



A new deal for social housing

(Ministry of Housing, Communities and Local Government)

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(Final version)

ABOUT AGE UK

Age UK is a national charity that works with a network of partners, including Age Scotland, Age Cymru, Age NI and local Age UKs across England, to help everyone make the most of later life, whatever their circumstances.

In the UK, the Charity helps more than seven million older people each year by providing advice and support. It also researches and campaigns on the issues that matter most to older people. Its work focuses on ensuring that older people: have enough money; enjoy life and feel well; receive high quality health and care; are comfortable, safe and secure at home; and feel valued and able to participate

ABOUT THIS CONSULTATION

The consultation from the Ministry of Housing, Communities and Local Government (MHCLG) covers a number of themes, many linked to problems revealed by the Grenfell Tower tragedy. These include:

- improving fire safety and a review of the decent homes standard
- encouraging tenant participation
- promoting community-led housing
- making improvements to complaints procedures
- strengthening the regulatory framework to raise standards
- performance indicators linked to grant funding
- tackling negative images associated with social housing
- measures to increase the overall supply of social rented housing

The consultation also represents a welcome reversal of Government proposals on social housing in a number of areas including:

- the proposal to force local authorities to sell high value homes (which may have disproportionately affected bungalows)
- phasing out lifetime tenancies for social housing
- capping housing benefit (LHA) payments for supported housing (which would have impacted on sheltered housing)

SUMMARY RESPONSE

- **Housing supply**
 - Age UK welcomes the recently announced removal of the Housing Revenue Account (HRA) borrowing cap on local authorities and would like to see further measures to help increase the availability of genuinely affordable housing, including specialist options for older people in the social rented sector.
 - The Government should make a stronger commitment to providing affordable housing options to older people in the social rented sector, to offer an alternative to those forced into unsuitable private rented accommodation.

- **Supported housing**

- The Government should introduce regulatory measures to achieve higher and consistent standards for all sheltered and extra care housing in the social rented sector. This would address variations in quality and the levels of care and support offered for tenants with similar needs.
- All sheltered housing should have a scheme manager or an appointed support officer with specific responsibility for the welfare of older tenants. Also, floating support should be available for older tenants living in mainstream housing to improve the quality of housing provision overall. Any final settlement on funding for supported housing, being negotiated at the moment, should include these provisions.
- Local authorities should look at how more sheltered and extra care schemes could act as a resource hub for older people living in ordinary non-specialist housing across all tenures. We would like to see Government investment in this approach to encourage more widespread take up.

- **Older homelessness**

While we welcome recent changes to homelessness legislation, local authorities' reliance on the private rented sector in meeting their homelessness duties does not work for many older homeless people and risks creating or exacerbating cycles of homelessness. We need a significant increase in the supply of genuinely affordable social housing, so that older people can avoid becoming homeless in the first place and get their lives back on track if and when this occurs. Under existing rules, older homeless people should have 'priority' for social housing, but this does not amount to much in high-demand areas.

- **Tackling disrepair**

- All social landlords need to improve standards in the delivery of repairs and adaptations, in order to protect the health, wellbeing and independence of vulnerable older tenants. All local authorities should have a clear strategy to improve collaboration between health, housing and adult social care through Health and Wellbeing Boards.

- **Anti-social behaviour**

- Anti-social behaviour represents a range of complex problems but is a major cause of distress for many older tenants. We would like to see further measures to help enforce existing legal remedies as well as resources for mediation services to resolve disputes.

- **Complaints**

- Age UK supports reforms to complaints procedures and backs the suggested measures to speed up the process. We would like to see the removal of the 'designated person' as a filter for complaints and believe that housing support officers should play a central role in resolving problems quickly. They should have the ability to take interim steps to protect the welfare and safety of older residents until the problem is resolved.

- **Decent homes and accessibility**

- The Government should develop a new initiative designed to address the failure of social housing to meet the MHCLG four main indicators of visitabilityⁱ (i.e. level access; a flush threshold; door width and circulation space and a toilet on the entrance level floor). This should be part of a programme to increase the accessibility of existing homes towards reaching the lifetime homes standard.
- All new social housing needs to be built to the lifetime homes standard. It is particularly important for older tenants that new developments are located in age-friendly environments that ensure easy access to essential services and transport links.

