



Regulator of Social Housing

Annex 4: Regulatory and equality impact considerations

Consultation on changes to our consumer standards and
requirements

9 July 2026



Introduction

1. This document summarises our considerations of the regulatory and equality impacts of all the proposed changes to the consumer standards and requirements. These are changes to the Transparency, Influence and Accountability (TI&A) Standard and Consumer Standards Code of Practice (Code) and creation of a new Competence and Conduct Standard in response to the Social Tenant Access to Information Requirements (STAIRs), competency and conduct, and the reissuing of Tenant Satisfaction Measures (TSM) requirements under our new powers.
2. For changes which relate to the STAIRs Direction or the Competence and Conduct Direction we have limited our consideration of the impacts to how we are proposing to apply our discretion to reflect those Directions, and how we are proposing to use the Code to amplify the standards those Directions require us to set. The regulator is required by legislation to comply with the Directions, and the government has undertaken its own impact assessments relating to the policy content for STAIRs and the competence and conduct requirements.
3. This document has been updated following the close of the consultation on the proposed changes to the TI&A Standard and Code of Practice. It no longer considers the proposed introduction of the electrical safety checks TSM¹.
4. When revising our proposals in response to consultation responses, we have considered the regulatory and equality impacts of these changes. We have also considered feedback we received about whether there might be any regulatory impacts or impacts on people who share protected characteristics which were not adequately reflected in the original document.

Proposed revisions to the consumer standards and related code

5. In relation to the proposed changes to the consumer standards and related code of practice that are related to the STAIRs Direction or the Competence and Conduct Direction, we have concluded that how we are proposing to word and arrange the standards we are required to introduce,

¹ Further details on decisions relating to the Electrical safety checks TSM, including regulatory and equality impact considerations, can be found at [Consultation on changes to the TI&A Standard - GOV.UK](#)

and how we are proposing to amplify those standards in the Code, is likely to have a minimal impact on the costs and benefits to the sector. This is based on the limited scope of our consideration, as described earlier, which we have judged to be proportionate. The nature of the Directions means we have limited discretion in this regard, and we have no discretion to change the related policy statements. Separately, the government conducted its own impact assessment of the competence and conduct requirements and STAIRs.

6. There is also likely to be a minimal regulatory impact resulting from the proposed changes to the TI&A Standard and Code relating to the TSM requirements. This is because these changes would not alter the TSMs themselves or the technical or tenant survey requirements, and so what landlords are required to do to meet them would be unaffected. Also, the new proposed specific expectation that would become 2.4.1 of the revised TI&A Standard is broadly the same as the existing specific expectation at 2.4.3 (which the new 2.4.1 would be replacing). While we are proposing to further clarify this requirement in the Code, in essence this would be only further amplifying a requirement that already exists currently.

Equality impact

7. Section 149 of the Equality Act 2010 sets out the general public sector equality duty (PSED). It places a duty on public bodies to have due regard to the following three aims in exercising their functions:
 - a) eliminate unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under that Act,
 - b) advance equality of opportunity between people who share a relevant protected characteristic and those who don't, and
 - c) foster good relations between people who share a relevant protected characteristic and those who don't.
8. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership.⁴
9. In developing our proposals, we gave due consideration to the above aims, and we continued to do so in finalising our proposals following the outcome of the consultation.
10. We recognise that the PSED is a continuing duty and have reviewed the evidence and our assessment following the consultation process in accordance with this.
11. We have summarised key points from our considerations below.

Groups likely to be impacted by proposals affecting social housing tenants

12. Government analysis has reported that the implications of available demographic data on social renters are that any policy affecting the social rented sector is likely to have a greater than average impact (whether positive or negative) on women, people with disabilities and people from Black Asian and Minority Ethnic (BAME) backgrounds, because these groups are all more likely to live in the social rented sector. Also, any policy affecting the social rented sector is likely to have a greater than average impact on older people compared to the private rented sector, where they are less likely to live (however, the disproportionate impact on older people is not applicable in comparison to the owner-occupied sector,

as there are greater numbers of people aged over 65 living there compared to the social rented sector).

