

READING BOROUGH COUNCIL

REPORT BY EXECUTIVE DIRECTOR FOR ECONOMIC GROWTH AND NEIGHBOURHOOD SERVICES

TO:	Housing Neighbourhoods and Leisure		
DATE:	10 th November 2021		
TITLE:	The Charter for Social Housing Residents - Social Housing White Paper		
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SERVICE:	Housing	WARDS:	All
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1. PURPOSE OF REPORT AND EXECUTIVE SUMMARY

- 1.1 The Charter for Social Housing Residents - Social Housing White Paper [The charter for social housing residents: social housing white paper - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/the-charter-for-social-housing-residents-social-housing-white-paper) was issued in November 2020 and aims to deliver improvements in transparency and accountability for social housing tenants from their landlord and ensure the tenants voice is heard.
- 1.2 The publication of the Charter follows widespread consultation with tenants, professional bodies and other stakeholders following the Green paper, 'A New Deal for Social Housing with Social Housing Tenants'¹. It is part of a package of reports, reforms and enquiries across the Sector that also includes an enhanced and strengthened role for both the Housing Ombudsman and the Regulator of Social Housing, and the introduction of a new Building Safety Regulator.
- 1.3 The Charter sets out seven commitments that residents should expect from their landlord and further consultation and legislation will be passed to ensure the structure is in place so that these commitments are met. The expectation is that Social Housing Landlords will not wait for the legislation and changes to be put in place but start work now to ensure they meet the requirements.
- 1.4 The Charter also sets out proposed changes to Tenant Satisfaction Measures, Complaints Handling and the Decent Homes Standard as well as expectations for all Social Landlords to report on their performance. Although the Complaints handling Code is now live, further consultation is taking place on each of the other proposed changes.
- 1.5 The Charter marks a major change for Local Authorities who retain social housing stock as it will ensure Local Authority landlords are required to meet the same requirements as other Social Housing landlords in the sector, and it will also reintroduce proactive regulation, including inspections, across the whole social housing sector.

¹ <https://www.gov.uk/government/news/social-housing-green-paper-a-new-deal-for-social-housing> -Accessed 20/9/21

2. RECOMMENDED ACTION

- 2.1 That Housing Neighbourhoods and Leisure Committee note the details of Social Housing White Paper and the current position in terms of implementation.

3. POLICY CONTEXT

- 3.1 The Regulatory Framework for Social Housing was developed and launched in 2010 by the then Tenant Services Authority (TSA). The TSA was set up to bring, for the first time, the regulation of social housing across all providers (e.g. both Local Authority stock and Private Registered Providers (Housing Associations) under one body. Two categories of standards were created:

- **The Economic Standards** which covered Governance, Finance and Value for Money
- **Consumer Standards** covered the Home, Tenant Involvement and Empowerment, Neighbourhood and Community and Tenancy standards.

However, recognising that different rules and reporting frameworks applied to Local Authorities for both finance and governance, the TSA only regulated the Consumer Standards for Local Authority Landlords.

- 3.2 The Localism Act in 2011 moved the regulatory function from the TSA, which was subsequently abolished, to the Homes and Communities Agency (HCA). The Economic Standards continued to be proactively regulated by the HCA but the Consumer Standards, under the current regulatory system of Co-regulation were only reactively regulated where a “*breach or potential breach of a consumer standard leads to risk of serious detriment the regulator may intervene*” (HCA The Regulatory Framework for Social Housing April 2012).
- 3.3 At the point that the HCA was abolished in 2018, the Regulator of Social Housing (RSH) again became a stand-alone body and is currently still regulating under the existing model of proactive regulation for the Economic standards and reactive regulation of the Consumer Standards.
- 3.4 The reports to date regarding the tragic events of the fire at Grenfell Tower indicated a range of issues across the housing sector including not only building safety, but also a lack of respect and regard for the tenants living in the building who had been reporting their concerns about the works taking. Survivors of the fire reported raising concerns about the works taking place four years prior to the tragedy with and no action being taken.
- 3.5 This event triggered a series of reviews, enquiries and research which included engagement with tenants and stakeholders across the country. Running alongside the Hackitt Review and the Grenfell Tower Enquiry, a Green paper - a New Deal for Social Housing and a Call for evidence: Review of Social Housing Regulation, was launched in 2018 and a programme of consultation and engagement followed, including roadshows, online surveys and focus groups.
- 3.6 Building on the above, the Social Housing White Paper - The Charter for Social Housing Residents was launched in November 2020 and collates a range of different initiatives and legislative changes from across the housing landscape.