- **Tenants' rights**

- Given the Law Commission review of the rights of leaseholders, the Government should also consider giving housing association tenants the collective right to manage, including sheltered tenants who are dissatisfied with the service provided by their landlord.

BACKGROUND

Over many years the traditional role of social housing has changed due to a decline in the supply of new homes, the extension of the Right to Buy (without replacing lost stock), and a shift in subsidies towards homeownership and the private rented sector. Rather than remaining a mainstream tenure it has become the tenure of last resort.

The consultation comes in the context of the treatment of tenants affected by the Grenfell Tower fire tragedy. As well as a revised approach to fire safety the Government says it wants to see a change in attitudes towards tenants and the status of the social rented sector, while also seeking an increase in the supply of social housing. At the same time it says that homeownership, for those who can afford it, should be the preferred tenure of choice.

The Government has lifted the cap on the ability of local authorities to borrow money against their Housing Revenue Account (HRA). The recent Budget announced some further funding and measures aimed at increasing supply. This is welcome but still raises questions about the actual number of social homes likely to be built as a result

of the removal of the borrowing cap, estimated by the OBR to be 9,000 homes by 2023/24ⁱⁱ. We are concerned that these modest increases will have little impact on the social housing waiting list, which currently numbers one million households, mostly families. The Government needs to clarify what proportion of new homes in the social sector will be available at a lower 'social' rent rather than at a higher 'affordable' rent (i.e. 80 per cent of local market rents).

- Around 25 per cent of social tenants are aged 65+, which makes the treatment of older tenants, as well as age-specific issues like adaptations an important issue to be addressed by the Government.
- The highest proportion of supported retirement housing is in the social rented sector. We have seen a continued decline in housing support services offered by many schemes, especially the withdrawal of scheme managers (wardens). Many older tenants still regard this additional support as one of the defining features of sheltered housing.
- The management, support and quality offered by sheltered housing was examined in the recent CLG select committee inquiry on the future funding of supported housing. The Government had planned to cap funding, but subsequently reversed its position to continue the existing funding arrangements under Housing Benefit. While this is very welcome, any settlement seems unlikely to reverse the decline in support services.

OUR RESPONSE

1. How can residents best be supported in this important role of working with landlords to ensure homes are safe?

- **Key role of housing support and scheme managers**

- Age UK believes housing support workers and scheme managers play a vital role in responding to the needs of older tenants. They help with a wide range of issues.
- They tackle safety issues, help resolve neighbourhood disputes and ensure older tenants are linked into essential services and welfare benefits. They facilitate repairs, adaptations, home safety and security measures. They also help tenants address problems related to loneliness and ensure vulnerable older tenants have a say in the management of their housing and related services.
- For all these reasons we would like to see the re-instatement of scheme managers, where they have been lost, as an essential component of a sheltered scheme. We also believe that floating housing support should benefit older tenants living in general needs housing – this was one of the important

principles of the 'Supporting People' programme, which has been eroded over the years. However, we were pleased to see the MHCLG has acknowledged the importance of delivering and funding support services to those who benefit from themⁱⁱⁱ.

- **Fast and efficient repairs and adaptation services**

- Well-managed repairs and maintenance are important to protecting the health and safety of older people. Slow and unresponsive services can be seriously detrimental to health and can make the difference between an older tenant living independently or ending up in residential or nursing care. Support officers should ensure that routine maintenance and repairs are carried out to protect tenants' safety and wellbeing.

- **High rise living and older tenants**

- We would like to see a review of the suitability of high rise flats for older and disabled people who have difficulties leaving their home in an emergency. This should include a review of how far local authority allocation policies ensure lower floor flats are allocated to older and disabled people - with robust procedures for escape and rescue in an emergency. The Grenfell Tower disaster has raised serious questions over the policy of 'stay put' and we believe all social landlords need to consider emergency evacuation procedures that take into account the needs of older and disabled people.
- All tenants should have access to information on fire safety audits carried out on their flats and have a regular forum to discuss their concerns. We support measures to improve fire safety in flats, including the removal of flammable cladding and the introduction of sprinkler systems. We believe these measures also need to be considered in relation to both sheltered and extra care schemes, which are an integral part of the social housing offer for older people.

