

# THE PIONEER GROUP'S RESPONSE TO THE GREEN PAPER 2018

QUESTION	COMMENTS/CONTEXT
<p><b>10. How can resident's best be supported in this important role of working with landlords to ensure homes are safe?</b></p>	<ul style="list-style-type: none"> <li>• Clarity about what the scope of 'safety' is here – quite rightly there has been a significant raising of awareness and strengthening of responses to fire safety but safety reaches across a range of compliance items including electrical, gas, asbestos, legionella.</li> <li>• Sharing information on issues such as fire safety is incredibly sensitive and potentially complicated – I understand a desire for transparency but fire risk assessment is very dynamic and would questions how can this be shared in real time? Perhaps an approach is an annual statement of compliance across all safety areas could be published online/annual tenants report.</li> <li>• There could be an ask and offer approach – tenant rightly should have an offer from their landlord that keeps them safe but landlords should be able to ask (and potentially enforce) behaviours of tenants and residents</li> </ul>
<p><b>11. Should new safety measures in the private rented sector also apply to social housing?</b></p>	<ul style="list-style-type: none"> <li>• The green paper is heavily focussed (arguably disproportionately focussed) on one type of landlord, social landlords, yet we account for only 17% of households - the focus should be proportionately focussed on the private rented sector for who, regulation and enforcement is significantly weaker.</li> <li>• <a href="#">The Pioneer Group</a> has actively engaged in the private rental market through necessity on Castel Vale – buying back sold RTB homes that have fallen into the hands of disreputable landlords historically and more recently intervening in a broken private rental market in Stockland Green where private landlords are engaged in poor practices in HMO's (where the Local Authority has struggled to enforce licencing obligations)</li> <li>• Are RP's are being hit with hammer to crack a nut – we have a strong history of taking tenant and resident safety very seriously and whilst tragedies like Grenfell should never happen the important things is that we learn lessons – the reality is that standards in the private rented sector can be more shocking for many more people in terms of scale than in the RP social sector. The examples quoted around smoke alarms, carbon monoxide detection and electrical safety would not cause any issues with the social housing sector and parity across tenure generally makes sense.</li> </ul>

QUESTION	COMMENTS/CONTEXT
<p><b>12. Are there any changes to what constitutes a decent home that we should consider?</b></p>	<ul style="list-style-type: none"> <li>• There is an opportunity to bring together all maintenance expectations on social landlords (including health and safety) together into a single standard</li> <li>• The decent homes standard is too narrow and could be reconstituted to include a wider set of parameters outside the home and take a more qualitative approach – allowing landlords to engage with communities to address local needs and priorities.</li> <li>• There is an opportunity to address investment decisions across a wider spectrum of local needs (whilst ensuring minimum standard) and opportunity to future proof investment around environmental efficiency concerns</li> <li>• Decent homes only applies to social landlords – a proportionate response would require a cross tenure approach that really addressed the poor standards in the private rented sector</li> </ul>
<p><b>13. Do we need additional measures to make sure social homes are safe and decent?</b></p>	<ul style="list-style-type: none"> <li>• Broadly no – the sector and The Pioneer Group takes its responsibilities extremely seriously and has made significant investment in our assets (even through the period of rent cuts) and we continue to respond robustly to the latest learning from the Grenfell tragedy – our tenants support the approach we have taken and help us set out priorities locally. We know from regression analysis of our annual satisfaction data that asset investment, responsive repairs and having a clean and tidy neighbourhood are our tenants priorities – being able to respond locally to the voice of our tenants should not require additional measures from central government.</li> </ul>
<p><b>14. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?</b></p>	<ul style="list-style-type: none"> <li>• Our complaints policy allows for tenants to seek support from an independent person (this could be a mediator).</li> <li>• The Ombudsman service should be reserved for the most complex (potentially vexatious) cases and organisations should have common approach to complaint resolution that includes tenants early in the process – mediation may be helpful but it shouldn't be used as another hurdle to customers getting resolution particularly when local independent services are stretched (potentially building in more delays)</li> <li>• Our view is that it is hard to regulate for what is often about organisational culture – at The Pioneer Group we have worked hard with our customers to shape our complaints policy and practice and invested in frontline colleagues to adopt a first visit fix approach i.e. do what it takes to resolve the customers concerns without need of redress through a complaints process – this is about being a 'Pioneer person', attitude and culture.</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>15. Should we reduce the eight week waiting time to four weeks? Or should we remove the requirement for the 'democratic filter' stage altogether?</b>	<ul style="list-style-type: none"> <li>• The democratic filter is rarely used nor understood – we build relationships with local MP and Cllrs in any event and treat all such enquiries through MP/Cllr offices as complaints in so much as we seek resolution swiftly</li> <li>• We believe the sector could develop a common approach to complaints designed by tenants for tenants through a new national tenant's body of some kind.</li> </ul>