4. NEXT STEPS

4.1 Social Housing White Paper

4.2 The Charter sets out 7 commitments that social housing tenants should expect from their landlords. These are:

- *To be safe in your home*
- *To know how your landlord is performing including on repairs, complaints and safety and how it spends its money so you can hold it to account*
- *To have your complaints dealt with promptly and fairly with access to a strong Ombudsman, who will give you swift and fair redress when needed*
- *To be treated with respect backed by a strong consumer regulator and improved consumer standards for tenants*
- *To have your voice heard by your landlord, for example through regular meetings, scrutiny panels or being on the Board.*
- *To have a good quality home and neighbourhood to live in with your landlord keeping your home in good repair*
- *To be supported to take your first step to ownership*

4.3 The main aims behind the White Paper are to ensure tenants are treated with respect, listened to about their concerns and a fairer and safer system for all those living in social housing is established. The Charter focuses on tenant engagement and empowerment and has a strong emphasis on culture change, which has implications not just for the Housing Service, but also corporately across all customer facing teams.

4.4 Some of White Paper proposals will require primary legislation before they can be implemented, but as the Queen's Speech 2021 did not include a Social Housing Bill there are currently no clear timelines as to when this will occur. The timetable for implementation may be further influenced by the change in housing minister in September 2021.

4.5 The White Paper sets out the intention that the Regulator will move to proactive regulation of all standards including inspections of all large landlords every 4 years, pending further legislation. Both the RSH and the Housing Ombudsman have received more resources and powers to enable them both to deliver a more robust role in overseeing the provision of Social Housing across all landlords. The expectation is that Landlords should not wait until the legislation is passed but should be preparing for the requirements of the White Paper now.

4.6 The table below sets out the expectations listed in each of the commitments in the White Paper, and the current position in terms of additional legislative requirements and any Reading Borough Council responses where possible.

4.7 There is no timetable attached to delivering the measures set out in the Social Housing White Paper. It provides a framework for reform, but the detail of many of the proposals requires further development and engagement with the sector which may take considerable time due to the requirement for further consultation and legislation.

Chapter	Key points	Current Position
<p>1 To be safe in your home - Many of the building safety issues that Grenfell exposed are already being investigated and addressed. This theme in the charter is about refocusing trust and ensuring tenants 'feel' safe as well as being safe.</p>	<ul style="list-style-type: none"> • Building safety will become part of the revised consumer regulation standards (see chapter 2) • All landlords will need a nominated publicly named 'Accountable Person', who is responsible for health and safety compliance (Building Safety Bill) • Landlords will need to engage tenants on safety standards including a requirement for the 'Accountable Person' to produce and implement a resident engagement strategy to promote the participation of tenants and leaseholders in decisions made about building safety risks in their building (Building Safety Bill) • Landlords (responsibility sitting with the 'Accountable Person') must produce a building safety case report which includes an explicit claim that they are managing major accident risks and evidence how exactly they are doing that. This needs to be accessible to tenants.(Building Safety Bill) • Consistency in safety measures across social and private rented housing including setting standards on smoke and carbon monoxide alarms and electrical safety 	<p>Further legislation will be passed to strengthen the Regulators consumer regulation objectives to explicitly include safety (no date as yet)</p> <p>The Building Safety Bill was introduced to Parliament on 30th June 2021. A further policy paper, Outline Transition Plan for the Building Safety bill was produced on 5th July 2021 at the request of the The Housing, Communities and Local Government Select committee. This document sets out that the complex bill is not expected to pass through Parliament in less than 9 months. following Royal Assent, it is expected that the bulk of the new provisions will come into force with 12 - 18²(Ref:)</p> <p>Further details to be included in a separate report.</p> <p>Consultation by Central Government concluded, but no further information.</p>
<p>2) To know how your landlord is performing - This theme aims to recreate strong connections between landlords and their tenants to ensure</p>	<ul style="list-style-type: none"> • The RSH will develop a set of Tenant Satisfaction Measures (draft measures included in the White paper, see appendix 1) and include repairs, building safety, engagement and neighbourhoods including ASB. The landlord is required to report these measures once agreed in a 	<p>Planned consultation on the measures expected to take place over the winter 2021/22 with Regulator publishing the final decision, measures and technical guidance in the summer of 2022. landlords will prepare systems over autumn/spring 2022 and the new measures will come into force April 1st 2022</p>