- **Sheltered housing – consistent standards**

- We need to ensure consistency in the application of safety and quality standards across all forms of sheltered and extra care housing. The Government should take this opportunity to look at how far home safety measures are being successfully implemented in sheltered schemes. We support performance indicators, as we believe they will help to deliver this objective and ensure remedies are implemented.

2. Should new safety measures in the private rented sector also apply to social housing?

- Yes, there should be a consistent approach to all safety measures regardless of tenure. We would like to see a broader review of home safety measures,

including the cause of trips and falls in social housing – which can be particularly devastating for older tenants. Social landlords need to take action to reduce the number of falls, for example through appropriate adaptations and the refurbishment of existing stock.

- We would also like to see the private rented sector complying with higher standards on adaptations. This includes having better access to the Disabled Facilities Grant, which under current arrangements is very difficult for landlords to utilise – we believe the minimum period of residence should be reduced down from 5 years. A better solution would be to reform security of tenure and eliminate no-fault evictions.

3. Are there any changes to what constitutes a Decent Home that we should consider

4. Do we need additional measures to make sure social homes are safe and decent?

- We would like the definition of ‘Decent Homes’ strengthened in relation to accessibility, climate change and age friendly environments, given the implications for older people.
- The most significant problem is not with the definition of Decent Homes but with local authorities’ capacity to consistently enforce regulatory standards and carry out timely maintenance and repairs to the existing stock. In the context of cuts to local authority budgets it is not surprising that attaining the Decent Homes Standard is problematic (i.e. proactively identifying problems and taking remedial action). Both local authorities and Central Government have shared responsibility for making improvements to the stock of social housing, and we would like to see the latter do more to support local authorities.

• Phased programme of improvement

- Older and vulnerable people previously benefited from the ‘Decent Homes Programme’ which made significant improvements to the social housing stock. We would like to see the Government undertake a similar initiative going beyond these core standards to ensure the majority of the stock is accessible and as age-friendly as possible.
- One practical suggestion to raise standards is for a phased approach to address basic ‘visitability standards’ in the current stock of social housing and where possible seek to attain the lifetime homes standard. The Government should carry out a national programme to ensure the installation of basic and affordable accessibility features. For example, a national programme to facilitate the installation of showers (as a choice) could make a significant

difference to older people while reducing the demands on social care for older tenants who might otherwise need assistance with bathing. Economies of scale for initiatives like this could dramatically reduce the cost per unit.

- **Linking decent homes to age friendly communities**

- Social housing needs to be flexible to the needs of an ageing population. The design, layout and environment for social housing is likely to have an impact on the health and wellbeing of older tenants and should be a component of what makes a decent home. Inaccessible or isolated homes and communities can be a barrier to the delivery of health, care and support services which in turn increases pressure on the NHS and social care system.

- **Impact of climate change**

- As well as raising the energy performance certification to band C by 2030, a revised definition of a decent home needs to place greater emphasis on the impact of climate change and extreme weather conditions which can have a particularly detrimental impact on older and vulnerable people. Improvements to energy efficiency must also include measures that ensure social housing can be kept cool in the summer. We welcome the new energy efficiency requirements placed on the private rented sector.

- **Safety standards for sheltered schemes**

- There is significant variation in the quality and standards of sheltered housing. This was noted by the recent CLG select committee inquiry looking at the funding of supported housing. The Government should take this opportunity to review safety standards in sheltered and extra care housing and ensure that social landlords are complying with existing safety requirements. All social schemes must be subject to regular inspection.
- In addition, we are worried that with the decline in support staff for schemes (including scheme managers and floating support) increases the likelihood that the safety aspects of schemes are neglected. Each scheme should have a designated member of staff with responsibility for the welfare and safety of tenants.

5. Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?

Age UK has set out its views of on dispute resolution in our response to '*Strengthening consumer redress in the housing market - A Consultation*'. In summary:

- **Information and advice**

- Housing redress systems for older people need to be linked to increased funding for independent housing information, advice and advocacy services

which would reduce pressure on the Ombudsman. In addition Ombudsman schemes should be able to link older people into local information and advice services.

