



Regulator of
Social Housing

Consumer Regulation Review 2023-24

July 2024

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1. Foreword

- 1.1 This report sets out the key themes from our consumer regulation casework over the last year (2023-24). It provides important lessons for all social landlords – including local authorities, housing associations and other private registered providers. It is designed to help them learn from the experience of others, so they can strengthen their own approach to delivering the outcomes in our consumer standards.
- 1.2 On 1 April 2024 we introduced significant changes to the way we regulate social landlords. The changes are a result of the Social Housing (Regulation) Act 2023 and include our regular, proactive, inspections of landlords with 1,000 or more homes, new consumer standards and a range of other tools including Tenant Satisfaction Measures and new powers.
- 1.3 This review covers the 12 month period before we began our new regulatory approach when we could not intervene unless we had reasonable grounds to suspect that by not meeting the consumer standards a landlord had caused, or could cause, serious detriment to tenants. However the findings are still highly relevant and all landlords should read and learn from this report. The lessons in this report will help landlords to deliver the outcomes in our new consumer standards too.
- 1.4 The case studies set out in this review demonstrate the following important points:
 - Landlords must meet all health and safety requirements to keep tenants safe
 - Landlords must know the condition of the homes they own and manage
 - Landlords must handle complaints effectively
 - Landlords must engage effectively with tenants and treat them with fairness and respect
- 1.5 During 2023-24, we received 986 referrals from tenants, landlords and other sources in relation to the consumer standards; an increase of 5% from the previous year. We assessed each of these referrals, and where appropriate, we signposted tenants to the Housing Ombudsman to have their individual complaint addressed. We investigated 217 referrals and found 9 landlords not meeting the consumer standards.
- 1.6 In this review we highlight the importance of landlords referring themselves to us when they find a problem. This is a cornerstone of our regulation and is now a requirement of the new consumer standards. Landlords need to continually assure themselves that

they are delivering the outcomes we have set. When they find a material issue (or a potential one), they must tell us promptly and we will engage constructively as they work to put things right.

- 1.7 We know that most landlords take their responsibilities seriously and are providing safe and decent homes for tenants. But as the cases in this review show, some landlords are failing to do so. Added to this, some landlords failed to refer themselves to us in relation to serious health and safety issues. We now have a wider range of tools to assess landlords' performance and stronger powers when we need to use them to drive landlords to improve.
- 1.8 We are getting on and delivering our new role, including our programme of inspections, to drive landlords to deliver long-term improvements for the benefit of tenants. All social landlords should consider the lessons in this report as part of their ongoing work to improve tenants' homes and services.

Fiona MacGregor
Chief Executive

2. Key lessons for landlords

- 2.1 Through our responsive consumer regulation work in 2023-24 we identified a number of key themes relevant to all landlords. The consumer standards changed in April 2024, but the lessons and learning still apply. Landlords should take account of these as part of their ongoing work to meet the required outcomes of the new consumer standards.

Landlords must meet all health and safety requirements to keep tenants safe

- 2.2 Our investigations revealed that some landlords failed to meet the Home Standard. In the new Safety and Quality Standard it remains an essential responsibility of landlords to ensure tenants' homes are safe. This includes completing all required safety assessments and checks, and also completing all remedial actions identified. In 2023-24, all of the cases where we found landlords were not meeting the Home Standard involved a failure to meet legal health and safety requirements.
- 2.3 In different cases we found landlords had not completed required assessments and checks for fire, gas, electrical, asbestos and water safety. We also found landlords who could not provide assurance that all required homes had smoke alarms and carbon monoxide detectors, which became a requirement in October 2022. In a number of the cases, we found the required fire risk assessments had been completed, but the remedial actions identified in the assessments had not been completed within the timescales specified, including actions which had been designated as high risk actions.
- 2.4 In 2023-24, our investigations of how landlords were managing damp and mould showed a need for landlords to take a broader approach to keeping tenants safe that goes beyond legal health and safety checks. This includes having a proactive approach to identifying damp and mould, and acting in a timely way to resolve issues when tenants report it. In doing so it is important that landlords understand their tenants' needs and take account of them when assessing the risks from damp and mould. Landlords must learn from the tragic case of Awaab Ishak, a two-year old boy who died due to exposure to mould in his home.