<b>16. What can we do to ensure that “designated persons” are better able to promote local resolutions?</b>	<ul style="list-style-type: none"> <li>• MP's and Local Cllrs are often points of contact and we work closely with ours locally to build relationships and respond within set time frames to enquiries on behalf of their constituents – this expectation could be incorporated into the consumer standard without change to primary legislation and would not place additional burdens on providers.</li> </ul>
<b>17. How can we ensure that residents understand how best to escalate a complaint and seek redress?</b>	<ul style="list-style-type: none"> <li>• We believe the sector could develop a common approach to complaints designed by tenants for tenants through a new national tenant's body of some kind – a national complaints charter developed by tenants could then be incorporated into consumer standards (the bar around serious detriment within regulation can be lowered so that Regulator can look at consumer standards in a new light – through IDA and existing regulatory powers. Boards of providers should be viewing and questioning customer satisfaction data as a matter of course and within this satisfaction with complaint handling and outcomes should form a crucial role</li> </ul>
<b>18. How can we ensure that residents can access the right advice and support when making a complaint?</b>	<ul style="list-style-type: none"> <li>• The Pioneer Groups approach of early intervention and a robust three stage process – Stage 3 being an independent tenant panel allows for effective advocacy. The tenant's panel will challenge and question the executive regards decisions</li> <li>• We rarely find tenants escalate the complaint to the Ombudsman but when they do the response in our experience has been a positive one – a genuine independence and fair approach – the issue is the time it takes with current wait over 8 weeks</li> <li>• The Ombudsman service or similar could provide advocacy particularly if the customer has additional support needs – though the principle of exhausting the organisational policy first should remain</li> </ul>

QUESTION	COMMENTS/CONTEXT
<p><b>19. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?</b></p>	<ul style="list-style-type: none"> <li>We believe the sector could develop a common approach (charter) to complaints designed by tenants for tenants through a new national tenant's body of some kind – the setting of guidelines would be helpful within consumer standards though it should be noted that investigation into complex complaints can by their nature in order to be thorough take time. Setting and agreeing expectations at the start of a complaints process is important as is communication through the process.</li> </ul>
<p><b>20. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?</b></p>	<ul style="list-style-type: none"> <li>Safety concerns should be treated as complaints and responded to within policy guidelines – if the sector adopts clearer national guidance through a charter this could be achieved</li> <li>Landlords should produce and share with tenants in the annual tenants report how they have dealt with complaints (including safety concerns) – lessons learnt; escalations; resolution at point of contact etc. This could be written into a new look consumer standard and designed by a new national tenants body</li> </ul>
<p><b>21. Do the proposed key performance indicators cover the right areas?</b>            KPI's:            - Keeping properties in good repair;            - Maintaining the safety of buildings;            - Effective handling of complaints;            - Respectful and helpful engagement with residents; and,            - Responsible neighbourhood management, including tackling anti-social behaviour.</p>	<ul style="list-style-type: none"> <li>Yes the KPI's identified are a good starting point BUT like the sector scorecard for VFM why not have a 'consumer scorecard' – a baseline set of KPI's that all landlords are expected to meet then each landlord can add to that list with their own KPI's pertinent to their corporate aims and customer expectations? The landlords expectations against the baseline set of KPI's and their own KPI's will be measured by their Boards and subject to Governance rating by RSH</li> <li>The Pioneer Group has a wide range of performance indicators across a diverse range of activities – we are cautious about driving perverse behaviours by ranking indicators – all our indicators of performance relate back to our corporate plan and our strategic goals unique to us – so whilst a baseline of indicators would help weed out potential outliers such a benchmarked approach can only ever be a can opener. The RSH own sector risk profile acknowledges the wide variance in performance based on risks such as geography, customer indices of multiple deprivation, regeneration and proximity to stock transfer date – so having the ability to flex to your customers' needs is crucial whilst understanding that the sector needs to ensure consumers quite rightly get a commonly accepted standard</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>22. Are there any other areas that should be covered?