



CT INSIGHTS: GOVERNANCE AND REGULATION

Insights from Campbell Tickell governance, strategy and regulation experts on current policy and real-world practice.

To discuss any issues covered inside email:
governance@campbelltickell.com





Editor's note

Across the UK, it has been a tough year for social landlords. We don't need to rehearse here the many factors which have combined to create headwinds: they are deeply engrained in the minds of board members and executive leaders across the sector. But throughout the UK, we continue to see our clients determinedly finding ways to rise to the many challenges circumstances present, working with passion and dedication to continue to provide much needed social housing and transform the quality of the lives of the people who live in it. The articles and notes provided in this booklet share some of Campbell Tickell's thinking about what will best equip organisations to continue to fare well.

As we go into 2024, we face the advent of a new style of social housing regulation in England which will place considerably more attention on the quality of homes and services. Registered providers will be expected to be able to demonstrate to the Regulator of Social Housing (RSH) that they meet the consumer standards, and for the first time the RSH will actively seek assurance from local authorities, as well as housing associations and for-profit providers, about regulatory compliance. In 'Consumer regulation inspection pilots - reflections and lessons for the sector' (page 4), Catherine Little, Jon Slade and I write about what local authorities and housing associations learned from a trial run with the RSH earlier this year.

Within the English regulatory regime and across the UK, attention will of course continue to be given to governance, in recognition of the fact that the buck ultimately stops with the board of any organisation. Turn to 'Building resilience in regulation and governance' (page 8) to find Greg Campbell and James Tickell's 10 top tips for negotiating present challenges while staying on the right side of regulation, while on page 19, Doug Wynne maps out how to respond should you find yourself on the receiving end of a governance downgrade.

Of course, one of the most sobering governance responsibilities for social housing boards is to ensure that tenants are kept safe. In "It couldn't happen here..." (or could it?'), James Tickell describes the social housing health and safety briefing that we have written for board members, which promotes the concept of chronic unease: a deliberately unsettling way of thinking which promotes vigilance and the resistance of complacency on the basis that prevention is always better than cure. Turn to page 16 to find out more.

Campbell Tickell's commitment to helping our clients embed good governance and navigate regulatory challenges so that they can deliver their social purpose is coded into our organisational DNA. We're very proud to have gained formal recognition of this when we became a Certified B Corporation in August. Greg Campbell explains what this means on page 13.

I hope you'll enjoy reading these articles as much as I have. I'd be delighted to discuss any aspect of what you've read and the work we do with organisations like yours - do get in touch.

All best wishes,

Ceri Victory-Rowe, Director, Campbell Tickell



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Consumer regulation inspection pilots

Reflections and lessons for the sector



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The powers contained in the recently passed Social Housing Regulation Act 2023 come in from April 2024. To help prepare, the Regulator of Social Housing (RSH) has been running pilots to develop its approach to assessing the extent of social landlords' compliance with new consumer standards – which have recently been published for consultation. By their nature, pilot methodologies will adapt, develop and change. But we think that, with that caveat, there are a number of interesting lessons for the sector to be drawn from the experiences of those who took part.

Experience of the pilots

In June 2023, Campbell Tickell convened a round table of senior leaders from housing associations and councils that had taken part in the consumer inspection pilots being run by the Regulator of Social Housing (RSH). Overall, the experience of the pilot organisations has been positive: the shared view is that the pilots are very much being used to develop an approach capable of covering the breadth of the consumer standards to a depth appropriate to the risk profile of each subject.

Pilot organisations had different experiences in terms of the level of detail that was requested. All reported the need for some interpretation of the document request, though it was recognised that this may have been in part because the RSH is still feeling its way towards what it will need to see. However, the need to interpret the request was felt particularly by local authorities, where terminology and structures are often different from the housing association sector – and across the council housing sector itself.

Varied experiences

There were differential experiences in terms of the triangulation that pilot organisations saw play out. The intention, of course, is that the RSH should be able to learn from the pilot inspections and we would expect the methodology to continue to develop before settling into a more uniform approach.

Perhaps unsurprisingly, a strong theme throughout the pilots was safety and data integrity around:

- Health and safety compliance
- More broadly around stock condition information
- Damp and mould
- Safeguarding

The regulator has been testing different ways of hearing from tenants. Some pilot organisations commented they would like to see much more of this form part of the settled methodology – both with involved tenants, and through hearing from those who are not involved.

Finally, we heard a strong message that there is a focus on the assurance received by boards and councillors, rather than on the services and homes themselves. This chimes with the co-regulatory approach taken by the regulator, which expects organisations to be well-run and to understand – and report where necessary – any gaps in assurance.