Landlords must know the condition of the homes they manage

- 2.5 In 2023-24, we found examples of landlords who did not have accurate, up-to-date and complete data on the condition of the homes they owned and the risks these presented to tenants. The Safety and Quality Standard has introduced a new requirement for landlords to have accurate stock condition information on every home based on a physical assessment.

- 2.6 Landlords need to have a good understanding of the quality of homes they provide. This is essential for assuring themselves that they are meeting the requirements of the Decent Homes Standard. In 2023-24, we found landlords who had a significant number of homes not meeting the Decent Homes Standard or the landlord did not have the data to be assured that homes were meeting the Decent Homes Standard. Landlords must ensure tenants' homes meet, and are maintained to, at least this standard. This must include using the Housing Health and Safety Rating System to assess the severity of risks to tenants from any hazards present in their home.
- 2.7 Fundamentally, we expect landlords to have effective systems and reliable information on the condition and quality of the homes they manage and ensure they use this to provide good quality, well-maintained and safe homes for tenants.

Landlords must handle complaints effectively

- 2.8 All landlords must ensure complaints are addressed fairly, effectively, and promptly. In 2023-24, a Housing Ombudsman report highlighted issues with how a landlord had handled a number of individual complaints. We found that the landlord was failing to adequately handle complaints and was therefore not meeting the requirements of the Tenant Involvement and Empowerment Standard.
- 2.9 Our new Transparency, Influence and Accountability Standard (which replaced the Tenant Involvement and Empowerment Standard), requires landlords to have a simple, accessible and publicised complaints process, and for landlords to provide tenants with information about how to make a complaint. Complaints can provide an important source of insight and intelligence for landlords about how their systems are working, and handling complaints effectively can help build tenants' trust and confidence in their landlord. In order to treat tenants fairly and with respect, landlords must also have the systems to learn from complaints when things go wrong.

Landlords must engage effectively with their tenants

- 2.10 We know from our work with landlords that the sector has room for improvement when it comes to engaging with tenants in a meaningful and impactful way. We require landlords to take tenants' views into account in their decision-making and let tenants know how their views have been considered. Through our programme of planned inspections, we will look for evidence that tenants are empowered to lead engagement opportunities and self-direct how they scrutinise their landlord.

All landlords must meet the required outcomes of the new consumer standards

- 2.11 Regardless of who their landlord is, all tenants deserve to live in a safe and good quality home and receive good landlord services. In 2023-24, all of the 9 landlords that we

found were not meeting the requirements of the consumer standards were local authorities. Landlords must deliver the outcomes in our consumer standards and, in line with our co-regulatory approach, we will hold boards and councillors to account for the outcomes that they deliver. We expect boards and councillors to understand the required outcomes of the consumer standards, have good oversight and scrutiny of performance, and when issues occur, ensure that plans are in place to put things right and prevent them from happening again.

- 2.12 In April 2024, we started our programme of inspections and landlords with 1,000 or more homes should expect to be inspected within the next four years, although we may also carry out inspections outside of this programme, for example to seek evidence where we suspect there is a serious failure at a landlord to deliver the outcomes of our standards. Landlords should already be prepared for the new consumer standards, and they should be continuing to look at how they are delivering the outcomes of the standards. Where there are gaps, they must act now to ensure they are delivering the outcomes of the standards, and they should tell us if they are not doing so.