</b>	<ul style="list-style-type: none"> <li>At The Pioneer Group our social landlord <a href="#">CVCH</a> has engaged with and established a Community Pledge on Castle Vale that has given a 10 year commitment of £500k per annum of investment in non-core housing activities (added value activity important to its tenants such as community safety work and debt and benefit advice) – we would be keen to ensure organisations had the ability to flex their internal scorecard (KPI league table) to reflect choices like a community pledge – over and above a core set of KPI’s suggested – this cannot by its nature be designed and set nationally</li> </ul>
<b>23. Should landlords report performance against these key performance indicators every year?</b>	<ul style="list-style-type: none"> <li>Registered Providers already produce annual report to tenants and this method could be retained but could be strengthened through a review to broaden key reporting criteria expectations (through consumer standard) – the data expected (both qualitative and quantitative) qualitative input could be subject to regulatory standard or through negotiation with a national tenants body</li> </ul>
<b>24. Should landlords report performance against these key performance indicators to the Regulator?</b>	<ul style="list-style-type: none"> <li>Landlords are already likely to be reporting their performance (through KPI, complaints, annual tenants report) through their existing Governance structures – certainly this is done at The Pioneer Group – so it should be possible with a strengthened consumer standard for the Regulator to monitor and check through IDA or regulator returns – particularly if a league table of baseline KPI data is to be adopted</li> <li>If the role of tenant scrutiny is strengthened</li> </ul>
<b>25. What more can be done to encourage landlords to be more transparent with their residents?</b>	<ul style="list-style-type: none"> <li>A strengthening of the approach to both the Governance and Consumer Standards could bring greater transparency to tenants – landlords could be asked to ensure core customer facing activities are given greater prominence in the annual report to tenants and through published outcomes of tenant scrutiny activity (at present it is for landlords to design and respond to the tenant involvement and empowerment standard expectations which are clear around ‘accessible, relevant and timely information’ and ‘arrangements for tenant involvement and scrutiny’ – if the regulator had greater powers to intervene where evidence existed of systemic failure to meet the existing standards for a significant proportion of tenants the regulator could test this through complaints reporting and annual submissions</li> </ul>

QUESTION	COMMENTS/CONTEXT
<p><b>26. Do you think that there should be a better way of reporting the outcomes of landlords' complaint handling? How can this be made as clear and accessible as possible for residents?</b></p>	<ul style="list-style-type: none"> <li>At The Pioneer Group our social landlord CVCH publishes bi-annual complaints report to CVCH Board which covers complaints data across a series of metrics (complaint type, source, at what stage dealt with including escalation to tenant panel and Housing Ombudsman, satisfaction with handling and outcome and lessons learnt/actions taken). The report also analyses any emerging trends and we have linked to the annual 'perception' survey that regression analysis identifies areas of dissatisfaction and main triggers. We would be happy to publish this and share with our tenants</li> </ul>
<p><b>27. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?</b></p>	<ul style="list-style-type: none"> <li>The regulator should seek to co-design metrics with landlords through National Housing Federation and tenants through TPAS – then keep it simple against KPI's (like food hygiene star ratings – all food outlets have them from your local take away to 5* fine dining restaurants, consumers know what they mean, in social housing tenants often don't have a true consumer choice between providers so having a common well understand baseline is important) – it should then be for individual landlords to set wider metrics with their Boards and their customers – using the analogy above are tenants and Boards happy to be a takeaway or fine dining. League tables may drive perverse behaviours so keep them transparent and simple – HouseMark benchmarking is overly complicated and definitions too open to 'interpretation' – this can lead to a pull to the centre not a driver for true excellence. The sector has historically been too inward looking and should be setting its aspirations around consumer standards with best in the market not best in sector?</li> <li>It should be noted that Local Authority landlords do not face the same standards around regulation and this should be challenged particularly in light of the freeing up of HRA accounts and likely expansion is LA stock numbers</li> </ul>
