



The key issue for tenants

Stop Social Housing Stigma submission to the Regulator of Social Housing's (RSH) consultation on proposed changes to consumer standards and requirements

STOP SOCIAL HOUSING STIGMA (SSHS) is the tenant-led campaign set up in 2017 to tackle social housing stigma.

The Regulator of Social Housing's (RSH) consultation on the Competence and Conduct Standard and other issues is a consultation asking whether they have correctly interpreted Government directions on various issues.

SSHS have therefore decided to use our response to the consultation to reflect on what is the culmination of a process that started in 2017 following the Grenfell tragedy at the same time that SSHS started.

SSHS welcomes that:

- a) the Government is now introducing various measures with the aim of making social housing tenants' homes safe and healthy
- b) the Regulator of Social Housing has now been able to re-establish itself as an organisation that takes an interest in the services that tenants receive. SSHS particularly pays tribute to the work of Kate Dodsworth and her team at the RSH for their pursuit of this objective.

However, this is not enough.

Indeed it has been stigmatising, that successive Governments since Grenfell have chosen to progress the initiatives they considered important in the wake of the Grenfell tragedy whilst considering unimportant the issues that tenants considered to be the most important.

Tenants made it clear in the Ministerial roadshows that took place in the aftermath of the Grenfell tragedy that social housing stigma was their most important issue and Government clearly knew and documented this.

“As the 8,000 conversations and submissions behind this Green Paper show, many people living in England’s four million social homes feel ignored and stigmatised, too often treated with a lack of respect by landlords who appear remote, unaccountable and uninterested in meeting their needs”. “Stigma was the most consistent theme raised by residents at the engagement events. Residents told us that they were made to feel like second-class citizens. They reported being treated as an underclass”

A New Deal for Social Housing – Ministry of Housing, Communities & Local Government - August 2018

The Green Paper went on that “we have a collective responsibility to tackle the stigma associated with social housing”. Having made a commitment to “begin to tackle the stigma which for too long has been associated with social housing”, the Green Paper went on to identify tackling stigma as one of the five central principles for social housing’s New Deal.

A ongoing failure to respond to tenant concerns about stigma

The timeline of events relating to stigma since that time is as follows:

- **2018** – the Green Paper launched including references to support for the SSHS campaign and to tackle stigma
- **2020** – publication of the subsequent White Paper “The Charter for Social Housing Residents” – with changing political priorities, references to social housing stigma reduced to 4 mentions and no actions to tackle it
- **2022** – a Professionalisation Working Group is set up by Government to examine professional qualifications in the social housing sector. It is not clear whether Government setting up a working group is intended to contribute to tackling stigma, but the first meeting of the working group – bringing together senior representatives from the social housing sector and tenant representatives – unanimously agrees that professional

qualifications on their own will not achieve the cultural changes necessary to meet the concerns tenants had raised post Grenfell

- **2023** – the Professionalisation Working Group identifies that the outcomes they are seeking are that:
 - a) residents would be treated with respect and trust their landlord;
 - b) frontline staff would be empathetic and skilled in listening to residents, as well as having the practical skills and knowledge to deal with issues effectively;
 - c) landlords would deliver a consistently high-quality service; and
 - d) internal systems and processes would function effectively.

The Professionalisation Working Group goes on to point out that “an overly prescriptive approach to qualifications and training for staff could inhibit the flexibility of landlords to make sure staff are trained and developed in the most appropriate way for their roles and to meet the particular needs of their tenants”.

- **2023** – the Social Housing Regulation Act introduces prescriptive and mandatory requirements for senior staff in the Registered Provider sector to be encapsulated in the Competence and Conduct Standard.
- **2024** – in the Parliamentary debate on the Grenfell tragedy report, the Prime Minister recognises an ongoing need for cultural change in the social housing sector.
- **2024** – the Government launches a consultation on the Competence and Conduct Standard direction. There are two references in its preamble to an aim of the direction being to tackle social housing stigma. SSHS points out that the objective will not be met by the proposed professionalisation methods. We also pointed out that qualifications already exist in the social housing sector and do not contribute to tackling stigma. Indeed, one tenant we spoke to feared that adding more letters after staff’s names might simply serve to make them more stigmatising and more distant from tenants.
- **2024/2025** – SSHS makes many suggestions to Government about how they could genuinely start to tackle stigma. Eventually in November 2025, the Government agrees to meet with us and start a dialogue.

- **2025** – the Government publishes its direction regarding the Competence and Conduct Standard. It still purports that “it will drive the culture change necessary to eradicate unprofessional attitudes and stigma”, but there are no measures in the direction that will contribute to that objective.
- **2026** – the Regulator of Social Housing finally publishes a draft regulatory standard. Despite the direction’s ambition that the standard will *eradicate stigma*, the eventual standard and its related consultation paper now makes no mention of tackling stigma.

The consequence of Governmental failure to respond to tenant concerns

The consequence of this failure to respond to tenant concerns is that social housing stigma continues unabated. The lives of social housing tenants continue to be blighted by it on a daily basis. SSHS’s national tenant survey (now responded to by 1644 tenants) is producing shocking results:

- Over two thirds (70%) of social housing tenants feel stigmatised living in social housing
- Over half (54%) feel stigmatised because of the actions of their landlords
- Over two-thirds (68%) consider the Government has done little or nothing at all to address stigma
- Over one-third (40%) consider the RSH has done little or nothing at all to address stigma (16% consider it has done a little whilst 5% consider it has done a lot).