3. Working effectively with the regulator to make improvements

- 3.1 When a landlord identifies an issue that impacts its delivery of the outcomes of our standards, we expect landlords to be open and transparent with us by making a self-referral at the earliest opportunity. In the cases where we find a landlord is not meeting the requirements of the consumer standards, and we publish our judgement, we engage with the landlord until the issues have been resolved.
- 3.2 Landlords who have successfully resolved their issues have taken early action to understand the root causes of what they are trying to resolve. This goes beyond simply addressing the presenting issues, for example completing outstanding health and safety checks or reducing a backlog of complaints. It is about fully understanding the underlying issues so that a coherent improvement plan can be implemented. Where new issues are identified through the work to discover the root causes, it is important that the landlord is transparent with us and lets us know early.
- 3.3 We have seen that landlords that engage effectively with us have positive engagement from senior leaders, including chief executives, councillors and board members. This provides us with assurance that there is a recognition of the seriousness of the issues and that there is senior oversight and scrutiny of the improvement work. We have also seen examples where landlords have sought independent oversight of improvement work to ensure its effectiveness.
- 3.4 In the last year, 10 landlords delivered the required improvements and we withdrew the Regulatory Notices that had been in place. The example below sets out how one of those landlords engaged constructively with us and put effective arrangements in place to deliver the outcomes of the consumer standards.

Norwich City Council

In 2021, Norwich City Council (the council) made a self-referral as it had identified it was not meeting its legal health and safety responsibilities. Following our investigation, we found the council was not meeting the requirements of the Home Standard as the council had failed to meet legal requirements for fire, electrical, asbestos and water safety. We then started a period of intensive engagement with the council.

The council had investigated the root causes of what went wrong and so it had a good understanding of why the issues had arisen and what was needed to drive improvements. The council was also transparent with us when additional compliance gaps were identified. It agreed a voluntary undertaking¹ with us that set out the action the council committed to take to resolve the issues. This set out a clear path to address the issues and included independent validation of its progress. It established oversight arrangements which included independent experts to oversee its delivery against the voluntary undertaking.

We engaged with the council as it completed the necessary works, mitigated safety risks to tenants, and strengthened its approach to managing landlord health and safety. The council engaged positively and constructively with us and provided us with regular and comprehensive updates which allowed us to monitor actions and progress. At the end of the process, the council sought external assurance around the effectiveness of the improvements made.

As a result of this positive engagement, the detailed improvement plans and reporting, strengthened governance arrangements, and independent oversight, the council was able to demonstrate that it had resolved the issues and was meeting the required outcomes of the standards. We removed the Regulatory Notice in December 2023.

¹ A voluntary undertaking (set out in Section 125 of the Housing and Regeneration Act 2018) is a means by which a landlord can formally commit to taking action to make improvements.

4. The Home Standard

- 4.1 The Home Standard (which has now been replaced with the Safety and Quality Standard) required landlords to provide homes of a decent quality, and to have an effective repairs and maintenance service which responds to the needs of tenants. It also required landlords to meet statutory requirements to provide for the health and safety of tenants within their homes. The Safety and Quality Standard includes similar requirements, and also requires landlords to have accurate, up to date and evidenced understanding of the condition of their homes.
- 4.2 In all of the cases summarised below, we found landlords were not meeting the Home Standard and had met the serious detriment test by risking serious harm to tenants.

Decent Homes Standard, stock condition and repairs

- 4.3 The case summary below sets out the details of two cases where the landlords did not have effective systems and reliable information on the quality of their homes. In one case, tenants were also waiting too long for repairs to their homes to be completed. Both cases included failures to meet health and safety requirements and we concluded that the landlords were not meeting the Home Standard and that there had been a risk of serious detriment to tenants.

Case summaries - stock quality and repairs

We received self-referrals from Adur District Council (Adur DC) and the London Borough of Lewisham (LB Lewisham) identifying potential failures to meet the minimum quality standards required for their homes.

Adur DC told us it could not evidence what proportion of its homes met the Decent Homes Standard, as it did not hold full or accurate data in this area. Following our investigation, we concluded that Adur DC did not have an effective system in place to allow it to meet its responsibilities in relation to the quality of its homes. This was in addition to failings to meet a range of landlord health and safety requirements.