<p><b>28. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective</b></p>	<ul style="list-style-type: none"> <li>The basic rating system described in response to question 27 would keep things transparent and simple – if you have a two star landlord both tenants and the regulator would want to know why you are two star and what you intend to do about it – every social landlord should be at 5* or working towards it.</li> <li>Publishing of performance indicators should be a can opener for tenants and the regulator – comparison between by their nature unique organisations is fraught with problems and could completely undermine the regulatory regime where the onus has rightly been on Boards (Governance) to ensure that</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>comparison of performance?</b>	<p>organisations make the right decisions for them and remain financially viable. The current system has served the sector reasonably well – a way of identifying outliers and understanding why not a move back to granular audit commission style homogeny</p>
<b>29. Should we introduce a new criterion to the Affordable Homes Programme that reflects residents' experience of their landlord?</b>	<ul style="list-style-type: none"> <li>• No – anything that has the potential to distract from meeting supply needs can't be a good thing – this would be a perverse way of regulating consumer standards, effectively punishing people who can't even get a tenancy. Existing regulatory regime has enough levers to influence landlord behaviour – any landlord who suffers significant regulatory downgrade will undoubtedly review its exposure to development risk (as would their funders)</li> </ul>
<b>30. What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?</b>	<ul style="list-style-type: none"> <li>• The current regulatory focus gives landlords a clear expectation that they are well governed and don't risk the investment from the public purse by ensuring they remaining financially viable. The consumer standards are robust but could have greater teeth with the lowering of the serious detriment test bar – at The Pioneer Group we place high value on being community led with tenant majority being retained on the CVCH Board and tenant elections that support Board membership. We have not lost sight of our charitable objects and voice of the customer remains a high priority. The regulator could test self assessments more robustly and seek out evidence of systemic failure of consumer standards</li> <li>• Tenants in the private rented sector and local authority tenants are not regulated to the same extent around consumer standards – the redrawing of common baselines across tenures would be useful from a consumer perspective</li> </ul>
<b>31. Are current resident engagement and scrutiny measures effective?</b>	<ul style="list-style-type: none"> <li>• The Pioneer Groups social landlord has redefined our approach to tenant engagement and moved away from 'traditional' top down bottom up structures – whilst we have retained elected tenant and residents majority on our CVCH Board we have a tree model of engagement that better suits our customer demographic and the way consumers choose to interact – our tenants can choose how much or how little they engage and by what methods – yes they can be heavily involved and seek election to a Board or they can fill in their annual tenants survey and a host of offers of engagement in between.</li> <li>• The tools of engagement also need to move with the times – technology plays a part and we are strengthening our social media offer to reflect this but also becoming more used to using customer insight rather as well as direct engagement (the notion that tenants want to be directly engaged is not evidenced</li> </ul>

QUESTION	COMMENTS/CONTEXT
	<p>so we increasingly use insight to build a picture of how best to shape and evolve services and offers to our tenants</p>
<p><b>32 What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?</b></p>	<ul style="list-style-type: none"> <li>• What problem are we trying to solve? Where is the evidence base that tells us tenants want to be more engaged – it is about having sound structures for this that want to engage and then ensuring the majority who won't want to engage have their needs met by gathering insight into their experiences – there will not be a one size fits all to this issue</li> <li>• A national body for tenants would help and the bar needs to be moved down from serious detriment with regulator seeking evidence that the voice of the customer is and can be heard</li> </ul>
<p><b>33. Is there a need for a stronger representation for residents at a national level?</b></p>	<ul style="list-style-type: none"> <li>• We have missed a trick as a sector by not filling a gap for ourselves, there is a need for local voices to be heard but that would not necessarily address the need to influence and lobby for national policy changes and voices that cut across tenures. Feels like there is an emerging appetite for some kind of national tenants voice</li> <li>• It should not take a tragedy like Grenfell to have an organisation like Grenfell United influencing national housing policy – the momentum now gathered needs not to be lost and this does feel like a turning point and opportunity to keep momentum to address what are national issues</li> </ul>
