

Joint NHF and CIH action plan in response to the Better Social Housing Review

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Chartered
Institute of
Housing

**NATIONAL
HOUSING
FEDERATION**

Foreword



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Background

In June 2022, the National Housing Federation (NHF) and Chartered Institute of Housing (CIH) commissioned an independent panel, called the Better Social Housing Review (BSHR), to look into issues of poor quality in social housing and to develop some actionable recommendations for social housing providers. Led by our members, we wanted to understand what more housing associations could do to improve the quality of homes and the experience of residents.

Government data shows that housing association homes are in a better condition than other tenures and the vast majority are in a good condition. However, there are homes that are in a poor condition.

In addition, evidence shows that structural inequalities in our society mean that across all types of housing

Black, Asian, Minority Ethnic or disabled people are more likely to live in these poor quality homes. For instance, Black and Asian households are around three times more likely to live in damp homes than their white British counterparts.

In December, the independent BSHR panel published their findings and seven recommendations for social housing providers. Structural inequalities and the experiences of Black, Asian and Minority Ethnic people were at the core of all their findings and recommendations.

“All our recommendations have been inspired or informed by examples of good practice we have seen from housing associations, staff and tenants.”

BSHR panel

An action plan for real change

This document is an action plan which sets out what the NHF and CIH will do to work alongside housing associations to deliver on the BSHR panel's recommendations. It is an evolving document, which will develop and grow as the NHF, CIH and our members implement, learn and build on the actions.

We believe the action plan that follows has the potential to support real change within the sector. By working together, sharing best practice and collaborating we will demonstrate two things. First, the sector's commitment to good quality homes and services. Second, the active steps housing associations are taking to overcome the structural inequalities in our society that mean people of all backgrounds may not currently get equal access to these good homes and services.

We hope it will complement all the work housing associations are already doing to improve their existing homes and customer service. With increased investment of 20% in existing homes from 2020/21 to 2021/22, many housing associations are redesigning their repairs and maintenance procedures – bringing forward stock condition surveys, aiming to cover as many homes as possible in one year, revisiting homes with historical damp and mould concerns and writing to all residents to support and encourage them to report problems. In addition, since 2020 hundreds of housing associations have signed up to the new NHF Code of

Governance that places an increased importance on the diversity of staff and being accountable to residents.

Government support is needed for a housing system under pressure

Importantly, our aim with this action plan is also that it will drive broader systemic change such as increased funding and changes to government policy to support regeneration.

The BSHR panel were clear about the current context for social housing providers, concluding that “the sector faces many external pressures.”

In 2010, the government cut capital investment in funding for new homes by 63% in real terms. The Lyons Review said this was the biggest cut to any government capital budget. The NHF and CIH campaigned against these cuts and highlighted the risks of under investment.

The impact is starting to show. The UK's homes are the oldest in Western Europe and are poorly insulated. Housing associations are having to rely on outdated stock that can be difficult or impossible to repair.

“We recognise that the context in which housing associations are operating is challenging”

BSHR panel

The condition of our country's homes is under additional strain because it is in such short supply. In England 4.2 million people are waiting in need of social housing, and 310,000 children are forced to share a bed with other family members because of overcrowding. Ethnic minority households are more than three times as likely to experience overcrowding than their white British counterparts, and around one million people with disabilities are currently living in homes that aren't accessible for them.

Housing associations are still working to meet the urgent demand to build more homes. However, there is now a real risk of a reduction in housing associations' ability to build new social homes given the number of pressures they are currently facing. In addition to funding cuts, building new homes and making the necessary increased investment in existing homes, housing associations also need to spend increasing amounts of money on meeting important new standards around building safety and decarbonising homes.

“Social housing is a system under pressure”

BSHR panel

In addition to this, we are in the midst of a cost-of-living crisis. Poverty rates across the country are worsening and are found to be highest among social renters. This has left many residents unable to afford to heat their homes, compounding problems of damp and mould. Because of structural societal inequalities and the institutional racism that exists around us, these residents are more likely to be Black, Asian, Minority Ethnic or disabled.

Despite these challenges, the NHF, CIH and our members will do everything we can to improve our homes and services. Over the last five years housing associations have spent nearly £88bn on repairs and maintenance of existing homes and building new homes. But there is only so much housing associations can do by themselves.

We could not agree more with the panel's conclusion that social housing is a 'system under pressure'. We are acutely aware that our ability to improve the condition of our homes is constrained by all of these challenges and pressures.

The way forward: funding, long-term policy and action on regeneration

The NHF, CIH and our members have supported the government's programme of reform as set out in the Social Housing White Paper, including the revised approach to consumer regulation.

The Social Housing Regulation Bill will reform the regulation of social housing and its consumer standards.

The government recently announced plans for new qualifications for social housing managers and has introduced unlimited fines for landlords failing residents.

But these actions will not address the fundamental problem that much of England's social housing is old, poorly insulated and deteriorating.

As a sector we want to work in partnership with the government to create ways to fund the regeneration and renovation of this country's social housing stock. In order to do this, we need government support to urgently fund the building of new social homes, which ultimately will be built to a better quality, with better insulation, than those of the last 50 years.

The BSHR panel said that central government must recognise that it remains fully accountable for the provision of decent housing nationally and it must act on that responsibility as it already does in relation to health and education.

Along with the BSHR panel, we support the call from the Levelling Up, Housing and Communities' Select Committee for the government to "introduce funding specifically for regeneration and to deliver on its commitment to increase the supply of homes for social rent". Recent changes from Homes England to prioritise social rent through social rent-specific grant rates in its Affordable Homes Programme are a welcome first step.

As a sector we will play our part as we take the recommendations of the BSHR panel forward. We look to our partners in the government to support this work with funding, long-term policy and action on regeneration.