Lessons for the sector

Although inspection methods will continue to evolve, there are some broad messages for the sector about preparing for proactive consumer regulation, and about taking a good look at homes and services to check they are fit for purpose.

01 Know your tenants

- Customer insight and equality data is important in showing you understand how people experience their homes, neighbourhoods and services
- Those organisations with strong engagement in place were clear that tenants are their biggest advocates. Those developing engagement strategies and structures emphasised the importance of having a good plan in place. All agreed that it must be about more than having the ideal structure, group or strategy in place – you need to demonstrate a culture of listening to tenants and showing how their voices are heard through the governance of the organisation

- The regulator's Tenant Satisfaction Measures (TSMs) are here to stay – and it was felt they are at their most useful when used as an opportunity to start a conversation. What insight is there from the people who are least satisfied? Are there patterns around particular neighbourhoods, tenures or demographic groups? Would people who are less satisfied be able to provide any further feedback – one organisation shared that people who have made complaints are the best place to recruit to tenant engagement opportunities
- Co-produce your approach to engagement – we heard a strong message that 'scrutiny' does not need to look the same in every organisation
- Involved tenants provide hugely valuable insight, but they are unlikely to represent the full customer base. Keep a close eye on who you are NOT hearing from and think through how the board hears about complaints, compliments and other feedback. Think about other stakeholders too – how would local partners and organisations describe you?

02 Have an honest look in the mirror

- This was a strongly shared message: organisations need to make robust, evidenced self-assessment against the new consumer standards part of 'business as usual'. "It can't just be about the senior team and board / councillors," but has to involve heads of service in understanding regulatory requirements, assessing against them and providing clarity where there are gaps – and where they are being exceeded
- And when the inspectors call – be honest. It is about the journey you are on, so demonstrating you have the understanding and building blocks in place is key. "You know where your problems are and have plans to address any weaknesses – they took assurance from that".

03 Good quality data and robust assurance matter

- There was a level of surprise at the inspection focus on board / council papers and information, rather than testing out services directly. It became apparent that this isn't consumer regulation through a governance standard lens. Instead the approach demonstrates the regulator's consistent focus on the responsibility of senior leaders to obtain assurance that key things are happening as they should be. In particular, the RSH wants to see that the governing body is seeing the same picture as that told through the various sources of tenant insight (e.g. TSMs, complaints data and other feedback)
- Pilot organisations noted the importance to the regulator of external assurance (i.e. independent checks and advice) in demonstrating openness to challenge and a continually developing understanding of what 'good' looks like
- Assembling a simple, coherent, comprehensive assurance framework spanning all your activities, and having clear and realistic plans in place to address any gaps in assurance and drive improvements, may provide the shortest route to a good inspection outcome

04 And finally...

Don't take the experience of the pilots as a forensic definition of the way inspection will go! The process will continue to evolve as the regulator learns and develops its approach. However, we feel the lessons described above will remain relevant as the consumer standards and the inspection methodology change and evolve.

Building resilience in regulation and governance

10 top tips to help ensure providers negotiate the current challenges while staying on the right side of regulation



Greg Campbell

Partner,
Campbell Tickell



James Tickell

Partner,
Campbell Tickell

As the wider environment in which housing providers operate has become more challenging, the expectations placed on boards and executives have increased. The demands of housing regulation are not getting any easier either.

