



PUBLIC MINUTES
of the Board meeting
on Tuesday 16 September 2025
2 Marsham Street, London and MS Teams

Present

Bernadette Conroy (BC)	Chair
Fiona MacGregor (FM)	Chief Executive (via MS Teams)
Kalpesh Brahmhatt (KB)	
Dave Cassidy (DC)	
Deborah Gregory (DG)	
Sukhvinder Kaur-Stubbs (SK-S)	
Robert Light (RL)	
Geoff Smyth (GS)	

In attendance

Jonathan Walters (JW)	Deputy Chief Executive
Kate Dodsworth (KD)	Chief of Regulatory Engagement
Will Perry (WP)	Director, Strategy
Emma Tarran (ERT)	Senior Assistant Director, Head of Legal & Company Secretary
Karen Doran (KED)	Director of Regulatory Engagement (PRPs)
Angela Holden (AH)	Director of Regulatory Engagement (LARPs)
Robert Holroyd (RH)	Interim Senior Assistant Director of Investigation & Enforcement
Jim Bennett (JB)	Assistant Director, Policy, Strategy, and Impact (Item 9)
Anna Furlong (AF)	Assistant Director, Policy, Strategy, and Impact (Item 9)

Minutes

Anna Moore	Senior Solicitor
------------	------------------

1 Welcome and apologies

01/09/25 BC welcomed everyone back from the Summer. There were apologies from John Liver (JL) and from officers Harold Brown (HB) and Richard Peden (RP).

2 Declarations of Interest

02/09/25 DG declared new interests arising from her work with Citizen Advice and appointment as a Justice of the Peace. BC noted that arrangements have been put in place to manage potential conflicts of interest that may arise for DG in these roles. No other new declarations of interest were made.

3 Minutes of meeting 15 July 2025

03/09/25 The confidential and public minutes from 15 July 2025 were agreed, subject to a few minor amendments.

04/09/25 BC suggested that the regulator's approach to redacting public minutes should be revisited in due course, to remind board members of the principles applied.

4 Matters arising

- 05/09/25 The updates against actions were noted:
- 28/07/25 and 05/05/25 to be deferred to a later date.
 - 29/07/25 scheduled for November board.
 - 10/06/25 has been completed and matter to be removed from matters arising list.
 - 18/06/25 on the agenda for today and can be removed from matters arising list.

5 Forward planner

- 06/09/25 Members considered and noted the forward planner. BC requested that the forward planner be extended to 2026 and populated for at least first quarter of 2026.

6 Chair's update

- 07/09/25 BC noted the new ministerial appointments in MHCLG following the resignation of Secretary of State. BC noted Emma Payne and Olivia Shillabeer from MHCLG would be joining the members for a workshop session after the board meeting. BC noted that the members had a discussion on the IT systems transition.

7 ARAC Chair report of July meeting (Information)

- 08/09/25 As the chair of ARAC (JL) had given apologies for the Board meeting, JW gave members an overview of key matters arising from ARAC held on 23 July.

- 09/09/25 The committee reviewed the GIAA progress report, and it was confirmed that all audits in the 2024/2025 plan had been delivered. The scoping work for the Q1 review of safe harbours is complete. The planned Q2 audit is no longer required, and it has been agreed that it be replaced by an expanded HR Capacity and Workforce Planning audit, which will be moved to Q2, and by a review of the IT Transition programme in Q2.

- 10/09/25 FM added that it may be more useful to ask internal audit to review the strategic outlook across the wider corporate function once the executive team have completed its own considerations and implementation is underway.

- 11/09/25 The NAO has received the first draft of the regulator's accounts. The accounts will not be approved for the end of September deadline, mainly due to the time it will take to finalise the pension valuation, but it is hoped the accounts will be signed off by the end of November.

- 12/09/25 The committee considered future risk reporting requirements to ensure ARAC remained focused on the regulator's strategic risks, and the committee's continued use of "deep dives" into agreed areas.