In relation to the quality of its homes, LB Lewisham reported that 17% of its homes did not meet the Decent Homes Standard, however, this was based on incomplete information. LB Lewisham was carrying out a stock condition survey of all of its homes so it could develop a plan to reduce the number of homes not meeting the Decent Homes Standard.

LB Lewisham was also failing to provide a cost-effective repairs service by not rectifying repairs issues reported by tenants in a timely way. We found that it had 18,000 repairs in progress and that less than 55% of repairs were completed on time. The time tenants had to wait for a repair to be completed was significantly more than the timescale set out in LB Lewisham's service standards.

We concluded that both landlords were not meeting the Home Standard and that there was a risk to tenants that met the serious detriment test. In both cases, the landlords have put plans in place to improve their systems and stock information as part of their action to rectify the failures. LB Lewisham also has a transformation plan to improve its repairs service. We are continuing to engage intensively with both councils as they deliver their plans.

Failure to meet legal health and safety requirements

- 4.4 In all of the cases in 2023-24 where we identified a failure to meet the Home Standard, we found there had been failure to meet all legal health and safety requirements. The case summary below highlights three landlords that failed to meet their legal responsibilities to complete the relevant safety tests and assessments. This left a significant number of tenants at risk of serious harm and we concluded that this met the serious detriment test and that the landlords were not meeting the Home Standard.

Case summaries – failure to meet legal health and safety requirements

We investigated Dudley Metropolitan Borough Council (Dudley MBC), the London Borough of Harrow (LB Harrow) and Wigan Council for potential failures to meet legal health and safety requirements.

Dudley MBC reported that more than 300 homes were overdue a gas safety inspection, there were 500 outstanding fire risk assessments and 8,000 overdue fire remedial actions, around 4,000 homes had not had an electrical inspection within the last 10 years, and around 500 communal asbestos inspections were overdue.

In relation to LB Harrow, we found that it did not have valid electrical condition reports for 3,500 of its homes and valid water safety risk assessments in place for a number of homes.

Through our engagement work with Wigan Council, we found it had more than 1,000 homes with overdue gas safety inspections, 60 overdue fire risk assessments and more than 800 overdue fire remedial actions, 275 homes did not have electrical inspection certificates and 10,000 homes still needed carbon monoxide detectors fitting.

We published Regulatory Notices for these councils in 2023.

Each of these landlords has since taken steps to meet their landlord health and safety requirements and overdue remedial actions. We continue to monitor their progress through intensive engagement with each landlord. Our work with the councils includes seeking assurance and evidence that the outstanding works are being addressed in a prompt and risk-based way, including ensuring that risks to tenants are managed and mitigated.

- 4.5 As well as completing all safety testing and assessments, it is important that landlords complete safety actions identified during those tests and assessments in order to rectify issues and remove risks to keep tenants safe. Since April 2024, this is a requirement of the Safety and Quality Standard. The case summary below highlights three landlords which had completed the required risk assessments but had not completed the actions identified in a timely way. Some of the actions had been assessed as being high risk, with a shorter time to complete them, yet were overdue. This left a significant number of tenants at risk of serious harm and we concluded that this met the serious detriment test and that the landlords were not meeting the Home Standard.

***Case summaries – failure to complete actions
from health and safety tests and assessments***

We investigated the London Borough of Camden (LB Camden), Kirklees Metropolitan Borough Council (Kirklees MBC) and Woking Borough Council (Woking BC) for potential failures to meet legal health and safety requirements and to complete follow-on remedial works.

The LB Camden, Kirklees MBC and Woking BC each had a high number of actions from fire risk assessments which had not been completed in a timely way. We found at the LB Camden that over 9,000 fire remedial actions were overdue, with around 1,500 of them being overdue since 2020. We found just under 400 of the actions

were high-risk actions, with a third of these due to have been completed within 10 days.

Our investigation of Kirklees MBC found more than 20,000 fire remedial actions from fire risk assessments were overdue of which more than 200 were high-risk actions.