Government commitments to tenants have not been delivered on. Our emerging findings highlight the persistent and damaging effects of stigma. This is not just about perception—it’s about lives, dignity, justice, wellbeing and inclusion, and indeed the future of social housing.

Specific issues in the RSH consultation paper

Tackling stigma in the regulatory standards is currently limited to the ambiguous and difficult to define *fairness and respect* standard. *Fairness* and *respect* are in fact very different concepts and that they have been thrown together suggests that the architect of the standards was aware how vague both terms were and thought their vagueness warranted them being housed in the same standard.

There is no definition of the terms in the standard or the accompanying Code of Practice and no suggestion of what they might mean. The new Code of Practice refers to a *culture of fairness and respect* with the additional vague concept of *courtesy* added in alongside listening to tenants and tenants trusting their landlords. The Code of Practice concludes its brief *explanation* of what the *fairness and respect* standard means by referring to landlords adapting their services to meet tenant needs – already part of another standard.

Perhaps it is not surprising that the RSH chose not to take social housing stigma out of the *too difficult to deal with* box it was put in by civil servants back in 2018. It is perhaps only tenants who know what social housing stigma is because they live with it on a daily basis.

But there is now a growing body of work that does define social housing stigma, produced by SSHS and by various academics. There are also now growing numbers of tenants, landlord staff, contractors, operatives and others who are starting to understand why tenants labelled social housing stigma as their most important priority back in 2018. And SSHS's experience is that the landlord staff, contractors, operatives and of course tenants want to see a social housing system where stigma is properly addressed.

Behaviours needed?

It is also disappointing that in producing the Competence and Conduct Standard that the vague and ambiguous references to *fairness* and *respect* have been amplified by frequent references to undefined *behaviours needed* amongst staff – “Registered Providers must secure that their relevant staff have the necessary skills, knowledge and experience, and exhibit the behaviours needed for the landlord services to be of good quality”.

What does that mean? It is not explained by the proposed amendment to the Code of Practice – “for landlord services to be of good quality, relevant staff need to have the necessary skills, knowledge and experience, and exhibit the behaviours needed”.

It goes on to say that good quality services involve “delivering fair and equitable outcomes for tenants” – again part of another standard already - “and treating them with fairness and respect” – still undefined and no suggestion of what is expected.

Tenants (and their landlords) look to the regulator to set out a framework for what is expected of Registered Provider landlords. Introducing more vague concepts into the regulatory standard lexicon without explanation is not helpful and will not lead to the issue that tenants identified clearly as being their most important priority back in 2018 being addressed.

What needs to happen?

Government and the Regulator need to reflect on the fact that they have not delivered on the most important issue raised by tenants in the post Grenfell period and that the consequences are the shocking statistics emerging from our national survey of tenants.

Government and the Regulator need to:

- **positively sign up to the SSHS campaign.** SSHS is a non-commercial campaign led by tenants. Signing up to the SSHS campaign means putting one's name to the fact that social housing stigma is wrong – that 4 million households should not be seen as the underclass in the UK. It is a non-party political issue, and it is difficult to conceive what a Regulator of Social Housing is if it does not believe that social housing stigma is wrong.
- **work with the SSHS campaign** to define the minimum that should be expected of Registered Provider landlords in tackling social housing stigma – which should at least include every landlord being required to work with their tenants to develop a strategy to tackle stigma. This should include providing some guidance regarding *fairness, respect, behaviours* etc to the sector regarding what is expected on these critical cultural issues that are fundamentally important to tenants.

There are some equivalent models of behaviours expected in the NHS (the 6 C's - care, compassion, competence, communication, courage, commitment) and SSHS stands ready and willing to work with the regulator to define what is expected. Indeed our Journey Planner identifies some of the behaviours expected – but a quick analysis in the SSHS committee suggested that issues such as patience, empathy, can do attitudes, listening, empathy, positivity, solution focussed approaches, following up, communication, and the use of language could all be areas that could be considered amongst others.

- **support the SSHS Journey Planner** and publicise it. The Journey Planner is a flexible tool that requires landlords to work with their tenants and others to identify and develop actions to tackle stigma. SSHS has made it clear that we are not prescriptive about how this should be done – and in the absence of any other framework to tackle social housing stigma and with growing willingness amongst landlords to explore the Journey Planner, the lack of Government and Regulator publicity for the only framework that does exist to tackle stigma appears inappropriate.
- **engage with SSHS generally on other programmes** to enable debate and discussion across the sector about how to tackle social housing stigma both internally in the sector and more generally across society. In particular, subject to resources, but in response to issues raised with us by tenants and landlords, SSHS are considering programmes to:
 - a) develop a stigma measurement tool – a prototype measurement tool has already been developed and there are a few landlords willing to pilot its use
 - b) carry out a national project with tenants and landlords about the use of language within the sector. Tenants have particularly identified that some language used in the sector detracts from the culture of home that is important to tenants and lends itself to the perception that landlords perceive tenants to be but temporary occupants of properties owned by landlords.
 - c) carry out a national project where tenants lead reviews of how landlords are tackling stigma using the Journey Planner.

These would all be programmes where it could be expected that the regulator should take an active interest.

In conclusion, the regulator needs to understand that tenants feeling like the underclass is an issue of fundamental importance to them, and it needs to carefully consider what its role is in relation to tackling stigma. SSHS is now generally seen as the leading authority on tackling stigma and we are ready and willing to help the regulator achieve a meaningful role in this area.

For further information about this submission, please contact:

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