- The true test of any system is how well it works for more vulnerable people, who may need some support to raise a complaint and put across their views. Knowledgeable and articulate tenants may find it easier to use, but the systems, processes and fairness that underpin it need to work for vulnerable and often excluded groups. In particular, this means having access to independent advice and advocacy for those in need of support.

- **Navigating complaints procedures**

- Whatever shape the final redress system takes, complaints should be quickly and effectively directed to the correct service or officer. This is particularly important for older and vulnerable complainants who may find it more difficult to navigate the system and suffer greater adverse effects from delays.

- **Digital exclusion**

- There should be a continued priority of making online information accessible and age friendly, as well as providing information in printed and other formats designed to make it as easy as possible for older people to pursue a complaint.

- **Removing referral by a 'designated person'**

- Internal complaints procedures should be consistent across providers, with greater protection for complainants. Older tenants currently dealt with by the Housing Ombudsman should not have to be referred by a 'designated person' and tenants should not have to wait eight weeks to self-refer (see below).

- **Identifying and publishing patterns of complaints**

- Age UK supports the principle that complaints should be used by the relevant regulatory body to identify reoccurring and common problems, to improve the delivery of housing services. There should be transparency with the publication of data showing progress on the problems raised.

- **Fast track and interim measures for vulnerable groups**

- Complaints by older and vulnerable people, where the issue is likely to have a serious impact on their health and wellbeing should be given additional priority by Ombudsman schemes. Where the health and safety of the tenant may be put at risk due to a failure to resolve a complaint, the Ombudsman should be able require interim measures that protect the welfare of the tenant.

6. Should we reduce the eight week waiting period to four weeks, or should we remove the requirement for the “democratic filter” stage altogether?

- Age UK supports a faster more straightforward procedure for resolving disputes. The current requirements are unnecessarily bureaucratic and operate as a deterrent for many older tenants to make a complaint. We believe that the “democratic filter” stage should be removed, for the reasons set out below.

7. What can we do to ensure that the “designated persons” are better able to promote local resolutions?

- A ‘designated person’ needs to have the capacity, resources and knowledge to help achieve local resolution. Without this, a ‘designated person’ simply becomes a pointless and bureaucratic obstacle towards resolving a dispute. The Government should consider further funding for the First Stop service – coordinated by the Elderly Accommodation Counsel (EAC) – to bring these local services together with an appropriate level of funding. The EAC have already demonstrated that this is a cost effective approach over the longer term and could help the Government to meet its objectives. We also believe that independent advice and advocacy services including local Age UKs, Shelter housing advice centres and Citizens Advice have a key role to play, although they must be appropriately funded to deliver this service.

8. How can we ensure that residents understand how best to escalate a complaint and seek redress?

9. How can we ensure that residents can access the right advice and support when making a complaint?

- **Engaging with the complaints process**

- Using a variety of different channels and media (e.g. print, phone, DVD or CD-ROM; face-to-face; website; and email) can help older and disabled people. However, Local authorities need to avoid over reliance on online services to which many older tenants will not have access. As well as readily available printed material there needs to be a trusted point of contact to help older tenants with complaints. The Government and professional housing bodies need to do more to develop a culture where complaints are seen as a helpful and vital way of improving housing management. We also have concerns over examples where a request or complaint, related to a home adaptation or repair, is ignored as a means of putting pressure on an older tenants to move. Although it is perfectly legitimate for landlords to discuss the practicalities of home adaptations - set against the option to move to more suitable accommodation – simply ignoring the requests of older tenants is unacceptable.

- **Funding advice and Information services**

- As previously stated, independent advice, information and advocacy services need to play a prominent role in helping to resolve disputes and help residents

to take further action if required. It was observed by the recent CLG Committee inquiry into older people's housing that housing information and advice needs to take a more prominent role. We note that the Government already provides significant funding for the leasehold advice via LEASE. We would like to see equivalent funding for the social rented sector working through agencies such as the Elderly Accommodation Counsel.

- **Housing support services**

- Previously the 'Supporting People' programme recognised that linking together and coordinating housing services needs trained support staff. Despite this, we have seen an ongoing decline in housing support for more vulnerable residents and a decline in the number of scheme managers. Housing support ensures that older tenants have access to a wide range of services that allow independence, and has wider benefits for people's health and wellbeing. This trend towards cutting these services must be reversed immediately.