At Woking BC, we found it did not have effective systems and reliable information to monitor its fire safety remedial actions which meant that 400 high risk actions had become overdue, half of which were very high priority.

Each of these landlords have since taken steps to meet their landlord health and safety requirements and overdue remedial actions. We continue to monitor their progress through intensive engagement with each landlord. Through this engagement, we are seeking evidence that the councils understand what went wrong, that they have plans in place to address the issues effectively, and that any risks to tenants are mitigated during this period.

5. The Tenant Involvement and Empowerment Standard

- 5.1 The Tenant Involvement and Empowerment Standard required landlords to treat tenants with fairness and respect, take account of the diverse needs of tenants and resolve complaints promptly, politely and fairly. This has now been replaced by the Transparency, Influence and Accountability Standard which includes a number of changes and additional requirements including for landlords to collect Tenant Satisfaction Measures.
- 5.2 In 2023-24, we introduced the Tenant Satisfaction Measures which include questions which landlords are required to ask their tenants in surveys about whether tenants consider their landlords listen to them and treat them with respect. Landlords are required to publish the outcome of the surveys it has completed this year. The case summary below highlights the importance that landlords should place on treating tenants fairly when handling complaints.

Case summary - fairness and complaints handling

Following the Housing Ombudsman's Special Report on Birmingham City Council's complaints handling, we investigated whether the council was meeting the requirements of the consumer standards. Through our investigation we identified that, alongside failures to meet the requirements of the Home Standard, the council had also failed to handle complaints effectively and failed to treat tenants with fairness and respect.

The Housing Ombudsman's Special Report identified fundamental flaws in the council's complaints handling, including poor record keeping, poor communication and a failure to learn from complaints. Through our investigation we found that more than 1,000 complaints (around 60% of open complaints) were overdue. In relation to the council's engagement with tenants, our investigation also identified that external reviews carried out in 2021 and 2022 found there was a lack of proactive, frequent and effective communication with tenants. The reviews also found that tenants' needs were not understood, and they did not feel valued. The council had not implemented the recommendations from the external reviews.

We concluded that the council had failed to treat tenants with fairness and respect, and in particular, had failed to provide an effective process for tenants to raise complaints.

The council put in place a programme to rectify these failures, and we are continuing to work intensively with the council as it resolves these issues. Our engagement includes working with the council to ensure it develops effective systems to handle complaints in a prompt and fair way, as well as ensuring it develops an effective approach to tenant engagement which demonstrates that tenants are treated fairly and respect, and that tenants' voices can be heard by the council. We will maintain that engagement until the council can provide assurance it meets the requirements of the consumer standards.

6. The Neighbourhood and Community Standard

- 6.1 The Neighbourhood and Community Standard covered neighbourhood management, local area co-operation and anti-social behaviour. The new Neighbourhood and Community Standard now also includes requirements in relation to domestic abuse.
- 6.2 Anti-social behaviour can have a great impact on peoples' lives and the neighbourhoods they live in, so it is essential that landlords have the systems and processes to manage reports of anti-social behaviour. Landlords must work with other agencies to prevent and tackle anti-social behaviour, and to provide support for victims and witnesses.
- 6.3 We received comparatively few referrals relating to the Neighbourhood and Community Standard and did not find any cases where landlords were not meeting the standard in 2023-24. The summary below shows a referral we investigated but found the landlord was meeting the requirements of the standard. In this case we found that the landlord had improved its working with partner agencies on anti-social behaviour.

Case summary - working with partners to manage anti-social behaviour

We received a referral from a local authority on behalf of its multi-agency partnership that co-ordinated action to resolve complex anti-social behaviour cases. The referral raised concerns over a housing association's lack of engagement with the partnership. The local authority told us that this had slowed the progress in resolving anti-social behaviour and provided us with an example where a lack of engagement by the landlord contributed to delays in a vulnerable care leaver being able to return home.