“The revolving door of housing ministers has meant that there has been a lack of consistent and strategic thinking and action at a government level around housing. Funding taps have been turned on and off with minimal notice and successive governments have not invested enough in providing funding for critical areas such as regeneration.”

BSHR panel

Thank you

We are grateful to the Steering Group of housing association leaders, in particular to Ian McDermott from Peabody and Charlie Norman from Mosscare St Vincent's, who have chaired the group.

We are grateful to the Working Group on Race and Structural Inequalities in the BSHR and in particular to Tracey Gore from the Steve Biko Housing Association who chaired this group.

We also appreciate the contributions from NHF and CIH members, the NHF Tenant Advisory Panel, the BME London Landlords resident group and the Liverpool City Region BME resident group and thank them for consulting with us on this action plan.

Finally, we want to thank the BSHR panel and the hundreds of housing association staff, residents and others who spoke to them.

Endorsements

The following groups of housing associations have endorsed this plan:

- The Quality and Trust Steering Group
- The Working Group on Race and Structural Inequalities in the BSHR
- The Board of Placeshapers
- G15
- Homes for the North
- Build East
- BME National
- BME London Landlords
- Homes for the South West
- Greater Manchester Housing Partnership

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Introduction

Background

Over the last few years media reports have highlighted cases of poor-quality housing. Daniel Hewitt’s investigation for ITV and Kwajo Tweneboa’s social media campaign have exposed homes with a wide range of issues relating to damp, mould, leaks, inadequate ventilation, pests, overcrowding and more. Structural inequalities in our society mean that [Black, Asian and Minority Ethnic people are more likely to live in homes with damp problems than their white British counterparts.](#)

Government figures show that housing association homes are generally of good quality and housing associations provide good services. But clearly issues of poor quality and inequitable service provision exist. The National Housing Federation (NHF), Chartered Institute of Housing (CIH) and our members wanted to understand what was going wrong. The NHF and CIH commissioned an independent panel – the [Better Social Housing Review \(BSHR\)](#) – in June 2022 to understand this. The panel consisted of five volunteers with a range of professional and lived social housing experiences. In December 2022 this independent panel set out seven recommendations for social housing providers to improve the quality of their homes and complaints handling services with residents at the centre. The recommendations were all based on examples of good practice carried out by housing associations.

This document is the NHF and CIH’s response to the BSHR’s report. It is an action plan which sets out how the NHF and CIH will support housing associations to deliver on the recommendations. The actions in this plan are long term and will evolve over time as we better understand their impact and react to new knowledge and external factors.

Structural inequalities, and in particular race, were a core theme throughout the BSHR’s report. They found that “many tenants face structural inequalities, especially people from Black and Minority Ethnic communities, those with disabilities and single parent households”. Serious concerns were raised with the panel about the systemic disadvantage still being faced by Black and Minority Ethnic communities in particular.

Racial inequalities exist throughout our society, embedded within structures and systems and reinforced by ongoing discriminatory practices. With poverty on the rise, seven in ten families are going without essentials, and [JRF’s UK Poverty 2023 report](#) found that people from ethnic minorities have higher in-work poverty and higher child poverty rates than their white British counterparts.

The report also found that poverty rates for Bangladeshi and Pakistani ethnic groups are higher than for other Asian ethnic groups at 51% and 44%, while two in five people from Black ethnic groups (42%) are in poverty, more than double that of white ethnic groups.

Studies also show us that Roma, Gypsy and Traveller communities are especially vulnerable to high levels of racial assault, precarious employment and socioeconomic deprivation, in turn impacting the likelihood that they live in poor quality housing.

The 2021 census revealed that almost half (44%) of Black people in England and Wales live in social housing, almost three times more than their white counterparts. At 27%, Black Britons reported the highest rates of overcrowding compared to all other ethnic groups, Bangladeshi Britons are the most likely Asian ethnic group to live in overcrowded households, significantly higher than the average of all British Asians, 23% of whom reported living in overcrowded housing.

The NHF and CIH are committed to addressing structural barriers and to driving forward a culture of inclusivity.

The BSHR encourages us to focus on making sure that racial inequality lessens in social housing, and that ultimately a person's race is not a contributing factor in whether they experience poor quality housing. We will support housing associations in their endeavours to become anti-racist organisations, positively promoting race equality, not merely avoiding discrimination.

BME National, a collective of housing associations who work in racially diverse neighbourhoods, have stated; "we know that housing associations are each on their own journey to tackle inequality and BME National are committed to working with the wider sector to execute the BSHR action plan."

We also know that people with physical or mental disabilities may face additional barriers when trying to get complaints resolved. And we know that people with disabilities are more likely to live in social housing than any other kind of housing, with almost a third (27%) of households with a disabled adult living in social housing. This provides yet another reason why it is so important for social housing providers to get customer service and the quality of homes right.

This is a document for our members, as well as for residents and tenants of housing associations, decision makers and officials who want to know what action the NHF, CIH and our members are taking to improve the quality of our homes and services.

Working with our partners across social housing

While the BSHR was focused on recommendations to housing associations, we know that local authority landlords are equally committed to delivering the best quality homes and services for their residents.

Therefore, we have agreed to work closely alongside the Local Government Association (LGA), the Association of Retained Council Housing (ARCH) and the National Federation of ALMOs (NFA) to ensure that wherever possible our actions will be relevant to all social landlords – both housing associations and local authorities with and without ALMOs.

- The LGA, NFA, and ARCH will work with their members together on the local authority work in this area, with regular interaction between them and the work the NHF and CIH are leading on.
- We will make publications, webinars, tools and learning opportunities delivered through this work available to both housing associations and local authorities wherever possible.
- We will work closely together to ensure that the work in response to recommendation two, which proposed an audit of social homes, supports both housing associations and local authority landlords to better understand the condition of their homes, including through local authority representation on our task and finish group.
- We will ensure that the best practice in repairs and maintenance group, established in response to recommendation three, includes representation from local authority landlords as far as possible, and we will collaborate closely with local authority partners to ensure that the work of the group is relevant for, and shared appropriately with, the social housing sector as a whole.