<p><b>34. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations?</b></p>	<ul style="list-style-type: none"> <li>• There is an appetite for community led housing and The Pioneer Group are at the forefront (along with other partners) of creating a Hub in Birmingham to promote community led housing initiatives and access community led housing funding – whilst not directly linked to the question asked it shows a real appetite to develop housing management and development solutions that break the traditional mould I responding to the national housing crisis</li> <li>• The Pioneer Group are also in preliminary negotiations with a Local Authority regarding the stewardship and management of some of their homes where we can provide local knowledge and expertise, streamlining existing services and presenting better VFM for the public.</li> </ul>



QUESTION	COMMENTS/CONTEXT
<b>35. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?</b>	<ul style="list-style-type: none"> <li>• Yes exploring models through trailblazers can only be a good thing – they would need to be clear as to what problem they are trying to solve and have locality as a focus</li> </ul>
<b>36. Are Tenant Management Organisations delivering positive outcomes for residents and landlords?</b>	<p>No comment</p>
<b>37. Are current processes for setting up and disbanding Tenant Management Organisations suitable? Do they achieve the right balance between residents' control and local accountability?</b>	<p>No comment</p>
<b>38. Are there any other innovative ways of giving social housing resident's greater choice and control over the services they receive from landlords?</b>	<ul style="list-style-type: none"> <li>• The Pioneer Groups social landlord CVCH have a well-established 'community pledge' that commits a minimum of £500k community investment per year to sustain regeneration on Castle Vale – tenants shape the investment and steer activity priorities each year. The notion of delegated budgets and control over investment decision is not new and has worked at housing providers previously</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>39. Do you think there are benefits to models that support residents to take on some of their own services?</b>	
<b>40. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?</b>	<ul style="list-style-type: none"> <li>• Whilst procurement can make this more problematic getting customers involved in procurement is possible and can add real value – we have successfully engaged tenants and residents in procurement for customer facing services such as repairs and grounds maintenance</li> <li>• We do not always (as a sector) extract from contracts added value – CSR/social value returns commensurate the contract values – this is an area that the sector can and should be doing more to promote</li> <li>• Retaining contractual control and ultimate responsibility for contracted services rests with the organisation and any move to dilute this without regard to safeguarding for instance financial viability could be difficult</li> </ul>
<b>41. What more could we do to help leaseholders of a social housing landlord?</b>	<ul style="list-style-type: none"> <li>• Leaseholders do crave greater clarity on how service charges are calculated including the yearly increase – consistency across the sector would be helpful</li> <li>• Leaseholders can be frustrated regards ensuring VFM in procurement of services that they ultimately pay for – greater transparency in this area would be welcomed (whilst existing Section 21 notices etc. apply these are not widely understood) by leaseholders and greater incentives for landlords to drive down costs without compromising quality should be sought</li> <li>• Options to explore support for individual leaseholders who face financial difficulties e.g. payment plans, payment breaks etc.</li> <li>• The area of sinking funds is also poorly understood and can lack consistency between landlords in the sector can some additional guidance/charter be developed</li> <li>• The Pioneer Group have a well established leaseholder forum and developed a leaseholder handbook to bust myths and create greater clarity – we are currently developing a dedicated area on website where payments can be made, information relating to major works and any relevant news/updates on leaseholder matters can be shared</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>42. Does the Regulator have the right objective on consumer regulation?</b>	<ul style="list-style-type: none"> <li>Broadly yes the consumer objectives set out are clear, the one area mentioned in the green paper is around when things go wrong (complaints/redress) – this could be an additional specific point expanding on the notion of ‘protection’ covered in the existing objectives</li> </ul>
<b>43. Should any of the consumer standards change to ensure that landlords provide a better service for residents in line with the new key performance indicators proposed?</b>	<ul style="list-style-type: none"> <li>The current standards cover the main areas of operational activity and straying beyond these from a regulatory point of view would be potentially problematic – the current regulatory framework would need to be changed considerably away from its focus on leadership in governance – regulating corporate culture is difficult and the current standards should provide an adequate insight into an organisations relationship between Board, Exec and Customers if utilised in the right way</li> </ul>