Our investigation found that the landlord was dealing with this complex case and liaising with relevant partners, which is why we concluded that it was meeting the Neighbourhood and Community Standard. However, the landlord told us that it had experienced difficulties in obtaining information from partners and accepted it could have done more to escalate its request for information and provide a named contact to relevant partners. We recognised that the landlord could implement some improvements to help in handling these types of complex cases, but we did not see evidence that the landlord's overall approach to managing anti-social behaviour was failing to meet the requirements of the standard.

However, as a result of this case, the landlord has strengthened its working arrangements with partner agencies by building more constructive operational relationships to improve outcomes to tenants experiencing anti-social behaviour.

7. The Tenancy Standard

- 7.1 The Tenancy Standard required landlords to ensure that their homes are let in a fair, transparent and efficient way, and to offer tenancies which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock. The Tenancy Standard also required landlords to enable their tenants to access opportunities to exchange their tenancy with that of another tenant and co-operate with local authorities to help them meet their strategic housing function. The new Tenancy Standard still includes these requirements but has changes including requirements in relation to tenancy sustainment and eviction.
- 7.2 We received comparatively few referrals relating to the Tenancy Standard, and we did not find any cases where its requirements were not being met in 2023-24. However, the case summary below shows the importance of landlords having effective mutual exchange processes.

Case summary - mutual exchange

We received a referral raising concerns about a backlog of mutual exchanges at a landlord and a pause in dealing with new mutual exchange applications.

Our investigation found that the landlord had not accepted new applications for mutual exchanges over a ten-week period, in order to clear a backlog caused by an increase in applications and capacity issues.

The landlord informed tenants of its action through its website, maintained its subscription to an online mutual exchange service, and processed urgent applications. However, we concluded that during the ten-week pause, most tenants could not access opportunities to exchange their tenancy in a timely manner and that the landlord had not informed us of these matters.

The landlord made improvements to its mutual exchange process and systems after undertaking an end-to-end review, recruiting additional staff to boost its capacity, and strengthening its performance monitoring; all of which accelerated its mutual exchange completions. Taking into account the relatively short duration of the issue, as well as the steps the landlord had subsequently taken to address the issues, we did not find a failure to meet the requirements of the Tenancy Standard.

Annex A – Summary of our role and how we regulate

Our role is to regulate for a viable, efficient, and well governed social housing sector able to deliver quality homes and services for current and future tenants.

We regulate at the landlord level to ensure landlords drive improvement in how they operate. By landlord we mean a registered provider of social housing. These can either be local authorities or private registered providers such as non-profit housing associations, co-operatives, or profit-making organisations.

Since April 2024, our new consumer standards set out the outcomes that landlords must deliver. These are:

- Safety and Quality Standard;
- Transparency, Influence and Accountability Standard;
- Tenancy Standard; and
- Neighbourhood and Community Standard.

Delivering the outcomes of the consumer standards apply to all landlords registered with us, including local authorities, and include both the required outcomes and specific expectations we set. Where we find there are significant failures in landlords which we consider to be material to the landlord's delivery of those outcomes, we hold them to account.

We have a different role for regulating local authorities than for other landlords. This is because we have a narrower role for local authorities and the Governance and Financial Viability Standard, and Value for Money Standard do not apply. Further details on our regulatory approach are set out on our website in 'How we regulate'.²

² <https://www.gov.uk/government/collections/how-we-regulate>

Annex B – Analysis of cases

Referrals by stage

In 2023-24, our consumer regulation process had three stages:

- Stage 1: an initial review by the Referrals and Regulatory Enquiries team who reviewed all incoming enquiries.
- Stage 2: a more detailed review by the Consumer Regulation Panel to determine whether there was evidence of the requirements of the standards not being met.
- Stage 3: an investigation in cases where the requirements of the standards may not be met, or if there was a suggestion that tenants are at risk of serious harm.

The table below shows the total number of consumer regulation referrals handled by us in 2023-24 at each stage. The 2022-23 figures are also given for comparison purposes.