² Outline Transition Plan for the Building Safety Bill - (2021) *Ministry of Housing, Communities and Local Government*

<p>accountability and transparency and ensure landlords always consider their purpose and tenants</p>	<p>standardised, consistent and continuous way - using technology</p> <ul style="list-style-type: none"> • Landlords will also be required to publish three financial measures including management costs, senior executive salaries and executive remuneration. • Landlords will be required to name and publicise a 'responsible person' who will ensure they are complying with the consumer standards. This will be part of a broader requirement to provide clarity on roles and responsibilities of senior staff. • New access to information scheme for Housing Associations/ Registered Providers. 	<p>Sounding Board set up to look at how the measures could be implemented in practice 7th June</p> <p>No timescale is given to this requirement but the White paper states 'the Regulator will introduce this measure as part of a broader requirement for landlords to provide greater clarity on the roles and responsibilities of senior level staff. We will expect the Regulator to implement these requirements through changes to its consumer standards' (White Paper page 25). In its 2020/21 Annual Social Housing Consumer Regulation Review, the Chief Executive of the Regulator, Fiona McGregor stated "we continue to urge sector landlords to consider the steps they can take now to ensure their services and engagement with tenants meets existing requirements and to prepare now to meet the direction of travel signalled in the White Paper'</p>
<p>3) To have your complaints dealt with promptly and fairly - This theme is in response to tenants' feedback on the Green paper and Grenfell enquiry that it can be difficult to make a complaint and take too long to resolve.</p>	<ul style="list-style-type: none"> • The new Housing Ombudsman Complaint Handling Code sets out a range of measures and standards which landlords are expected to adhere to and a new type of failure orders for non-compliance. The focus is on strengthening the relationship between the Regulator and the Ombudsman and standardising timeliness and learning from complaints. Key points are: <ul style="list-style-type: none"> ▪ The democratic filter will be removed ▪ Increased publicity around the role of the Ombudsman and how to access its services 	<p>The new Complaint Handling Code came into effect on 1st January 2021</p> <p>Further legislation through the Building Safety Act will need to be passed though before the Democratic Filter can be removed. Landlords are expected to meet all the other measures contained in the Code, except for Local Authorities who can maintain their corporate timescales if suitable. This process is managed by the Council's Corporate Complaints Team.</p>

	<ul style="list-style-type: none"> ▪ Higher standards for landlord effectiveness and speed to resolve complaints. Local Authority members can, (and Reading Borough Council are), continue to follow their corporate complaints timescales 'where the process is working well'. • Complaints will be included in the new Tenant satisfaction measures • Landlords are expected to advertise the complaints procedure widely including the Housing Ombudsman services • From March 2021 the Ombudsman will be publishing on line complaints handled and outcome for each landlord and any failure orders. 	<p>Articles will be included in all future editions of Housing News and the Annual Report. Letters regarding complaints have been adjusted to meet this requirement</p>
<p>4) To be treated with respect, backed by a strong consumer regulator for tenants - This chapter outlines the changes that will be made to move from reactive regulation of the regulatory consumer standards based on the serious detriment test to active and proactive regulation.</p>	<ul style="list-style-type: none"> • The principal of Co-regulation will remain • Consumer standards to be reviewed and to include building safety and transparency as well as a Code of Practice to be produced to be clearer on what landlords are required to deliver • Proactive regulation of the consumer standards will apply to Local Authorities as well as other housing providers • Local Authorities will be expected to self-refer breaches of the consumer standard • Landlords are expected to show how they have sought out and considered ways to improve tenant engagement • The serious detriment test will be removed replaced with a proactive approach 	<p>No information on the timescale for this yet but landlords are being encouraged to self-assess against the current consumer standards</p>

