory Panel.	Ensured resident perspectives were represented throughout the review process, influencing discussion, challenge and refinement of the Code and supporting the strengthened focus on residents within the final draft.