How we developed the action plan

This action plan has been developed by staff at the NHF and CIH in close collaboration with our members. The work was led by two key groups of senior housing association leaders:

- A steering group made up of housing association chief executives and one chair whose role has been to guide, challenge and support this work.
- A working group on structural inequalities, race and the BSHR. Given the prominence of race and ethnicity related concerns highlighted by the BSHR, the task of the working group has been to understand how the BSHR recommendations interact with structural inequalities and racism to ensure our action plan faces the inequalities head on. Their scope has been dictated by the details of the BSHR, and as such this action plan takes active steps to ensure that someone's race or ethnicity does not make it more likely that they live in poor quality social housing.

We have focused on race and ethnicity above other protected characteristics because the BSHR clearly defines the need for housing associations to address racial inequality. The working group had structural inequality and intersectionality at the forefront of their minds throughout the development of this action plan.

In addition to these two key groups, we worked closely with groups of asset directors – for example the NHF Quality of Existing Homes Group and the CIH Assets and Repairs Group – and we consulted a wide range of representative groups covering every type and size of housing association member.

Language

Throughout this document we refer to Black, Asian and Minority Ethnic people to cover the broad range of inequalities experienced by all groups minoritised by their race or ethnicity. Despite using this language, we know that the problem is far more nuanced and that people from some ethnicities are more likely to experience damp problems in their home than others, in particular people who are Bangladeshi, Pakistani, Black African, Black Caribbean and Black other.

Cultural sensitivity and cultural inclusivity are used as phrases throughout this document. By this, we are referring to understanding, respect and consideration being given to a person's race, religion, and religious associated practices.

In summary: **BSHR's seven** **recommendations** **and our action plan**

1

Every housing association, and the sector as a whole, should refocus on their core purpose and deliver against it.

Organisation leading on this work: NHF

The BSHR panel found that housing associations are operating within an increasingly complex and demanding environment.

Societal pressures, and a shortage of new housing, mean residents are more likely to have complex needs, such as experience of homelessness, health issues or substance misuse, than a few decades ago. In addition, Black, Asian and Minority Ethnic and disabled people are more likely to need access to social housing than their white British or non-disabled counterparts.

The BSHR panel recommend that within this environment housing associations refocus on getting the basics right for all and delivering their core purpose. The panel suggested that the core purpose of the sector is “to provide decent, safe homes for those who can’t afford the market”.

This is consistent with the role and purpose of the sector set out in [the NHF’s 2022 Strategic Review](#) and we will continue to promote this core purpose in all our work.

We will also:

- Ensure that all housing associations see the need for equality, diversity and inclusion as a strategic priority. As they reflect on their core purpose, the NHF and CIH will encourage housing associations to consider societal inequalities that exist within the local communities where they have homes.
- Use existing measures to track progress on improving the quality of social housing and of services delivered to residents at a national level. We want to champion the good work that we know housing associations are doing.
- Continue promoting the NHF 2020 Code of Governance as a tool which can be used to improve transparency, demonstrate accountability and increase trust.
- Organise a series of events and share resources which will support and challenge housing associations to reflect on their core purpose and organisational culture. In particular, we will encourage housing associations to consider how they meet the diverse needs of Black, Asian, Minority Ethnic and disabled residents. We know that because of structural inequalities in society, for there to be equitable access to good quality housing and customer service, organisations will need to positively promote equality, not merely avoid discrimination.

2 Housing associations should work together to conduct and publish a thorough audit of all social housing in England.

Organisation leading on this work: NHF

The BSHR panel found that the sector does not have a shared, consistently detailed understanding of the quality of housing association homes.

They also found that the sector can do more to robustly link information about residents' protected characteristics and additional needs with property information. This would enable us to better understand and address the issue that Black, Asian and Minority Ethnic residents are more likely to experience damp and mould in their homes. It would also allow us to better identify where residents have disabilities, health conditions and other needs which should be considered when prioritising repairs and maintenance work.

In response to this the NHF and CIH are proposing to:

- Develop, in collaboration with housing associations, a new set of core indicators on the condition of our homes and who lives in them.
- Work closely with the Regulator and officials to ensure the core indicators and broader work fully take into consideration the revised Decent Homes Standard, which is due to be consulted on in 2023, and the new consumer regulation standards.
- Continue to influence these legislative and regulatory changes as they develop.
- Consult on our proposals as we develop them with all NHF and CIH members to ensure they are workable for different types of organisations, including smaller and supported housing providers.
- Share examples of good practice from the work already ongoing to improve the quality of housing association homes.

The overarching aim of this work is to support housing associations to build up the data they need to effectively monitor property condition and then take informed, equitable action to improve the quality of their homes.

This is a significant piece of work which will take at least a year to design and launch. We will then work with housing associations to help them embed any changes needed over a period of multiple years.

3 Housing associations should partner with residents, contractors and frontline staff to develop and apply new standards defining what an outstanding maintenance and repairs process looks like.

Organisation leading on this work: CIH

The BSHR panel found that dissatisfaction with repairs and maintenance work is a particular concern for residents. The panel noted that barriers relating to disability, ethnicity, not having English as a first language, communication impairments and poor mental health, amongst other factors, all contribute to people not being properly heard when they raise concerns.

The sector faces significant challenges in delivering repairs and maintenance services, with a backlog of work due to the pandemic and a shortage of available contractors.

In response to this:

- The NHF and CIH will support housing associations to review their maintenance and repairs processes, working with residents, contractors and staff to see where standards and delivery can be strengthened. We will have a particular focus on ensuring that equitable services are provided to all residents.
- CIH will establish a Best Practice in Repairs and Maintenance Group'. Through this group we will identify and develop key metrics on repairs and maintenance performance that could be used to track improvements. CIH will ensure the group's expertise includes tackling systemic racism and inequality.