10. How can we best ensure that landlords' processes for dealing with complaints are fast and effective?

There are several measures that can help, for example:

- Staff training – understanding the problems faced by older tenants
- Adherence to best practice such as following the Institute of Housing and National Housing Federation guidelines.
- Avoiding the dangers of excessively standardised approaches' such as the use of pro forma letters or overly legalist terminology that alienate and confuse tenants.
- Demonstrate listening and genuine understanding of problems as well as building up trust with older residents with strong and regular lines of communication.

11. How can we best ensure safety concerns are handled swiftly and effectively within the existing redress framework?

- There are a range of areas where the normal speed of redress will be insufficient. There should be a fast-track process for safety concerns requiring immediate investigation such as broken doors and security chains, faulty window locks, trip hazards, electrical, gas safety, and carbon monoxide alarms. Landlords need to recognise the importance of building up trust with staff visiting the tenant's homes to carrying out checks and repairs.

13. Should landlords report performance against these key performance indicators every year?

Yes

14. Should landlords report performance against these key performance indicators to the Regulator?

- Yes. All social landlords should monitor common problems for older tenants based on key performance indicators, report them to the Regulator, and demonstrate practical measures to remedy them. Although their primary aim is to increase transparency, they could also be helpful in revealing variations in the quality and safety of sheltered and supported housing schemes, and we recommend that the Regulator should undertake a review of sheltered schemes as part of a drive for more consistency across different schemes.

15. What more can be done to encourage landlords to be more transparent with their residents?

- The Government should introduce stronger regulation on the range of information that must be provided to tenants on an annual basis. This could include safety audit reports, breakdown of service costs and details of contractors carrying out work.

16. 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?

- This should include an overview of how far the complaints of older residents have been met, as well as identifying patterns in complaints that require further investigation. The report should enable the identification of systemic problems which allow the policy makers to consider further intervention.

17. Is the Regulator best placed to prepare key performance indicators in consultation with residents and landlords?

- Yes. The Government should ensure that the Regulator has suitable expertise on issues affecting older tenants.

18. What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?

- It would be useful to make a comparison of housing support services provided in sheltered schemes. As well as key areas on safety, security, maintenance and comfort it would be useful to have a better understanding of the presence and levels of housing support for older tenants living in mainstream and sheltered housing.

21. Is there a need for a stronger representation for residents at a national level? If so, how should this best be achieved?

- Yes. A national body needs to represent older tenants and build on the work done by existing organisations and local forums. A national voice for older tenants needs appropriate resources to allow participation and representation.

- We have previously expressed our concerns about the lack of a national voice for older tenants living in sheltered housing. Many tenants struggle to get their voices heard on key issues affecting them – such as the withdrawal of support services. Regardless of the position the Government or landlords may take on this issue it is unacceptable that major policy decisions, profoundly affecting older tenants, are made without any national representation equivalent to provider groups such as the NHF. We also believe that support for a national body representing older tenants in sheltered housing could make a significant difference to raising standards.
- As previously stated, the Government should consider further funding for the First Stop advice service – coordinated by the Elderly Accommodation Counsel (EAC) – to bring these local services together with an appropriate level funding.

22. Would there be interest in a programme to promote the transfer of local authority housing, particularly to community-based housing associations? What would it need to make it work?

- This would require further consultation with older residents – many of whom are likely to be interested in this approach. An Age UK inquiry into retirement housing included a cooperative community led scheme. Those taking part in the inquiry said that more older tenants would be interested in alternative housing models if they knew how to go about setting them up and were given sufficient expert support.

23. Could a programme of trailblazers help to develop and promote options for greater resident-leadership within the sector?

- Yes. There are already models of housing showing how this could be done – demonstrated by specialist housing associations such as Anchor and Hanover.

25. Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?

One example is the collaboration between a cohousing group and Hanover Housing Association. This model is interesting because it encourages mutual support while giving control over housing management. There is scope for looking at how different forms of cooperative housing with care and support could become more widely available as an option for more older people.

26. Do you think there are benefits to models that support residents to take on some of their own services? If so, what is needed to make this work?