	<p>to regulation including inspections³</p> <ul style="list-style-type: none"> • The notice the Regulator needs to give to a landlord to inspect the condition of its properties has decreased from 28 to 2 days • The regulator will design its approach through engaging with landlords and tenants • Landlords expected to develop a culture change to be more open and transparent • The landlord must identify a ‘responsible person’ to ensure the organisation is complying with consumer standards • The Social Housing Regulator, Building Safety Regulator and the Ombudsman will have a stronger working relationship 	
<p>5) To have your voice heard by your landlord - This theme is about landlords moving beyond involved tenants and developing tailored engagement for the wider tenant population and encouraging and supporting greater involvement.</p>	<ul style="list-style-type: none"> • Landlords are expected to demonstrate how they seek out good practice and consider how they can continually improve the way they engage with their tenants • Sector led initiatives such as NHF Together with tenants’ campaign are helping the sector to be more transparent and accessible • MHC&LG are committed to ongoing ministerial engagement • MHC&LG will deliver new opportunities and empowerment programme • Engagement is wider than just the landlord function but should incorporate neighbourhoods and communities. • MHC&LG will lead a working group to establish a review of professional 	<p>Work is already ongoing to look at and share good practice with other social landlords, in particular Oxford City Council and Wokingham Council but also regular attendance at events, conferences and workshops.</p> <p>Although the Together with Tenants campaign is designed for and applied to Housing Association Tenants, work is starting with our involved tenants to look at how it could apply to Reading.</p> <p>One of our involved tenants sits on ARCH (Association of Retained Council Housing) tenant panel and is also a member of the Housing Ombudsman Resident panel and recently took part in discussions with the Regulator on the proposed Tenant satisfaction Measures.</p>

³ Inspections will have three key stages – an annual desktop review, a new riskbased programme of routine inspections every 4 years, reactive investigations and/or inspections where non-compliance is expected

	<p>training and development to consider appropriate qualifications and standards for social housing staff including customer service focused requirements and mental health awareness</p>	<p>The Thriving communities team also works with neighbourhoods and communities</p> <p>Covid provided the opportunity to carry out more online engagement which has had mixed response.</p> <p>Further opportunities to expand and diversify our tenant engagement opportunities are being reviewed.</p>
<p>6) To have a good quality home and neighbourhood - This theme is about getting landlords to consider what a good home should mean moving away from the bricks and mortar of the Decent Home standard and looking at access to green spaces, encouraging community integration through design and tackling neighbourhood issues.</p>	<ul style="list-style-type: none"> • The Decent Homes standard will be reviewed by Autumn 2021 and will consider energy efficiency, decarbonisation and access to green spaces and communal space and tackling ASB • Focus on green spaces, green social prescribing services and impact on mental health • Encourage landlords to adopt pet policies allowing tenants to keep pets • Landlords will have to be transparent and report how they are tackling ASB • The government will clarify the different roles and responsibilities of police, local authorities and landlords have in tackling ASB and encourage landlords to inform tenants of their right to make a community trigger application • Landlords to use their knowledge of vulnerable tenants to monitor and support those at risk of cuckooing • Landlords are required to have a policy to tackle issues surrounding Domestic violence • The results of the allocation evidence collection exercise in the 	<p>The review will be conducted in two parts. Part 1 will run from Spring to Autumn 2021 and will seek to understand the case for change to criteria within the Decent Homes Standard. If the case for change is made, part 2 will run from Autumn 2021 to Summer 2022 and will consider how decency should be defined.</p> <p>This will be included in the Tenant Satisfaction Measures</p> <p>Most of these requirements are already in place under separate Policies/ Strategies (ASB Policy, DA Strategy)</p>

	Green paper will be published shortly and used to ensure housing is allocated in the fairest way to achieve the best outcomes for local places and communities	
7) To be supported to take your first step to ownership - The majority of this theme is concentrated on Affordable Homes and measures to support building more homes.	<ul style="list-style-type: none"> • The government would like to see a step change in local authority delivery of new homes • The government wants to see local authorities share experiences and good practice in housebuilding • In April 2021, the government published new guidance on how local authorities can use receipts from right to buy sales, increasing the cap on the amount per home that can be paid for by RTB receipts from 30% to 40% and extended the length of time for when the receipts need to be spent. • Reforms for leaseholders including increasing transparency on overall spend and performance, a stronger focus on managing neighbourhoods and communal spaces and better engagement 	Reading Borough Council already has a substantial Local Authority New Build programme in place, and it working in line with the new guidance on the use of Right to Buy receipts.

4.6 Regular updates on Government consultation and legislation change in relation to the Social Housing White Paper, along with Reading Borough Council's implementation of these requirements, will be provided to the Lead Member for Housing. Where required a further paper will be presented to Housing Neighbourhoods and Leisure Committee.