4

CIH should promote the traditional housing officer role as a supported and valued employment opportunity with a Chartered Institute of Housing recognised programme of training and continuing development.

Organisation leading on this work: CIH

The BSHR panel heard examples of significant levels of stress and low morale being experienced by some social housing staff in resident-facing roles. The panel heard they are not given the resources needed to do the job well and do not feel empowered to take the necessary steps to solve residents' problems.

The panel heard that as a result there are very high turnover rates of staff who work directly with residents. This is making it harder for many residents to build trusting relationships with their landlord.

In response to this CIH will:

- Promote qualifications, training and professional standards for the housing officer role in 2023 and beyond, taking into account the government's new qualification requirements for senior managers and leaders.
- Be mindful to ensure the course content and promotion is inclusive and clearly embraces diversity, avoiding creating systemic barriers or marginalising those who share protected characteristics, in particular Black, Asian, Minority Ethnic and disabled people.
- Encourage and support housing associations to explore inclusive recruitment and to reflect on organisational culture ensuring staff members are supported, nurtured and enabled to work to the best of their abilities.

5

Housing associations should work with all residents to ensure that they have a voice and influence at every level of decision making across the organisation, through both voluntary and paid roles.

Organisation leading on this work: NHF

The BSHR panel acknowledged the extensive work across the sector in recent years to strengthen resident engagement in organisational decision making. However, they found the voices of Black, Minority Ethnic and disabled residents are still too often excluded. Consequently, the issues that disproportionately impact these groups, such as overcrowding, unsafe and poor-quality housing and language barriers, are not always given proper emphasis.

The panel highlighted that this problem is further compounded by the lack of diversity in leadership positions and on housing association boards.

In response to this the NHF will:

- Increase the number of Together with Tenants adopters. Together with Tenants is the NHF's sector-wide initiative focused on strengthening the relationship between residents and housing association landlords. There are currently 221 adopters of Together with Tenants, who collectively own 86% of housing association homes. By April 2024 we aim to have increased the number of adopters by 25%, reaching more than 90% of housing association homes.
- Revisit our Together with Tenants Charter to ensure it captures our ambition to eliminate inequality and racism, and that it aligns with changes to consumer regulation.
- Offer our support to Together with Tenants adopters by sharing good practice on involving residents in decision-making, particularly where organisations ensure the residents included in decision making are diverse and contribute a range of different experiences. We will amplify the perspectives and concerns of Black, Asian and Minority Ethnic residents.

6

Housing associations should develop a proactive local community presence through community hubs which foster greater multi-agency working.

Organisation leading on this work: CIH

The BSHR panel found that too many residents are concerned about reduced face to face contact with their housing associations. They found this can make it difficult for residents to resolve issues. This is especially true where English is not a first language.

Based on some of the positive examples the panel saw, they recommended that housing associations create more community-based hubs. They also recognised that the concept of a specific community hub may not be appropriate for all housing associations but noted that the principles of increasing the physical presence of the landlord applied to all.

For CIH and the NHF this recommendation is an opportunity to profile much of the good work already happening across the sector, within our communities, and to facilitate learning. Where desired, collaboration between mainstream housing associations and BME housing associations could be key to ensuring culturally inclusive spaces and services thrive. Through events, networks and online communications we will share examples of where community hubs and other local presences are working well with and for residents. Throughout the work, we will maintain a particular focus on the role of culturally inclusive spaces for racially and ethnically diverse residents.

7 Housing associations should support residents and frontline staff to undertake an annual review of the progress each organisation is making in implementing this review's recommendations.

Organisation leading on this work: NHF

This final recommendation is about making sure the BSHR has real impact. It calls on housing associations to make regular assessments of their work as they deliver all of the recommendations in the BSHR report and lessen inequitable access to good quality housing. The report highlights the particular value of involving diverse resident-facing staff and residents in these regular assessments.

Our work at the NHF and CIH on this recommendation has led us to the conclusion that the most important and useful assessments will be carried out at the level of individual housing associations.

- We will support housing associations to set up such mechanisms by sharing best practice.
- We will highlight examples that have successfully used engagement from residents and staff with diverse backgrounds.
- Using publicly reported data, we will track progress at a national level in the quality of social housing, customer service and equitable access to good quality housing. This will tie in with our work to track progress as housing associations deliver against their core purpose as set out in recommendation one.

We know that changes are already being made and huge investment is going in to improving the quality of existing homes and services. Changes will continue to be made over the coming years and we want to track this progress so we can demonstrate that housing associations are accountable, listening to their residents, and making changes where they're needed.

Taking forward the BSHR recommendations in detail

1 Every housing association, and the sector as a whole, should refocus on their core purpose and deliver against it.

The problem this recommendation is seeking to address

Even though the vast majority of social homes are safe and of decent quality, there are too many examples of homes that fall far below these standards. Black, Asian and Minority Ethnic people are more likely to have damp in their homes than their white British counterparts.

In a system under pressure, the BSHR panel recommends that housing associations need to test their performance against their core purpose – to provide decent, safe homes for those who can't afford the market.

Action from the NHF and CIH

The NHF and CIH will support and challenge housing associations to focus on and deliver decent, safe homes for their residents. We will pay particular attention to ensuring equitable access to decent and safe homes for Black, Asian and Minority Ethnic residents.

Housing association boards are responsible for defining their own individual organisational purpose. The NHF 2020 Code of Governance is one mechanism for exploring this and through our 2022 Strategic Review the NHF agreed with our members a core purpose which unites the sector. In our view this is consistent with the BSHR suggestion that the core purpose of the sector is “to provide decent, safe homes for those who can't afford the market”.