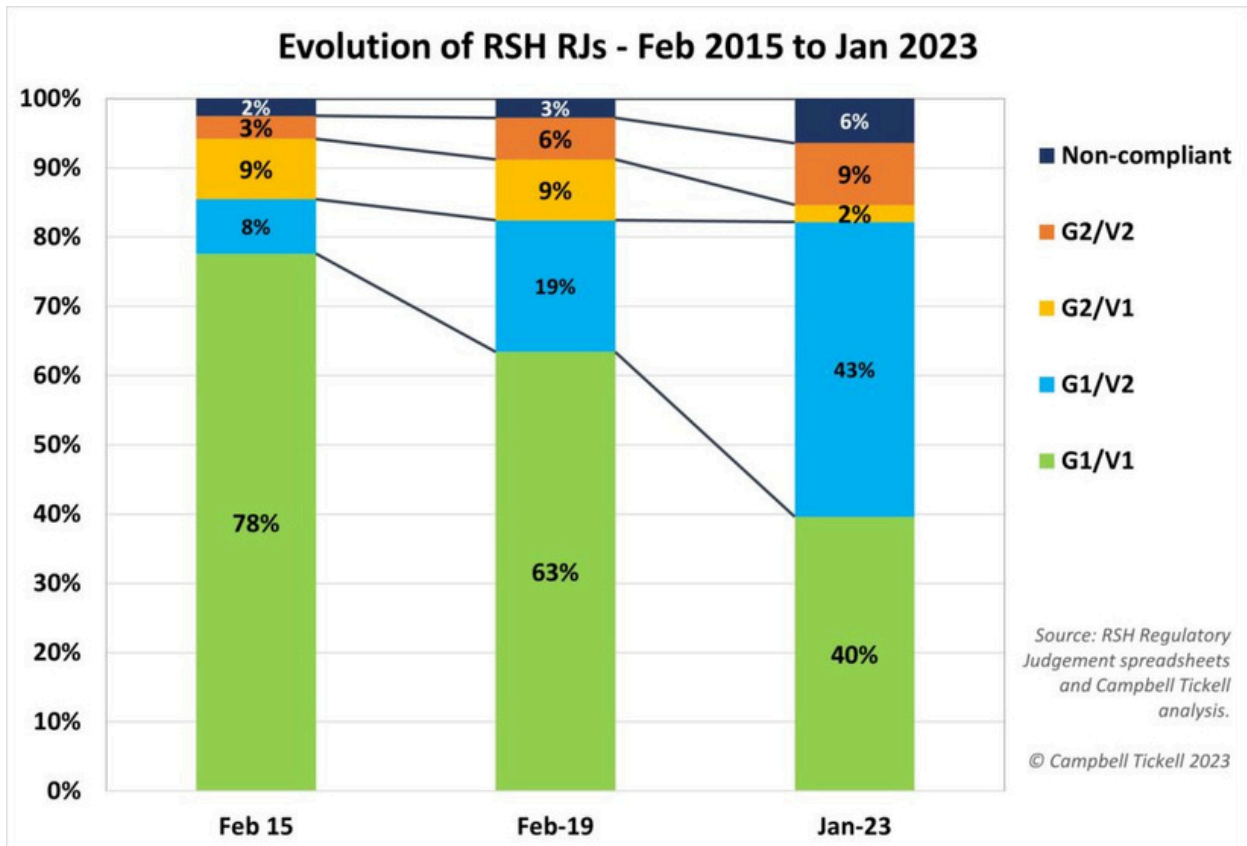
Range of challenges

It is not hard to identify the challenges: Brexit, COVID-19, Russia's Ukraine war, fuel price rises and cost of living crisis, housing demand unsatisfied and increasing homelessness. These challenges affect a range of sectors. But for housing in particular, there is the legacy of regulation being scaled back by the government to focus on the governance and financial viability of housing providers. Then there is the turnaround in customer expectations following the Grenfell Tower disaster and the problems of poorly maintained homes, highlighted by the media and the Housing Ombudsman.

Regulatory issues

Much of this regulatory gap will be addressed by the Social Housing Regulation Bill. Even without that though, regulatory attention has identified problems of varying kinds with a sadly growing number of registered providers. The table illustrates this, based on regulatory judgements from the Regulator of Social Housing over the past eight years.

Particular issues will of course have contributed to the halving in the percentage of housing providers achieving G1/V1 grades. One obvious aspect would be the sense that, for those active in development and sales markets, 'V2 is the new V1' – due to the increased exposure to development risk and house price fluctuations. But the growth in the proportion of non-compliant housing providers is striking.



10 top tips

How can providers ensure they negotiate the macro-environmental road bumps, while continuing to deliver what they are there to achieve, meeting residents' and stakeholders' reasonable expectations, and in the process staying on the right side of regulation?

Campbell Tickell works extensively in the areas of regulation and troubleshooting. We have supported a considerable number of housing providers on their improvement journeys. Here are our 10 top tips based on our experience.

2

1

Keep it simple

Unnecessary complexity of group and staff structures creates vulnerability. Streamline and simplify to stay safe, and create clear lines of decision-making and accountability.

Stay fresh, stay diverse

Longstanding board members and executives can become stale and complacent. Leaders who understand organisational history are important, but good boards exhibit diversity of thought and other characteristics, fresh thinking, positive challenge and regular injections of new skills.

Don't believe your own propaganda

3

When problems arise, boards and executives often cling to inaccurate, even delusional, narratives of future success, long after events have revealed their deficiencies. When something has gone wrong, organisations must be honest with themselves, even if that is painful: understand the problem and you can start to address the changes needed.