5. CONTRIBUTION TO STRATEGIC AIMS

5.1 The purpose of this section is to ensure that proposals contained in reports support the Council's vision and Corporate Plan priorities:

Reading Borough Council's vision is:

To help Reading realise its potential - and to ensure that everyone who lives and works here can share the benefits of its success.

- 5.2 The White paper directly correlates with Reading Borough Councils Vision as it sets out to raise the standards of Social Housing and enable tenants to feel protected and empowered by a regulatory regime and culture of transparency. The White paper extends beyond bricks and mortar to neighbourhoods and estates and ensures tenants are treated with dignity and respect

Healthy environment

- The White paper builds on the ongoing work to look at building safety ensuring every tenant feels safe in their home. It is more than safety measures but also includes the requirement that an 'Accountable Person' who is responsible for Building Safety in multi-occupied residential buildings (as set out in the Building Safety Bill) is identified who will produce and implement a resident engagement strategy for each high rise building.
- To have a good quality home and neighbourhood to live in is about getting landlords to consider what a good home should mean, moving away from the bricks and mortar of the Decent Home standard and looking at access to green spaces, encouraging community integration through design and tackling neighbourhood issues (see below - Thriving Communities).
- The Charter also contains a commitment that the Decent Homes standard will be reviewed by Autumn 2021 and will consider energy efficiency, decarbonisation and access to green spaces and communal space and tackling ASB

Thriving Communities

- The Charter references bodies of work currently ongoing including the National Policy Planning framework and Design guide, Planning white paper, NHS long term plan and access to mental health services, Framework of Green infrastructure standards, Building Better Building Beautiful Commission, Design - process and tools, Communities Strategy Action Plan, Integrated Communities' Strategy Green Paper
- At the core of the Charter is the drive to engage tenants at the heart of all decisions made regarding their homes and local communities. There is an expectation that landlords will seek out best practice and consider how they can continually engage with social housing tenants and a new opportunities and engagement programme will be open to all social housing residents to support their engagement with their landlords
- The Charter also recognises the impact of loneliness on social housing tenants and the role that engagement can take in helping to reduce feelings of isolation. In addition, the charter recognises the use of green social prescribing services in England for improving mental health outcomes, reducing health inequalities and reducing demand on the Health and social care system and the role that landlords can fulfil in helping to scale up these services through providing improvements to communal space around social homes to make places more liveable, safe and comfortable
- The charter also sets out how the Government aims to increase the supply of new and beautiful social homes and ensure that as many social tenants a possible have the opportunity to buy a home of their own

6. ENVIRONMENTAL AND CLIMATE IMPLICATIONS

- 6.1 On the 26th of February 2019 the Council declared a Climate Emergency and

resolved to act to accelerate a carbon neutral Reading to 2030. Reading Climate Change Partnership's Reading Climate Emergency Strategy 2020-25 and the new RBC corporate Carbon Plan 2020-25 was adopted in November 2020.

- 6.2 As stated earlier, the Charter sets out the commitment that the Decent Homes Standard will be reviewed, and the consultation process is due this Autumn. The review will look to consider if the standard should be updated including how it can better support the decarbonisation and energy efficiency of social homes and improve communal and green spaces.
- 6.3 The Council's existing approach for Local Authority New Build homes is to seek to ensure that where possible schemes are built to Passivhaus principles. The application of a fabric first approach of Passivhaus reduces greenhouse gas emissions and delivers significant long-term energy savings to the tenants. The low running costs and higher quality building mean that costs are significantly reduced over the life of the building for the occupiers.
- 6.4 In addition to the above, the Council is committed to delivering sites that offer a sustainable location for residents in terms of access to employment, schools, and other local services via good public transport, pedestrian and cycling networks. While seeking to encourage and support sustainable travel, where possible the scheme will provide charging points for electric vehicles.

7. COMMUNITY ENGAGEMENT AND INFORMATION

- 7.1 Council tenants have the right to information, consultation and engagement in decisions concerning their homes and local communities. The Charter sets out expectations that all social housing landlords will look to best practice and demonstrate how they have sought out and considered ways to improve tenant engagement.
- 7.2 An information campaign informing Reading Borough Council tenants of the changes and proposals contained in the White paper will take place as and when appropriate dependant on when changes are likely to be implemented.
- 7.3 In addition and as good practice, tenants will be surveyed to identify how they wish to be kept informed and/or engage with us in the future over Autumn 2021.