There are good examples of older residents taking on community volunteering such as looking after gardens and communal areas as well as organising group activities, albeit with some facilitation. There is some merit in investigating where similar approaches might work for other communities and schemes. However, it should be noted at the outset that this approach should be pursued on a case-by-case basis and should not form the basis for blanket policies

27. How can landlords ensure residents have more choice over contractor services, while retaining oversight of quality and value for money?

- Landlords should allow residents a choice of contractors that meet agreed criteria. Tenants should also be able to suggest contractors that meet the criteria or challenge the inclusion of contractors who do not meet the criteria. Older residents should have an opportunity to influence the quality standards applied to contractors, who should also demonstrate sensitivity to the needs of older tenants where work is being carried out.

28. What more could we do to help leaseholders of a social housing landlord?

- Older leaseholders should be able to influence the delivery of services and have a say over contractors and tendering of work. It should be made easier for leaseholders to form a tenants association to represent their views. We would also like to see greater parity between the rights of leaseholders and tenants. For example, housing association tenants having the same 'right to manage' as council tenants and leaseholders.

29. Does the Regulator have the right objective on consumer regulation? 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, and if so how?

- Yes – consumer standards should reflect performance indicators designed to protect the safety and wellbeing of older tenants. Older people should have the opportunity to define these standards, including by providing insight on what they would mean on a practical day-to-day basis.

30. 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?

- Yes. It would be useful for the regulator to issue a code of practice that specifies consumer standards designed to protect vulnerable or isolated older people.

31. Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If not, what would be an appropriate threshold for intervention?

- Part of any threshold for intervention should be whether the actions or inactions of the landlord puts the health and wellbeing of older people at risk, both in terms of physical and mental health. For example: a failure to repair a faulty heating system in a timely manner, deliver an adaptation to prevent a trip hazard, or an older tenant trapped in their home without support because of a lift breaking down. All these practical issues are potentially of 'serious detriment' to older tenants, and could all impact negatively on health.

32. Should the Regulator adopt a more proactive approach to regulation of consumer standards? Should the Regulator use key performance indicators

and phased interventions as a means to identify and tackle poor performance against these consumer standards?

- Yes. This should include transparency of information on safety audits, contractors and sub-contractors, and service charges. We believe this depends on how far the performance indicators and consumer standards reflect the needs of older tenants, and ultimately how far they contribute to improvements in the quality of services on the ground.

33. Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords? If so, what measures would be appropriate?

- Yes. The regulator should be able to ensure that local authority landlords deliver on the proposed performance indicators. It needs the power to take strong and decisive action where the ongoing failure is putting vulnerable older tenants at risk.

35. Is the current framework for local authorities to hold management organisations such as Tenant Management Organisations and Arms Length Management Organisations to account sufficiently robust? If not, what more is needed to provide effective oversight of these organisations?

- We have not had specific feedback on these issues, although we are concerned that older people are not properly represented on these bodies.

36. What further steps, if any, should Government take to make the Regulator more accountable to Parliament?

- The Regulator should provide an annual progress report based on agreed KPIs. The KPIs need to reflect the requirements and concerns of older tenants and should reveal practical and real progress toward improving relevant housing conditions and services. There should be specific KPIs for sheltered schemes, to be devised in consultation with older tenants themselves. In addition, the report should reflect the experiences of older tenants to policy makers. Again, it is notable that older people's views on the decline of scheme managers were never highlighted or properly acted on at a national level. Age UK and residents were told that this decline as a result in changes to 'Supporting People' funding were down to the discretion of local authorities. This meant there was no proper discussion with tenants about the wider implications of wardens being lost and the impact this has had. It has been treated as a fait accompli rather than the basis for collective discussion with residents' about the core services sheltered housing should offer.

37. How could we support or deliver a best neighbourhood competition?

- We suggest that a 'best neighbourhood' competition should be geared towards highlighting how older tenants are supported in their community and in their turn providing support themselves. Many older tenants are carers and volunteers and their contribution is often key to a healthy community. We support an

approach that showcases best practice and demonstrates the importance of housing support.