<b>44. Should the Regulator be given powers to produce other documents, such as a Code of Practice, to provide further clarity about what is expected from the consumer standards?</b>	<ul style="list-style-type: none"> <li>Yes – to create a sensible ‘baseline’ of consumer standards KPI along code of practice – though these can be co-created with the sector and tenant bodies (new or existing)</li> <li>Anything more granular risks both operational interference with little tangible gain and the need to have significant investment in the Regulatory Resource (which social landlords now pay for which in turn takes resource away from supply and operational services)</li> </ul>
<b>45. Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards?</b>	<ul style="list-style-type: none"> <li>The bar is potentially set too high but any lowering of the bar needs to take account of the resource implications for the regulator (and in turn the sector who pay for regulation).</li> <li>The creation of baseline consumer standards (a restaurant style food hygiene rating) should be enough to create line of enquiry through existing regulatory route (through Board governance) – regulatory returns and IDA</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>46. Should the Regulator adopt a more proactive approach to regulation of consumer standards?</b>	<ul style="list-style-type: none"> <li>• Yes I think the regulator has scope through IDA regime to see how Board seek assurance on consumer standards – voice of the customer, satisfaction, complaints etc.</li> <li>• The Pioneer Group has recently starting producing a voice of the customer report for Boards which captures how we are hearing from our customers – through engagement, transactional and perception surveys and customer insight – the Regulator could mandate a similar approach and Boards can shape it to suit their customers</li> </ul>
<b>47. Should the Regulator use key performance indicators and phased interventions as a means to identify and tackle poor performance against these consumer standards?</b>	<ul style="list-style-type: none"> <li>• Broadly in agreement - indicators are only ever a can opener – they can test how Boards have responded to deteriorating PI's on consumer standards – satisfaction across the sector is not disproportionately low and Boards are more than capable of setting standards particular to their organisations circumstances, however where evidence emerges of systemic failure then the regulator should have the power to intervene more promptly than a four year IDA – if metrics can be devised to allow for analysis through returns this could be explored</li> </ul>
<b>48. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords?</b>	<p>Yes – consumers in the tenanted sector should have a clear sense of basic standards they can expect regardless of landlord/tenure. However the regulatory resource and capacity to deliver an aspiration needs to be addressed.</p>
<b>49. Are the existing enforcement measures described above adequate? (e.g. survey , inspection enforcement, fines, compensation removal of officers (full list on green paper at page 42</b>	<p>If the regulator aims to create parity between private, social and local authority providers then its tools and powers should be the same regardless of landlord – this principle however would be hard to deliver without a huge burden on the existing regulator. The reality for many cash strapped Local Authorities is they would struggle to respond to powers being exercised in any event.</p>
<b>50. Is the current framework for local</b>	<p>No comment</p>

QUESTION	COMMENTS/CONTEXT
<p><b>authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust?</b></p>	
<p><b>51. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?</b></p>	<ul style="list-style-type: none"> <li>• If the Regulator remains accountable through a Minister that would seem sufficient – though as social landlords pay for the regulator what accountability around performance is available – do we have access to the outcomes of functional and tailored reviews?</li> </ul>
<p><b>52. How could we support or deliver a best neighbourhood competition?</b></p>	<ul style="list-style-type: none"> <li>• The Pioneer Groups social landlord CVCH is internationally recognised for its role as an anchor organisation in a model of sustained regeneration and has through the Neighbourhood Partnership Board recently launched the third neighbourhood plan – now spanning over 25 years of neighbourhood planning – key this this success is engagement with the whole neighbourhood and recognising the strengths in our communities. <a href="#">SGOHT</a> already runs a community awards that recognises the people in that community in Stockland Green that make that neighbourhood thrive. The idea of a competition is one approach but our communities would rather see public monies put into capacity building and efforts to sustain stretched community resources</li> </ul>
<p><b>53. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?</b></p>	<ul style="list-style-type: none"> <li>• The National Housing Federation as the lobbying body for the social housing sector and together with Chartered Institute of Housing and organisations like TPAS would be more than capable of supporting a national campaign to have a strengths based conversation about the amazing tenants we house and organisations we support that make our communities great – the narrative is all too often about replaying stereotypes and focussing on communities deficits not their strengths (indices of multiple deprivation exists and they are real but they are one part of a story)</li> </ul>