The role and purpose of the housing association sector

- We provide homes that are affordable to people in housing need.
- We provide safe, good quality homes and services.
- We offer services that enable residents to live well.
- We play our part in building successful places where people want to live.

[NHF's 2022 strategic review](#)

We will continue to promote this statement, and through it the BSHR's definition of core purpose, in all our work. We will encourage housing associations to positively promote equality using anti-racist behaviours, not merely avoiding discrimination, as they reflect on how they meet the sector's purpose and meet the diverse needs of their residents. Adopting the Social Housing Anti-Racism Pledge is one action that we will encourage housing associations to take to make progress in this area.

We will track how the sector is improving the quality of social housing and its service to residents, with a particular focus on addressing racial inequality, by analysing performance across the sector against a set of key indicators. Upcoming legislative and regulatory changes mean that there will be increased scrutiny on the condition of social homes and the delivery of services to residents. All the work undertaken by the NHF and CIH to track progress against the BSHR recommendations will align with these changes, for example by using the Tenant Satisfaction Measures and other existing indicators as key parts of our approach in tracking progress at a sector-wide level.

In order to tackle structural inequalities in our society, we will also continue to support housing associations to think beyond purpose and align with the [race equality duty](#) by proactively focusing on their culture, values and representation. The race equality duty requires public authorities to achieve the objectives under section 149 of the Equality Act 2010 by positively promoting equality, not merely avoiding discrimination. In parallel to this, our aim is to ensure that equitable outcomes are embedded throughout all processes and behaviours and placed at the heart of service delivery. The NHF 2020 Code of Governance is one tool available to housing association boards that can facilitate accountability and transparency in demonstrating equitable outcomes.

The BSHR panel recognises that housing associations are operating in an extremely challenging external environment, including increasing levels of poverty and destitution. It also recognises that there has been a lack of consistent, strategic focus on social housing in government and insufficient funding for critical areas like regeneration. The NHF and CIH will continue to champion the good work that housing associations do and to lobby government for the support and regulatory changes needed for the sector to fully and successfully deliver against its core purpose.

What we will deliver

Actions	Timings
<p>Track how the sector is improving the quality of social housing and its service to residents, with a particular focus on addressing racial inequality, by analysing performance across the sector against a set of key indicators. This will align with our work on recommendation 2 (see below).</p>	<p>Analysis and development of indicators during 2023/24</p> <p>Draft indicators published 2024/25</p>
<p>Support housing associations to reflect on their organisational culture, values and behaviours and to define their own inclusive priorities by identifying and promoting suitable tools.</p> <p>Encourage organisations to develop a culture of curiosity and analysis, promoting the NHF 2020 Code of Governance as a mechanism to demonstrate that equitable behaviours are at the heart of service delivery.</p>	<p>Beginning autumn 2023</p>
<p>Encourage housing associations to reflect on their core purpose. This will include consideration of the fact that social inequalities can put up barriers for some people who need to access housing association’s core services. To help address this we will promote our EDI data tool, provide census analysis and sign post to existing relevant resources.</p>	<p>Beginning summer 2023</p>
<p>Continue to promote the NHF’s available resources – including the Roadmap to Equality, the Chairs’ Challenge, the 2020 Code of Governance and the EDI data tool – as mechanisms to show greater leadership in addressing inequality and creating inclusive environments.</p>	<p>Spring/summer 2023</p>
<p>Promote housing associations who are challenging themselves to deliver on their core purpose, examining their systems, processes, culture and behaviours and who are demonstrating progress. We will deliver this by publishing good practice and case studies, and by using our existing forums – for example networks, roundtables and conferences – for these to be shared.</p>	<p>Beginning autumn 2023</p>

2

Housing associations should work together to conduct and publish a thorough audit of all social housing in England.

The problem this recommendation is seeking to address

The quality and detail of data on stock condition collected across the sector is variable. The regulatory minimum set by the Decent Homes Standard does not provide a meaningful and modern understanding of whether social homes are decent, safe and warm. Data collected on property condition beyond this, for example through stock condition surveys, is not standardised and the methodologies used are varied. A modernised, consistent and comprehensive definition of decency would help the sector to prioritise its resources and to make a strong case for additional government investment in homes that are now outdated.

Across the sector we can do more to robustly combine asset data with resident data. This would enable housing associations to better understand and address the inequity of outcomes for Black, Asian and Minority Ethnic residents that we know exists across all housing types. It would also help landlords to identify residents with disabilities, health conditions and other needs that mean they are at additional risk if issues like damp and mould are not resolved promptly, and prioritise their repairs and maintenance work accordingly.

Better information about property condition allows landlords to make better decisions about how they repair and maintain homes. This would provide a foundation for improvements to the quality of housing association homes.

Action from the NHF and CIH

The NHF and CIH, in collaboration with housing associations, will develop a core set of common indicators and a shared approach to understanding the condition of our homes and who lives in them. We will build on the best practice that already exists within the sector and ensure that this is fully aligned with the updated Decent Homes Standard and consumer regulatory regime.

Working closely with housing associations, we will develop a set of standardised, comparable indicators that we believe all housing associations should collect. We will also develop a broader framework to show ways that this can be augmented with additional up-to-date information about both homes and residents to inform service delivery. This will draw from good practice which already exists in the sector, including in stock condition surveys and in recent work to review and improve processes for responding to damp and mould issues.

We will work with the sector and key stakeholders so that the core indicators can be published and aggregated to give a sector-wide overview of stock condition.

It is important that the data collected on property condition and on residents living in those homes can be linked up, so that the sector can use this information to better understand and address inequities in resident experience, particularly where Black, Asian and Minority Ethnic people have worse outcomes in social homes than their white British counterparts (including where a person's race or ethnicity intersects with other protected characteristics, such as disability). We will support this and share learnings from housing associations who have already collected and used resident data in a meaningful way to improve services and tackle racism and discrimination.