8. EQUALITY IMPACT ASSESSMENT

- 8.1 No EIA is required for this decision.

9. LEGAL IMPLICATIONS

- 9.1 The commitments set out in the White paper are either already covered by legislation or the Government is seeking to pass legislation to enable the commitments to be met. As a Social Housing Landlord, we will be required to meet these commitments and both the Regulator of Social Housing and the Housing Ombudsman have new, more rigorous powers to ensure that all landlords do so.

10. FINANCIAL IMPLICATIONS

10.1 There are no financial implications as a result of the publication of the Social Housing White Paper. The financial implications of implementing different sections will be reviewed at the appropriate time.

11. BACKGROUND PAPERS

- 11.1 The charter for social housing residents: social housing white paper - GOV.UK (www.gov.uk)
- 11.2 The Social Housing White Paper - Summary and Actions - Housing Quality Network
- 11.3 The Charter for Social Housing Residents - Social Housing White Paper Toolkit - Housing Quality Network
- 11.4 Social Housing White Paper - your definitive Guide - IFF Research

Appendix 1 - Draft Tenant Satisfaction Measures

Theme	Draft tenant satisfaction measures
Keeping properties in good repair	<p>Decent Homes standard compliance</p> <p>Responsive repairs completed right first time</p> <p>Tenant satisfaction with landlords' repairs and maintenance</p>
Maintaining building safety	<p>Compliance with health and safety obligations:</p> <ul style="list-style-type: none"> • Gas safety • Electrical safety • Fire safety • Asbestos • Water safety • Lift safety <p>Tenant satisfaction with the health and safety of their home</p>
Effective handling of complaints	<p>Number of complaints relative to the size of the landlord</p> <p>% of complaints resolved within agreed timescale</p> <p>Tenant satisfaction with landlord's complaint handling</p>
Respectful and helpful engagement	<p>Number of complaints relating to fairness and/or respect, relative to the size of the landlord</p> <p>Tenant satisfaction that their landlord listens to their views and takes notice of them</p> <p>Tenant satisfaction with landlord's engagement with tenants</p>
Responsible neighbourhood management	<p>% of communal areas meeting the required standard</p> <p>Number of complaints relating to communal areas relative to the size of the landlord</p> <p>Tenant satisfaction with landlord actions to keep communal areas clean and safe</p> <p>Tenant satisfaction with landlord contribution to the neighbourhood associated with their home</p> <p>Number of complaints relating to anti-social behaviour relative to the size of the landlord</p> <p>Tenant satisfaction with landlords handling of anti-social behaviour</p>
Overall	Tenant overall satisfaction with the service their landlord provides

Appendix 2 - Current proposed proactive and reactive Inspections

Still subject to consultation with tenants and landlords and other stakeholders the white paper proposes three key stages for inspections:

1. **Desk top review** - to analyse information that the regulator obtains from a number of sources to identify landlords that are at risk of potential systemic non-compliance with the consumer standards. The review will be carried out once a year of all registered landlords. Information may come from a number of sources including tenant satisfaction measures, evidence of systemic issues raised by tenants or others and information from other regulators and the ombudsman
2. **A new risk-based programme of routine inspections** - this will prioritise those providers that the desk top review has identified as high risk and will seek assurance about those landlord's compliance with the consumer standards. The regulator may inspect landlords at any time and could take account of a number of factors in deciding which landlord it will investigate. This might include:
 - Concerns highlighted in the desktop study or other information which comes to the regulator's attention
 - Any concerns about potential non-compliance with consumer standards arising from the regulator's economic regulation of providers
 - The size of the organisation (given the scale of impacts in the largest providers)
 - Providers that house the most vulnerable tenants e.g. registered providers of specialised supported housing

We expect the regulator to aim to routinely inspect those landlords with over 1000 homes every four years and make it clear when it is reassured of a landlord's compliance with its standards

3. **Reactive investigations** - such activities could take two forms:
 - where specific issues arise that need to be dealt with at a faster pace and outside the planned programme of inspections
 - Focused inspections to examine assurance of one or more landlord's compliance in delivering a specific service to tenants

Where there is a clear case of non-compliance following a routine or reactive inspection, the regulator will publish the outcome of its inspection and take appropriate enforcement action. In the case of breaches by housing associations and other private registered providers the regulator may go further and seek assurance about the adequacy of the governance arrangements.