Watch the canaries in the coal mine

5

4

Look out for the problem warning signs: complaints from tenants; whistleblowers; persistent negative performance trends; or fractiousness among the board. If arrears or complaints are up, or answers to straightforward questions not forthcoming, find out why. Tenants are the first to spot things going wrong on the frontline – listening to them always pays off.

Avoid risks you don't understand

When organisations get into new activity, their leadership needs new skills and experience. It is not enough to place an item on the risk map: leaders must understand what it means and its potential effects. Put resilience ahead of over-ambitious development plans or over-stretched risk appetites.

6

Model the culture you want

Boards and leaders need to understand and own the culture they have created, and seek to change it when needed. Where problems are disregarded or dismissed, for example, this can lead to poor service delivery and lack of compliance. Where people do not feel they can speak up safely and be heard, it will take longer to identify problems and put them right.

7

Trust but verify

Between the scrutiny of boards and committees, comprehensive assurance is needed that the facts presented are accurate. Executives must accept challenge and questioning as an indicator of good governance, along with the support they also deserve. Dishonesty, corruption and fraud are rare in the social housing sector. But the price of this must be continuing vigilance.

8

Be relentless on data integrity

Many compliance failures spring from outdated and overlapping data sources, allowing properties (for instance) to slip off gas or electrical safety registers, or develop unremedied severe damp. Post-merger data integration can also cause problems. Some organisations' failure to comply with the regulator's Rent Standard (a growing number) can arise at least in part from not maintaining a definitive, up-to-date and accurate data set.

10

9

Know your counterparties

Most housing providers outsource some activities, because they do not have the internal skills and resource or because that is central to their business model. Certain services will almost always be delivered by external specialists. Some organisations have, however, hit problems because they have engaged with unsuitable counterparties, whether investors, developers, housing managers or repairs contractors. Before engaging any third party, it is crucial to conduct proper due diligence, be clear on their financial and operational robustness, and understand the terms of business.

Remember: the buck stops with the board

Governance is the root of every regulatory problem case, whatever the presenting issues. When things go wrong, there are no excuses: if a board was misled, it should have had the systems, controls and assurance to prevent that. Good governance is the first, strongest line of defence. Good board members, meetings, papers and challenge all matter. Pay attention to codes, guidance and standing orders. Reflect and learn from any emerging problems, and make sure you jump the right way. Listen to the regulator and be honest with them – they may be your best (if critical) friend. Most problems can be resolved quickly if decisive action is taken.



Navigating the new world of Consumer Regulation

Campbell Tickell is ideally placed to help housing associations and local authorities map a changed pathway through regulatory compliance and engagement.

Building on our established IDA preparation service, we can provide a range of support with consumer regulation: from deep dives into specific areas of service delivery or practice, through assurance mapping exercises, to preparing organisations for inspection.



Why call on us?

- We have unrivalled experience of social housing regulation and practice
- We're pragmatic and sensible
- We care about outcomes for customers as much as you do

**FIND OUT HOW
WE CAN HELP:**

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CT becomes a Certified B Corporation

CT is proud to have joined a global community of businesses that meet high standards of social and environmental impact



Greg Campbell

Partner, Campbell Tickell

When Campbell Tickell reviewed what it meant to be a Certified B Corporation, we quickly concluded that the description fitted us – making it natural that we would seek certification. Now, after two years of hard work, we have made it, and we became a Certified B Corporation this August.

What is a B Corp?

The term stands for ‘Benefit Corporation’. It is a sustainability certification for commercial businesses that strive to make social and environmental priorities an integral part of their operations. It is a recognition that, while staying financially healthy is as important as for any other business, a company recognises that it has wider responsibilities at the same time – to people, communities and the planet – and must not compromise those sustainability goals.

While CT is a commercial business, making a positive impact on society has been central to the company’s mission and values from day one. Our mission is to support our clients’ excellence in governance, resilience, performance, and compliance. This enables the better delivery of clients’ social objectives for the people, communities, and organisations they serve.

Underlining the company’s commitment to use business as a force for good, certification aligns with our belief that our operations should bring benefit not just to shareholders, but to all stakeholders: a belief shared by many of the public sector, non-profit and charitable organisations CT supports.

Accreditation is not easily achieved

While we believed that our approach aligned with B Corp principles, we had to demonstrate this. It meant answering 161 questions, setting out how we operate in five categories: governance, workers, community, environment, and customers.

In the process, we had to go through a lot of tidying up of our policies and practices and our record-keeping, to enable us to demonstrate clearly how our operations work in practice.