We will work closely with data experts, including HACT, drawing on and sharing expertise from their work on data standards to shape implementation, and highlighting examples where members have used them to positive effect.

It is vital that this work aligns with upcoming legislation and changes to regulation.

We will work closely with the government, officials and the Regulator of Social Housing to ensure the core indicators and broader framework fully take into consideration the revised Decent Homes Standard, the housing health and safety rating system (HHSRS), and the changes to consumer regulation. In doing so, we will make sure we avoid duplicated effort in data collecting and reporting. This work will provide a forum for housing associations to collectively determine how they will most effectively deliver the new requirements set out by government and the Regulator.

We will also continue to influence the government, key officials and other external stakeholders to ensure that new requirements, including the revised Decent Homes Standard, around the quality of social homes and our own work will be both effective in improving conditions for residents and workable for social landlords. As part of this we will emphasise the responsibility that central government has and the role it must play in tackling the structural issues which have resulted in the nationwide shortage of affordable, decent homes.

To deliver this major piece of work, the NHF and CIH has established a task and finish group of member representatives committed to supporting the sector to better understand our homes, including a focus on linking up data on property condition and the people living in our homes, and how we can better use data to drive improvements in the quality of homes.

We will consult regularly with the wider sector to ensure this work is applicable for all housing associations, including smaller organisations and supported housing providers. We will work closely with the Local Government Association,

and other organisations representing stock-holding local authorities, to ensure this work supports both housing associations and local authority landlords to better understand the condition of their homes.

This is a major piece of work – it will take time to get it right and for housing associations to embed any changes within their own practice. We will aim to have draft core indicators and broader framework ready by April 2024, and then will support the sector to embed this over a number of years.

Housing associations are already working to improve the quality of their homes and to ensure they hold better information about their homes and their residents. We will continue to support and draw learnings for the wider sector from this work, and ensure that existing good practice is built into everything we do to take forward this recommendation. Looking forward, some organisations may choose to collect and use more data than we include in our core set of indicators. We will identify examples of this and share them as good practice.

What we will deliver

Actions	Timings
Establish a member task and finish group, consisting of experts in data, housing and asset management, to drive delivery of this recommendation over the next year	First meeting was held April 2023, further meetings are upcoming to shape all other work.
Develop a set of core indicators that set out the condition of housing association homes and the protected characteristics of who lives in them. In addition, develop a broader framework with examples of how up-to-date information can be captured and used to shape effective and equitable service delivery. This will be delivered through engagement and consultation with: <ul style="list-style-type: none"> ● The full NHF membership. ● Key NHF and CIH member groups. ● External stakeholders. 	Draft set of indicators and broader framework developed and revised by April 2024 following consultation throughout 2023/24. We will align with the timescales of revisions to the Decent Homes Standard.
Support the sector to collect this information and to both analyse and use the data to improve services and understand disparities (including identifying where multiple forms of inequality or disadvantage might be compounding and creating obstacles for residents), through guidance, events and webinars.	Over a period of multiple years from spring 2024.
Share good practice from organisations who collect and use additional data points to improve service delivery.	Beginning autumn 2023

3 Housing associations should partner with residents, contractors and frontline staff to develop and apply new standards defining what an excellent maintenance and repairs process looks like.

The problem this recommendation is seeking to address

The sector faces significant challenges in delivering its repairs and maintenance services, with a backlog of work emerging from the pandemic, fewer skilled workers available, and above-inflationary price increases compounding the longer-term underinvestment in social homes.

While extensive work is going on across the sector to improve, we know there is inconsistent delivery and examples where things have gone badly wrong. The BSHR panel raised concerns about how some providers respond to resident concerns and complaints. These issues are impacting on the overall quality of homes as well as tenant satisfaction levels.

It's crucial that tackling stigma is embedded within this action. We know that it is vital for resident-facing housing staff to be non-judgemental of residents regardless of their race, religion, sexuality, disability, age, first language or socioeconomic status.

Many housing associations use external contractors for all repairs and maintenance. Our sector has a responsibility to ensure contractors are respectful and offer equal customer service to all.

Action from the NHF and CIH

The CIH and NHF know that individual housing associations are in the best place to work with their residents to understand and define what an excellent and culturally inclusive maintenance and repairs process looks like for them. This will be different for each housing association depending on the characteristics of the homes they provide and the communities they serve. The BSHR said they came across some noteworthy examples as part of their review.

We will support housing associations to work with their residents, contractors and staff to review their maintenance and repairs process to see where standards and delivery can be strengthened, ensuring that equitable services are provided to all residents regardless of where they live, for example in supported housing or a rural community, and a person’s protected characteristics such as their race, religion, or disability.

The CIH and NHF will share examples of best practice and facilitate conversations between organisations and professionals. From summer 2023 we will work with housing associations to explore how we can publicly demonstrate improvements to maintenance and repairs processes at a sector-wide level, with a particular focus on cultural inclusivity.

To achieve this, we will work with resident groups, contractors, the Housing Ombudsman, BME National, procurement and contracting specialists, and expert colleagues from across the sector to facilitate a Best Practice in Repairs and Maintenance working group to drive forward improvements, ensuring cultural inclusivity and the best possible service delivery at a sector level.

Through the group we will identify the key metrics that can better support board and resident scrutiny of repairs and maintenance performance at the landlord level. The group will be mindful of the need to ensure that the metrics developed align with and complement new regulatory requirements, and of the particular challenges facing very small housing associations in collecting and sharing data.