- Alternatively, a competition approach could promote sheltered housing as a community resource and showcase intergenerational initiatives that bring together older and younger tenants. It could also highlight examples of where older people contribute to maintaining their schemes in a way that encourages community spirit. Age UK strongly believes we need to celebrate the benefits and mutual support provided by retirement housing in the social rented sector, and that it could be used as an example of best practice to provide guidance to the rest of the social sector. The Government should consider approaching the Elderly Accommodation Counsel to take this forward.

38. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?

- See above

39. What is needed to further encourage the professionalization of housing management to ensure all staff deliver a good quality of service?

- All housing managers should follow existing CIH training and similar course designed to help them understand and empathise with the needs of older residents.

40. What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

- A key indicator for Age UK is how far older residents have access to support services that promote health and wellbeing and social engagement. Indicators should be based on how the actions of the landlord facilitates the health, happiness, and wellbeing of their tenants. One key measure might be how often older people make contact with a support officer and for sheltered housing, and how many have regular access to a scheme manager.

41. What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities? Should landlords report on the social value they deliver?

- Sadly with cuts in funding we have seen a decline in many of the additional services that social landlords provided to local communities such as handy person schemes. Social landlords could have a stronger role in offering community services to vulnerable older people living in private sector housing. However, realistically extending the role of housing associations requires adequate funding, especially where social landlords are struggling to deliver their core services. In the longer term this approach will provide savings to the NHS and social care system.

42. How are landlords working with local partners to tackle anti-social behaviour? What key performance indicator could be used to measure this work?

- Anti-social behaviour is an issue regularly raised with Age UK. It can manifest itself in many different ways and is not open to simple solutions. In our view the problem is not necessarily with the existing legal framework but with the failure of providers to take action and insufficient mediation to resolve disputes. Many older people feel particularly vulnerable to criminal or aggressive behaviour and need to feel confident that they have the support of their local authority and police force in dealing with these matters.

43. What other ways can planning guidance support good design in the social sector?

- Age UK is currently waiting for the implementation of planning guidance on housing for older and disabled people. Our main concerns are that the scope of the guidance will be too narrow, and that it may still be ignored by local authorities. Guidance in this area needs to be accompanied by a mandatory requirement to produce a housing strategy that examines the challenges and opportunities presented by an ageing population.

44. How can we encourage social housing residents to be involved in the planning and design of new developments?

- Fundamentally we would like the National Planning Policy Framework (NPPF) to require a local authority to have a housing planning strategy for older and disabled people's housing. This must be the starting point for extending the housing options of older people – yet only around 10 per cent of local authorities have such a plan. There are already good examples of how older tenants can be involved in the planning and design of new developments, including the age friendly city group led by Manchester City Council and the Government's own healthy new towns initiative. Approaches pioneered by these initiatives must be more widely applied.

45. 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.

- Regardless of the correct balance, an important aspect for Age UK is whether this will increase the supply of truly affordable retirement housing, linked to services that will benefit older tenants on modest incomes. As well as borrowing and grant funding, planning reform targeted at land value will also play an important role in delivering affordable homes.

46. How we can boost community-led housing and overcome the barriers communities experience to developing new community owned homes?

- Many older tenants may be interested in community-led housing but need appropriate support to make this a realistic option. The support provided by Hanover Housing Association to establish a cohousing scheme for older people in Barnet is a good example of the role housing associations can play (although even with this assistance it took many years to establish). It would be good to see more places following the example of Waltherton and Elgin Community Homes to allow more older tenants to become involved in the running and management of their homes.

47. 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?

- Our main concern is to increase the proportion of social homes at a lower rent level. The Government's definition of 'affordable' is misleading and problematic, particularly in areas such as London with high market rents. The social sector should offer good retirement housing options for lower income older people at a reasonable social rent.

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ⁱ Government Response to the Report of the House of Commons Women and Equalities Committee Building for Equality: Disability and the Built Environment (MHCLG 2018).
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/702687/CM9527_web.pdf

ⁱⁱ Economic and fiscal outlook (OBR 2018).https://cdn.obr.uk/EFO_October-2018.pdf

ⁱⁱⁱ Funding Supported Housing: Policy Statement and Consultation (MHCLG and DWP 2018)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/656027/Funding_supported_housing_-_policy_statement_and_consultation.pdf