8 N&RC Chair report

- 13/09/25 DG provided members with an overview of key matters arising from N&RC meeting held on 15 September 2025.
- 14/09/25 DG reminded members that the Cabinet Office has set a pay remit of a 3.25% increase with a possible further 0.5% uplift to address specific issues. Negotiations with the TU are ongoing and remain constructive.
- 15/09/25 Feedback on staff survey will be provided to members at the October board meeting. N&RC will subsequently complete a detailed review of the survey findings before the Organisational People Plan is updated.
- 16/09/25 The EDI strategy remains amber on the risk register. N&RC was assured that the previous resource issue has now been resolved but the matter will remain amber until the EDI strategy is finalised. Completion is delayed to allow the staff survey findings to be reflected.
- 17/09/25 It is hoped (but not yet confirmed that) the final new board member will be joining the regulator in time for him to attend the November board meeting.

JB and AF joined the meeting via MS Teams

9 Chief Executive update

- 18/09/25 FM provided an overview of the key issues set out in CEO update slides circulated to members.
- 19/09/25 FM reflected on the recent government re-shuffle arising from the Secretary of State's recent resignation. There has been no indication that there will be a change to the government's target of delivering 1.5m new homes this parliament. FM also noted the appointment of a new shadow Secretary of State for MHCLG.
- 20/09/25 AF updated members on the government's consultations set out in the CEO update slides.
- The impact of the C&C Standard on providers and the regulator's approach to regulating it was discussed. KD advised that the regulator will need to reinforce its message about being an outcomes-based regulator.
 - The TSM consultation relates to a technical change on the way TSMs are delivered by providers and to include TSMs on electrical safety requirements.
 - We plan to share a draft Rent Standard with the board in January 2026, but this could be impacted by any relevant announcement in the Autumn budget and discussions on rent convergence
 - The regulator is continuing to work with MHCLG on changes to the Tenure Standard that will be required by the Renters Rights Bill, once enacted.
 - Work on reforming the Decent Home Standard and minimum energy efficiency standard continues.
- 22/09/25 FM confirmed the date of the autumn budget has been set for 26 November 2025.
- 22/09/25 FM provided an overview from the NHF/CIH Housing Community Summit at which FM, JW and AH all spoke.

- 23/09/25 FM noted that the Regulatory Case Review 2025 was intentionally published in early September, during the NHF/CIH conference, and had been well received by the sector. FM confirmed the Regulatory Case Review will become an annual publication.
- 24/09/25 FM noted the focus report on the importance of understanding the conditions of tenants' homes was published by the regulator in July 2025. It received good coverage and was well received by the sector.
- 25/09/25 BC queried how well local authorities understand the link between their governance arrangements and achieving the required outcomes of the consumer standards. KD advised that local authorities' governance remains patchy; she explained that where local authorities have good governance arrangements it is easier for them to evidence the required outcomes, for example because record keeping and reporting is better.
- 26/09/25 BC raised the possible impact on providers of the anti-migration protests arising from the proposal to house migrants in social housing. JW also noted the impact of changing political views on some local councils.
- 27/09/25 FM confirmed the MOU with the Building Safety Regulator (BSR) had now been finalised and signed. DC requested, and BC agreed, that it would be helpful to have a board session to examine on a more granular level how the MOU will work. BC suggested a session with the BSR be scheduled for the end of 2026 Q1.
- 28/09/25 FM noted the appointment of Homes England's new chief executive.
- 29/09/25 FM noted that the HCLG Select Committee's inquiry into housing conditions in England had commenced and the regulator had provided written evidence in mid-August. The regulator has been notified that it will be called to give verbal evidence on 25th November 2025. BC thanked JB, AF and their team for their hard work in preparing the written submission for the inquiry.
- 30/09/25 SK-S queried if we had an agreed "line" on the impact of the government's policies on the sector's financial headroom. WP advised that the current FFRs were prepared before the measures set out in the spending review were announced, and the impact of these measures would not be felt in the sector for another year, so we do not have data yet to demonstrate the impact.