Proposed STAIRs revisions to the TI&A Standard and Code

13. We have reflected on potential risks of exclusion and discrimination in connection with STAIRs that might arise from language barriers, literacy challenges, or digital exclusion. These could have a negative impact, particularly on equality of opportunity, for groups who share protected characteristics such as age, disability, race and sexuality. We have also considered whether any risks of exclusion arise in relation to fear or experience of discrimination based on gender identity and socioeconomic group. We believe that we have mitigated these risks by making it explicitly clear in the Code that the specific expectation at 2.1.2 of the existing TI&A Standard also applies when delivering the STAIRs requirements. This requires landlords to ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.
14. We have considered that, beyond this, our proposed revisions to the TI&A Standard and the Code in relation to STAIRs would be likely to have a neutral impact on the PSED aims. This is because they are predominately limited to reflecting the requirements of the STAIRs Direction, in line our statutory duty to comply with that Direction.

Proposed creation of a Competence and Conduct Standard and revisions to the Code

15. We have reflected on potential risks of exclusion and discrimination in relation to how we have incorporated the Government's direction on competence and conduct. This includes consideration of impacts on those with protected characteristics and people who may be at risk of discrimination based on gender identity or socioeconomic group.
16. Similarly to our proposed revisions in relation to STAIRs, our proposed standard in relation to the competence and conduct requirements is largely limited to reflecting the Competence and Conduct Direction. In view of this we have considered that, in the main, our proposal relating to that Direction are similarly likely to have a neutral impact on the PSED aims. However, we have considered that using our Code as follows should support improved outcomes for tenants, and thereby support equality of

opportunity and protection for groups which share protected characteristics and/or are vulnerable:

- We have amended the Code of Practice to make explicit that providers should consider how their approach to managing and developing staff supports the delivery of fair and equitable outcomes for tenants.
- Reflecting the government's Direction, the proposed new Competence and Conduct Standard requires landlords to develop or adopt an appropriate code of conduct for their relevant staff and to have a written policy which includes (among other things) their approach to managing and developing the skills, knowledge, experience and behaviours of their relevant staff. Our proposed changes to the Code would make it clear that landlords could choose to apply the code of conduct and written policy to a wider range of matters and staff than the standard requires. This could support improved outcomes for tenants by embedding positive cultural change across the organisation.
- The proposed wording of our Code makes it explicitly clear that landlords should consider how they meet the requirements of other regulatory standards when they develop their approach to managing and developing the skills, knowledge, experience and behaviours of their relevant staff. This clarification also aims to support improved outcomes for tenants.

Proposed TSM revisions to the TI&A Standard and Code

17. We have assessed that the proposed changes to the TI&A Standard would have a neutral equality impact on the PSED aims. These changes would not alter the TSMs themselves or the official technical or tenant survey requirements and so would not change what landlords are required to do to meet them. Also, the new proposed specific expectation that would become 2.4.1 of the revised TI&A Standard is broadly the same as the existing specific expectation at 2.4.3 (which the new 2.4.1 would be replacing). For ease of reference, this is the specific expectation that relates to landlords ensuring that their reported TSM information is an accurate, reliable, valid, and transparent reflection of their performance.
18. However, we have considered that our proposal to further clarify this specific expectation in the Code should further strengthen its role in supporting the TSMs as a means of providing tenants with greater transparency about their landlord's performance, and as a source of

intelligence for the regulator. It would also specifically emphasise the need for landlords to have a robust approach to collecting and processing management information. With this mind, we have considered that by supporting the delivery of improved outcomes for tenants, this change to the Code should support equality of opportunity and protection for relevant groups which are disproportionately represented in social housing. It could also have a positive impact on the need to foster good relations through further promoting an improved understanding of how landlords of social housing tenants are performing (including by reference to tenants' perceptions through the tenant perception measures).

19. Following the consultation, we have added further text to the Code to make it clear that the TSM Direction requires registered providers to annually publish their performance against the TSMs. This is to ensure that requirements on landlords are clear to tenants. We have also added text into the final TSM Direction to clearly reflect that information must be published in a manner which is timely, clear and easily accessed by tenants.