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	<ul style="list-style-type: none"> <li>Brexit was undoubtedly about many things but it was definitely about marginalised, disenfranchised communities a million miles away from the Westminster bubble – the communities we work with and people we house have many more positive stories to tell if given the space and resource to tell them</li> </ul>
<p><b>54. What is needed to further encourage the professionalization of housing management to ensure all staff delivers a good quality of service?</b></p>	<ul style="list-style-type: none"> <li>Social housing is an incredibly diverse sector with professional qualifications available in housing (through CIH) to trades qualifications and many more – the sector is slowly being recognised as a chosen profession with graduate recruitment bringing new people in who have a desire to give something back to society – the sector needs to build on this.</li> <li>Customers service is about well trained staff but it's also about creating a corporate culture that puts the customer at its heart – the stories we have to tell about our diverse work and difference we make will attract the right people to the sector</li> </ul>
<p><b>55. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?</b></p>	<ul style="list-style-type: none"> <li>Hard to define a single national metric – any PI should only be a can opener not a blunt instrument. The regulators own sector risk profile regression analysis shows it's harder (more expensive) to work in regeneration areas with MID) – so headline perception surveys can be used but only to then challenge Boards to understand what the local issues and remedies are?</li> <li>The Pioneer Group have invested in a modelling tool (used widely in the sector) that presents a net present value model and influencers on the NPV rating – both quantitative and qualitative – this is a helpful can opener for us and influences stock investment and housing management decisions but it is hard to see how this could be a national metric when the variables are so localised – tenancy turnover and customer satisfaction are broad measures with many variable factors underlying them</li> <li>Perception surveys such as Net Promoter Scores are being used more widely in the sector but again these can only be viewed as a can opener and would need agreement on consistency questioning of neighbourhood management (and how it is defined) at a national level</li> </ul>
<p><b>56. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities?</b></p>	<ul style="list-style-type: none"> <li>The Pioneer Group has an incredibly rich legacy and current activity of partnership working through Neighbourhood Partnership to sustain regeneration investment at Castle Vale through to more recent partnerships in new communities in Stockland Green and Sutton Coldfield</li> <li>Our activities cover a wide range of activities including but not limited to community safety, health, education, financial and digital inclusion, employment and enterprise. We provide anchor organisation status in key communities in which we work and develop partnerships that impact far beyond our core</li> </ul>

QUESTION	COMMENTS/CONTEXT
	<p>role of high quality housing for those in social need – including intervening in market rent and homes for sale</p> <ul style="list-style-type: none"> <li>• Social landlords like ourselves play a crucial role in dealing with people threatened with or who are already homeless and prevent homelessness through our work to sustain tenancies</li> </ul>
<p><b>57. Should landlords report on the social value they deliver?</b></p>	<ul style="list-style-type: none"> <li>• Within The Pioneer Group <a href="#">Compass Support</a> (our people based charity) has a long history of reporting on its social value and we continue to explore how activities across the Group can add demonstrable social value – to date the sector has not adopted a single tool/set of metrics which would be required for any kind of benchmarking to add value</li> </ul>
<p><b>58. How are landlords working with local partners to tackle anti-social behaviour?</b></p>	<ul style="list-style-type: none"> <li>• Social landlords have a long history of working in partnership with a range of statutory and non-statutory agencies and partners to tackle anti-social behaviour (and broad community safety issues)</li> <li>• The Pioneer Group has identified local customer led demand and responded directly to concerns around community safety through partnership locally e.g. housing the West Midlands Police neighbourhood policing team in one of our building when the local police station closed through to investment through a community pledge to run a CCTV service and resident led community safety radio network</li> <li>• The Pioneer Group is a partner of Birmingham Social Housing Partnership and supports community safety partnerships with Birmingham City Council and West Midlands Police – we have also hosted a partnership co-ordinator and facilitated practitioner and leadership groups to focus on community safety across the City</li> <li>• The Group sees all the above partnership activity as core to delivering neighbourhood management – creating safe communities helps us to sustain tenancies</li> </ul>