What we will deliver

Actions	Timings
Establish a Best Practice in Repairs and Maintenance Group, ensuring expertise includes tackling systemic racism and inequality, and work with them to identify and develop key metrics on repairs and maintenance performance that housing association boards and residents could use to measure performance and track improvement.	Group established summer 2023, work ongoing from autumn 2023
Publish case studies of housing associations who have developed their repairs and maintenance services in partnership with residents, contractors and resident-facing staff, and reflect on best practice with consideration to equality, diversity and inclusivity.	Winter 2023/24
Facilitate conversations between housing associations, professionals and a diverse range of residents to drive collaboration and to define and deliver against clear expectations on repairs and maintenance services.	Ongoing

4

The CIH should promote the traditional housing officer role as a supported and valued employment opportunity with a Chartered Institute of Housing recognised programme of training and continuing development.

The problem this recommendation is seeking to address

The BSHR report heard about high turnover rates of staff who work directly with residents. This is making it harder for many residents to build trusting relationships with their landlord. The BSHR notes the significant level of stress and low morale being experienced by people in resident facing roles who are not being given the resources needed to do the job well and do not feel empowered to take the necessary steps to solve residents' problems.

Combined with this, many residents are increasingly vulnerable in light of the cost of living crisis, with Black, Asian and Minority Ethnic residents once again disproportionately affected. Housing associations may need to ensure that all resident-facing staff are empowered with an appropriate understanding of the cultural needs of Black, Asian and Minority Ethnic residents.

Action from the NHF and CIH

The social housing sector is a great place to work, with significant career opportunities. The NHF and CIH want to encourage it as a vocation and will support housing associations to provide a clear career development framework for all staff, including those undertaking a 'housing officer' or equivalent role. We will take into account the government's new qualification requirements for senior managers and leaders and be mindful to ensure course content and promotion is inclusive and clearly embraces diversity, avoiding creating systemic barriers or marginalising those who share protected characteristics, in particular Black, Asian, Minority Ethnic and disabled people.

This will include opportunities to develop and recognise existing skills, knowledge and experience and to demonstrate, behaviours, attitudes and empathy (supported by CIH's professional standards – the seven characteristics that comprehensively reflect our collective identity as a profession: an understanding of what's important,

what we stand for and what we’re trying to achieve). We will encourage and support housing associations to explore inclusive recruitment and, linking back to our actions for recommendation one, to reflect on organisational culture ensuring staff members are nurtured and enabled to work to the best of their abilities.

We will support housing associations to ensure that residents have accurate expectations of service levels, equally receive the service that is required regardless of their race or ethnicity and understand and can access effective routes for redress when this is not achieved. We will also support housing associations to ensure that services are delivered respectfully and address experiences of stigma.

What we will deliver

Actions	Timings
Promote qualifications, training, CPD, professional standards, networking opportunities, webinars, events and policy briefings, clearly demonstrating the links between each and progression routes and being mindful to avoid creating systemic barriers to Black, Asian and Minority Ethnic people through both content and promotion.	From summer 2023
Ensure a clear focus on the CIH code of conduct, code of ethics and mechanisms for dealing with breaches in all our relevant communications, including racial discrimination, and structural racism.	Beginning summer 2023
Promote housing associations who are implementing professional standards, broader career development frameworks, and inclusive recruitment practices. We will highlight how these are impacting on service provision, especially in improving both the retainment of staff and cultural awareness for racially and ethnically diverse residents.	Beginning summer 2023
Make the link clear for greater representation throughout housing association workforces, including leadership and board positions, to improve resident services and encourage housing associations to recognise diversity as an essential part of their corporate strategy or plan by promoting the NHF EDI data tool.	Beginning spring 2023

5 Housing associations should work with all residents to ensure that they have a voice and influence at every level of decision making across the organisation, through both voluntary and paid roles.

The problem this recommendation is seeking to address

Despite extensive work across the sector in recent years to strengthen resident engagement in organisational decision making, many residents and stakeholders reported that there is more to do to engage with marginalised residents, and to embed resident voice and influence throughout the sector.

It is vital that housing associations ensure resident voices are diverse, especially because Black, Asian and Minority Ethnic groups and disabled residents are under-represented in resident groups and over-represented in social housing.

Action from the NHF and CIH

The NHF will continue to drive forward the Together with Tenants Charter and communicate to adopters the expectations that are in place for housing associations that sign up. We will offer our support to adopters and share good practice and cases studies on involving residents in decision-making, especially in amplifying the perspectives and concerns of Black, Asian and Minority Ethnic residents.

The NHF will also review the Together with Tenants charter to ensure there is a focus on equality, diversity and inclusion, and that housing associations are committed to providing opportunities for valued contribution and inclusion to a much wider diversity of residents. We will ensure that the charter, and any revisions made to it, align with upcoming changes to consumer regulation including the tenant satisfaction measures.

We will encourage housing associations that are not already adopters to sign-up to deliver the Together with Tenants Charter Commitments. There are currently 221 adopters of Together with Tenants, who collectively own 86% of housing association homes. By April 2024 we aim to increase the number of adopters by 25% and reach more than 90% of housing association homes.

What we will deliver

Actions	Timings
<p>Revise the Together with Tenants Charter to align with changes to consumer regulation and embed equality, diversity and inclusion as a vital component, with a focus on representation, especially of Black, Asian and Minority Ethnic residents, and publish a revised Charter.</p> <p>Through this exercise, encourage housing associations to work with residents to define which are the key decisions that should be consulted on with resident groups, ensuring the scope and clarity of the roles are clear for both parties.</p>	Summer 2023
<p>Use existing networks, webinars and events to show housing associations how Together with Tenants will help meet the BSHR recommendations; and promote Together with Tenants amongst residents, raising awareness of the commitments and opportunities to get involved</p>	Summer 2023 onwards
<p>Ensure housing association boards take responsibility for equality, diversity and inclusion, both setting the right culture and embedding the need for ethnically and racially diverse resident voices to be heard throughout their organisation by further promoting the NHF's Roadmap to Equality , engaging via board member networks and through case studies showcasing best practice.</p>	Beginning summer 2023
<p>Where desired, connect mainstream housing associations with local BME housing association resident groups to create mutually beneficial relationships, sharing knowledge and amplifying the voices of Black, Asian and Minority Ethnic residents.</p>	Beginning autumn 2023
<p>Promote examples of housing associations who have made purposeful efforts to ensure diverse voices are heard and represented. Where relevant, this should include examples of how to understand which residents are more likely to be paid and of overcoming biases that might exist in this process.</p>	Beginning autumn 2023

6

Housing associations should develop a proactive local community presence through community hubs which foster greater multi-agency working.