JB and AF left the meeting.

10 Q1 Performance and Risk report

JOM joined the meeting

31/09/25 The members noted the Performance and Risk Report Q1.

32/09/25 JOM explained that in preparing for the Annual Report in Q1, it had been identified that there were inconsistencies in how sickness data had been calculated. Checks have been carried out and JOM is confident that the issues do not impact other data however, to provide further assurance, Internal Audit has been asked to review this as part of their planned audit of HR this year. In addition, when procuring the new HR system, we will seek to build in protections to avoid future inconsistencies.

- 33/09/25 RL queried if this indicated a trend of increasing sickness across the organisation. RL suggested it would be beneficial to receive analysis on what lies behind this trend. SK-S queried how the sickness data was distributed across the organisation. DC stated the importance of understanding the impact of the location of staff and their working patterns when analysing sickness data. BC agreed this was an area of interest for the members and requested that a more detailed analysis of sickness data be provided to the board to allow for a more in-depth discussion at a future meeting.
- 34/09/25 JOM confirmed that both the payroll and HR system procurements had reached the stage of selecting a new provider.
- 35/09/25 JOM noted the EDI work is still classified as amber on the Risk Report. JOM confirmed that work has been completed on information reporting and recruitment but we were waiting for the staff survey results so these can be fed into the EDI strategy before it is finalised. BC asked that sufficient time be allocated on the agenda next month to allow for a detailed discussion and analysis of the staff survey results.
- 36/09/25 KB noted that the legal team capacity is categorised as critical and queried how this was being addressed. ERT confirmed that the team is continuing to develop systems to manage increased caseload and work is ongoing to address capacity.

JOM left the meeting

11 Q1 F&CS Update

- 37/09/25 The members noted the F&CS update paper. JW confirmed he had nothing to add to the contents of the paper and welcomed questions from members.
- 38/09/25 RL requested clarification on para 9 of Annex 1 of the finance update related to the implications of budget underspends. WP explained that there is mismatch of cashflows arising from budget underspends because the fees rebates generated by budget underspends are not reflected until the end of the following financial year.

12 Q1 Regulatory Engagement update

- 39/09/25 The members noted the Q1 Regulatory Engagement Update paper.
- 40/09/25 AH provided an update on engagement with local authorities. AH noted that there continues to be substantial variation in the quality of service provision to tenants across different local authorities, with the biggest issue remaining health and safety compliance. AH advised that while local authorities' engagement with tenants is improving, in many cases it remains a work in progress. Referrals overall (across LARPs and PRPs) continue to rise and are being kept under close review and our responsive casework has also risen in recent weeks, though this increase is linked to the identification of TSM outliers. We saw a similar increase in cases at the same time last year.
- 41/09/25 We published a C4 grading for Arun DC as part of the August batch of judgements. AH confirmed that the inspection programme remains on track.
- 42/09/25 SK-S referred to paragraph 7 of the paper, which states that we are seeing a growing number of tenant committees in providers' governance structures, and queried whether we have provided guidance to ensure these new structures are

effective and not overly burdensome. AH confirmed that our published Code of Practice includes guidance on governance structures and tenant engagement. AH also noted that although the observation in paragraph 7 relates to private registered providers rather than local authorities, we are also engaging with local authorities on more meaningful tenant engagement and governance structures that support this.

43/09/25 RL noted that paragraph 8 refers to an “uneven” delivery of outcomes to tenants and questioned how these discrepancies can be reduced. AH advised that teams are examining outcomes both across and within landlords to identify inconsistencies and patterns. Some variation within landlords is not unexpected, and regulating at the landlord level means we cannot always identify this, but we are working with landlords to ensure they can identify such variation in their services.