<p><b>59. What key performance indicator could be used to measure this work?</b></p>	<ul style="list-style-type: none"> <li>• Currently measure satisfaction with ASB case work – outcome and handling along with other landlords who contribute to Housemark benchmarking</li> <li>• We monitor crime statistics and report these through our work with the neighbourhood partnership board and local tasking group (tasking group identifies hotspots and tasks partners to deal with and address issues and emerging trend data)</li> <li>• We measure tenant perception of community safety through our annual tenants satisfaction survey – this links to action plans to address concerns raised</li> </ul>

QUESTION	COMMENTS/CONTEXT
<b>60. What other ways can planning guidance support good design in the social sector?</b>	<ul style="list-style-type: none"> <li>• Guidance that supports greater tenant and resident engagement in place based (neighbourhood) design should be encouraged</li> </ul>
<b>61. How can we encourage social housing residents to be involved in the planning and design of new developments?</b>	<ul style="list-style-type: none"> <li>• Create space to learn lessons from existing new developments – so failure in design is not repeated</li> <li>• Encourage through planning guidance tenant and resident engagement in scheme design – open and transparent consultation at pre planning stages are no uncommon but could be strengthened particularly on mixed use developments</li> <li>• The significant shift in policy and funding towards community led housing will encourage greater engagement end to end of development processes – how can the best of this practice be captured and shared with developers and what incentives can developers be given to engage with communities they are building and interacting with beyond the social housing sector</li> </ul>
<b>62. Recognising the need for fiscal responsibility, this Green Paper seeks views on whether the government's current arrangements strike the right balance between providing grant funding for Housing Associations and Housing Revenue Account borrowing for Local Authorities</b>	<ul style="list-style-type: none"> <li>• From a social landlord perspective operating in regeneration areas and areas with indices of multiple deprivation certainty of rental income is important in ensuring we can meet our fair share of the housing crisis the country faces AND invest in sustaining the communities in which we work through added value activities</li> <li>• By expanding our development programme we increase risk and lack of certainty of income only exacerbates that risk – particularly with a steady decline in grant subsidy and shrinking in long term finance capacity available to the sector</li> <li>• The country needs a comprehensive response to housing crisis and it is welcomed that social housing along with LA housing is being seen as part of the solution once again (rather than part of the problem) – large scale and small scale e.g. community led housing and hard to tackle small sites, will all be required if we are to meet house build targets – grant rates need to reflect the flexibility and complexity of the challenge the sector faces particularly in brownfield sites or high value land value areas or complex build for the elderly – deals with local areas and revision of NPPF welcomed</li> <li>• Steps taken to guarantee rent settlement; affordable housing guarantee scheme are to be welcomed and The Pioneer Group have accessed The New Ways of Working through MATRIC Partnership Wave 1</li> </ul>
<b>63. How we can boost community led housing and overcome the barriers communities</b>	<ul style="list-style-type: none"> <li>• TBC</li> </ul>



QUESTION	COMMENTS/CONTEXT
<p>experience to developing new community owned homes?</p>	
<p><b>64. What level of additional affordable housing, over existing investment plans, could be delivered by social housing providers if they were given longer term certainty over funding?</b></p>	<ul style="list-style-type: none"> <li>• Hard to give a specific figure – we have committed to additional units through Wave 1 new ways of working and felt confidence in doing so given higher negotiated grant rates and longer term certainty of programme funding BUT delivery is about more than grant (given grant is still minority of new delivery costs) – availability and cost of land; remediation costs and development finance are amongst a range of determining factors beyond grant rates</li> <li>• Proposed reintroduction of the Affordable Housing (private lender) Guarantee Scheme to aid small and medium sized providers who are less well placed than larger associations to access capital markets is something we would welcome and explore</li> <li>• Keen to explore ‘social investment’ routes – finance available to social landlords like ourselves that place particular focus on neighbourhood and social focus (to supplement commercial investment finance) would be welcomed</li> </ul>
<p><b>65. How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?</b></p>	<ul style="list-style-type: none"> <li>• Reduce the minimum 10% staircasing requirement which can be a deterrent</li> <li>• Encourage lenders (impose a fees cap) to review how they structure fees being and legal each time the owner staircases</li> </ul>