The problem this recommendation is seeking to address

The Review panel found that too many residents are concerned about reduced face to face contact with landlords which can make it difficult to resolve issues, particularly where English is not a first language.

The panel also pointed to a lack of organisational community presence within some areas. It noted that residents may be engaged with several public and voluntary sector bodies as well as their landlord and called for a commitment to multi-agency working (social infrastructure).

Based on some of the positive examples the panel saw, they recommended that housing associations seek to create more community-based hubs. This could either be by engaging with existing ones or setting up new ones. The panel highlighted the need for mainstream housing associations to support and collaborate with BME housing associations to ensure that culturally sensitive facilities thrive.

Whilst recommending a focus on creating and supporting communal spaces, the panel recognised that the concept of a specific community hub may not be appropriate for all housing associations. However, it noted that the principles of proactively working to increase the physical presence of the landlord should apply across the sector. This includes staffing, events and other initiatives as well as hubs. It also includes building a wide range of connections between residents and landlords as well as investing in multi-agency working.

Action from the NHF and CIH

Working with partners such as HACT, CIH and NHF will share examples of where community hubs and other local presences are working well with for residents, emphasising the role of culturally inclusive spaces for racially and ethnically diverse residents. We will recognise the diversity of the sector in this work and share examples that work for different types of housing providers. This is an opportunity to profile much of the good work already happening. Collaboration could help to address many of the challenges highlighted in the Review.

Through sharing physical space, facilities and staff, both large and small housing associations might be more able to provide culturally sensitive in-person services with and for residents.

What we will deliver

Actions	Timings
Identify and share learning from examples of beneficial collaboration with local government services and from organisations who have developed an inclusive, proactive community presence tailored to local need.	Summer 2023
Provide forums – for example in networks, roundtables and conferences – for housing associations to share and develop good practice, highlighting the need for collaboration with BME housing associations where possible.	Beginning autumn 2023
Publish case studies and share good practice on how housing associations have established a community presence or are developing one, in particular the need for inclusive and culturally sensitive services for ethnically diverse communities.	Beginning autumn 2023

7

Housing associations should support residents and frontline staff to undertake an annual review of the progress each organisation is making in implementing this review's recommendations.

The problem this recommendation is seeking to address

It is important that the recommendations of the BSHR have real impact. To understand how much progress has been made against the recommendations the BSHR suggests that housing associations make regular assessments of their work, Resident facing staff and residents have the experience and insight to help ensure that the ambitions in these recommendations become a reality on the ground.

Action from the NHF and CIH

We recognise that the most important and useful assessments of progress against the BSHR recommendations will be carried out at the level of individual housing associations. NHF and CIH will work with housing associations to support them in setting up mechanisms that ensure resident and staff oversight of progress against the BSHR recommendations. We recognise this may look different between organisations, depending on their size and the services they provide in addition to housing.

Much of this can draw from existing or forthcoming regulatory reporting requirements, particularly the tenant satisfaction measures and other requirements emerging from changes to consumer regulation. Working with our members, we will review existing and upcoming reporting requirements to identify which would provide useful insight into progress against the BSHR recommendations.

The same mechanisms could be useful for measuring the progress of wider work on improving quality and accountability to residents. This oversight could be carried out either through new or existing scrutiny arrangements and structures.

As set out under recommendation one, we will track how the sector is improving the quality of social housing and its service to residents.

We will also share learnings from existing good practice of resident oversight and scrutiny in the sector, particularly where this involves engagement with a diverse range of residents.

The BSHR stresses throughout the importance of tackling structural inequalities and outcomes for people from Black, Asian or Minority Ethnic backgrounds. We will work with housing associations and other stakeholders to understand and learn from best practice in how we can assess and track progress on this.

What we will deliver

Actions	Timings
Identify existing/upcoming data points which can be used to track progress against the BSHR recommendations (as set out under Recommendation 1)	Summer 2023
Identify and share good practice from housing associations in monitoring progress against the BSHR recommendations including monitoring outcomes for Black, Asian and Minority Ethnic people living in housing association homes.	Agree process beginning summer 2023, publish updates on progress from the end of 2023
Support housing associations to create mechanisms for representative and diverse resident oversight and scrutiny of progress against the BSHR recommendations by identifying good practice and sharing case studies.	Beginning summer 2023

Conclusion and next steps

This document is an action plan which sets out what the NHF and CIH will do to work alongside housing associations to deliver on the BSHR panel's recommendations.

It is an evolving document, which will develop and grow as we implement, learn and build on the actions. Throughout 2023 we will provide updates to our members and on our website as we deliver these actions.

For more information please contact:

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Housing associations are improving the quality of their homes where they can. From 2021 to 2022 they increased investment in existing homes by 20%.

Now, we also need to see more investment from government. The NHF and CIH are calling on government, along with the BSHR panel and the Levelling Up, Housing and Communities' Select Committee, to introduce funding specifically for regeneration and to deliver on its commitment to increase the supply of homes for social rent.

About the NHF and CIH

NATIONAL HOUSING FEDERATION

The NHF is the voice of housing associations in England. Our members own over 96% of housing association homes in England, providing 2.7 million homes to around six million people.



Chartered
Institute of
Housing

CIH is the independent voice for housing and the home of professional standards. It is a registered charity and not-for-profit organisation with a diverse membership of people who work in the public and private sectors, in 20 countries on five continents across the world.