44/09/25 DC queried whether there is scope to publish case studies on our first C1 gradings for local authorities to help share positive lessons learned across the sector. AH responded that the sector is already doing this, noting that local authorities with C1 grades are frequently seen at public events sharing their experiences and advice. AH agreed with BC that the annual case review has focused more on non-compliant cases this year as we are so early in our programme, but we will look to provide increased balance with more examples of providers taking action to regain C1/C2 grades in future publications.

45/09/25 DG queried whether we obtain providers’ prior agreement before including them in the annual case review. AH confirmed that relevant providers were given sight of their case studies prior to publication and are allowed to comment, but their approval is not required as the information included reflects that in the public domain via the published regulatory judgement.

46/09/25 GS queried whether the regulator is being drawn into opining on local authorities’ governance arrangements, given that governance is a critical factor in delivering the required outcomes of the consumer standards. AH confirmed that this must be carefully navigated but noted that we have had conversations with the LGA regarding how the regulator can support local authorities with governance around tenant services.

47/09/25 KED provided an update on engagement with private registered providers. KED noted that in the recent batch of published judgements, there had been six governance downgrades, which is not insignificant. This reinforces messaging around the importance of good risk management and controls if landlords are to deliver better outcomes for tenants and improve financial capacity to support new supply. On the consumer side, there have not been any cases of serious concern, although some providers still face challenges in driving consistent improvements, particularly in the repairs service, across their entire stock portfolio.

48/09/25 KED stated that the team had been busy completing the financial forecast return (FFR) cleaning reviews to meet the end-of-August deadline. Work on the Q4 quarterly survey return had also been completed since the last report to board and it had been noted that there has been an acceleration in stock disposals during this last quarter of the year. The Q4 QS involves considerably more work due to the additional year end questions including around the level of investment in non-registered entities and any impairment. KED confirmed that the team is now working on stability checks.

49/09/25 KB queried whether KED was concerned about the outliers raised through the Q4 QS. KD explained that ongoing engagement was needed in only a limited number and none caused serious concerns around governance or viability. KED agreed that more detail in the paper on the context to outliers would be useful in future reporting.

13 Q1 Registrations update

50/09/25 The members noted the Registrations update paper. AH confirmed in Q1 there had been five registrations approved, four non-profit providers and one for-profit provider.

51/09/25 BC queried what protections there were for tenants following deregistration. AH confirmed that as part of the voluntary deregistration process, the regulator obtained assurances that tenants would continue to be protected.

14 Q1 Investigations and Enforcement (I&E)

52/09/25 The members noted the Q1 I&E paper. RH confirmed there had been no new cases or enforcement action since the paper was drafted.

53/09/25 BC raised that the team's capacity is highlighted in the risk management section of the paper. RH confirmed that there is one vacancy in the team. RH confirmed the team were continuing to upskill new staff and the team was currently in a reasonable position, however future capacity will be dependent on the number and nature of new cases. BC queried whether the team had the correct mix of skills and capability and is structured appropriately to deal with, for example, the new local authority work and complex financial cases. RH confirmed that recent recruitment had increased the financial capability into the team, and for C4 Local Authority cases the team work alongside a dedicated member from Regulatory Engagement to ensure the case management team had the correct skills and knowledge.

54/09/25 JW noted that when you look at cases managed by I&E, many of the providers have chronic or entrenched issues that can take a significant amount of time to resolve, sometimes multiple years. It is therefore important that the regulator clearly communicates this to providers to manage expectations.

55/09/25 KB queried if the I&E team are intervening on the right cases at the right time. JW advised that our regulatory approach will be considered as part of the Regulatory Construct Project and review of the Governance and Financial Viability Standard.

57/09/25 DG noted that in the case summaries there had been no progress made against credible action plans during Q1 on number of cases. RH agreed to consider the inclusion of some additional information in the report to explain reasons for the lack of progress.

15 Papers review

58/09/25 Members agreed they were content with the quality of the papers and that they were received on time.

16 Any Other Business (Decision)

59/09/25 There were no other matters of business for discussion.

Date of next meeting: 21 October 2025

Workshop Financial Forecast Returns (FFR)
Workshop MHCLG