	2023-24	2022-23
Stage 1 – All referrals	986	940
Stage 2 – Considered by Consumer Regulation Panel	482	438
Stage 3 – Investigation undertaken	217	195
Published standards not being met and serious detriment	9	13

In 2023-24 we received 986 referrals which was an increase of 5% on the previous year. The proportion of referrals moved to Stage 2 was consistent with last year (49% in 2023-24, compared with 47% in 2022-23). Similarly, the proportion of cases that required further investigation remained consistent (22% in 2023-24 compared with 21% in 2022-23). In 2023-24 we found the requirements of the standards not being met and serious detriment in 9 cases, 4 less than in the previous year.

Sources of referrals

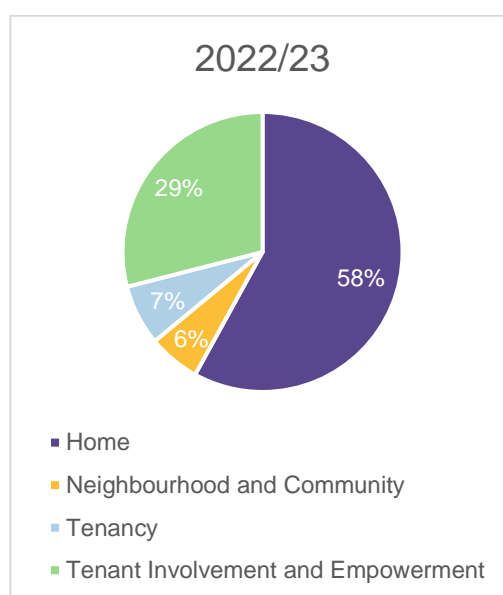
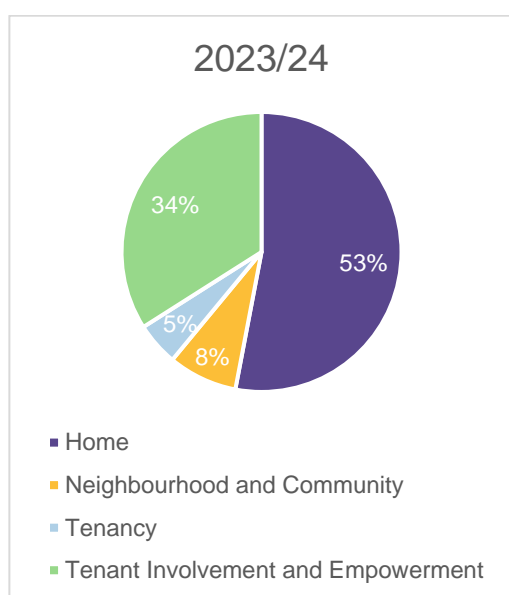
We receive referrals from a range of sources, most often from tenants and directly from landlords. We also receive information from employees or contractors, and we identify referrals in the course of our planned regulatory engagement with landlords. We also consider cases arising from referrals following media reporting.

The table below shows that for all referrals received, the source of these referrals was broadly consistent with the previous year. There was a small decrease in referrals from individual tenants, and an increase in referrals from 'other' sources, which primarily reflects an increase in referrals from the Housing Ombudsman.

	2023-24	2022-23
Referrals from individuals	58%	61%
Referrals from elected representatives	1%	2%
Referrals from contractors/employees	2%	2%
Self-referrals from registered providers	16%	18%
Self-referrals from local authorities	3%	4%
Referrals identified through regulatory engagement	4%	3%
Referrals following issues reported in the media	3%	3%
Other reports	13%	7%

Referrals by standards

The proportion of referrals relating to each of the consumer standards has also remained relatively consistent each year. As in previous years, the Home Standard was the consumer standard that was most often cited in referrals, representing 53% of all referrals considered at Stages 2 and 3. The Tenant Involvement and Empowerment Standard was the next most frequently cited standard, accounting for 34% of cases in the year. Referrals which related to the Neighbourhood and Community Standard and the Tenancy Standard represented a smaller proportion of our work.





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