Assessment of B Corp applications is undertaken by the B Lab organisation. In order to achieve certification, an applicant company must score a minimum verified score of 80 points. The median score for businesses completing the B impact assessment is 50.9. CT scored 107.5 at our first effort.



Maintaining B Corp certification

A company must go through a reaccreditation process every three years. And you can lose certification, as happened recently to a well-known brewing company whose employment practices were called into question by a large number of former employees.

Meanwhile, CT is in good company. The B Corp community comprises 7,132 companies around the world, including 1,500 in the UK. It includes such names as The Guardian, Body Shop, Ben & Jerry's, Pieminister, Cotopaxi, ACS (Advanced Clothing Solutions), Y.O.U Underwear, teapigs, Audley Travel, and EQ Investors. Certified B Corporation organisations in the social housing arena include Social Invest and Centrus.

Commenting on achieving certification, James Tickell, partner, noted:

"I think Campbell Tickell's values clearly aligned with B Corp certification before we'd even heard of the term. It's great now to have the recognition for our amazing team that certification brings, after a truly rigorous verification process".

Ceri Victory-Rowe, director, said of the certification process:

"We found going through the process itself very valuable – it made us revisit how we do things, and thoroughly test whether we truly reflect our values in how we work. It was rewarding to realise all over again what a committed and ethical bunch of people we work with at CT. And on a more practical level, the process prompted us to do some housekeeping, updating documents and so on – so we know our house is in even better order going forwards."

“It couldn’t happen here ...” (or could it?)

Social housing may not carry the same risks as deep sea diving but the health and safety of tenants is a vital issue for providers. A new briefing from Campbell Tickell equips boards with the knowledge they need to truly put safety first



James Tickell
Partner, Campbell Tickell

‘Health and safety gone mad’ is a familiar trope from certain newspapers – narratives of mollycoddling, bureaucracy and pointless prohibitions. Yet when things do go wrong, and people are hurt, the very same commentators are equally keen to point the finger of blame. The recent tragedy of the sightseers to the wreck of the Titanic is a sad case in point. Suddenly it becomes clear that over the years, there had been warning signs, would-be whistleblowers and trenchant questions about the suitability of designs and equipment.

In social housing, we’ve had our own tragedies and disasters too. There were the Lakanal House and then Grenfell Tower fires, the sad death of Awaab Ishak and any number of less media-prominent issues involving fires, damp and mould, asbestos, carbon monoxide, personal safety and more besides. Lessons are always learned, of course, but too late for those who have suffered or lost their lives.

Where the buck stops

And for all of these sad events, the buck always stops with the senior executives, the board members, trustees, company directors – however they are referred to. In law, that is very clear, and the ultimate sanction is that of a corporate manslaughter charge, backed up by the possibility of unlimited fines for certain offences.

For board members, these are sobering responsibilities. Of course, they can’t all be experts on health and safety. And, of course, they will need policies, committees, expert staff and external advisors to back them up. But they do need to know what questions to ask, and when to carry on asking those questions until they have good assurance, as opposed to just reassurance.

Campbell Tickell has now produced a briefing which aims to equip board members with an overall understanding of some key issues, and a good set of questions for them to pursue. It is literally true to say that the briefing has more questions than answers, as it sets out the areas where relentless board member curiosity is vital.

'Chronic unease'

In the briefing, we introduce the concept of 'chronic unease' in relation to the governance of health and safety. This may sound unsettling, but it has a solid track record from safety-critical industries such as deep-sea mining, quarrying and aerospace.

The five key features of chronic unease are:

1. A tendency to worry about health and safety
2. Vigilance – awareness of near misses, local failures
3. Resisting complacency
4. Imagination to visualise unfavourable scenarios
5. Flexibility, systems thinking, not jumping to conclusions



The lessons are simple. Don't necessarily believe all that you are told or read. Understand what the risks are, and don't be afraid to ask questions. Ask yourself what else could be done, or what might have been overlooked. Just because things have worked so far, doesn't mean they'll work going forward – very few systems are 100% reliable.

Learn from tenant complaints, mistakes and near misses, whether your own or those of others. And when things seem to be going well, keep an eye on the telltale minor issues, as they are the proverbial canaries in the coal mine.

Safety first

Social housing may not bring the extreme risks of deep-sea exploration, but the health and safety (and sometimes lives) of millions of tenants and employees – including some very vulnerable members of society – depends on our effective performance in this area.

Prevention is always better than cure, and the inevitable benefit of hindsight after an adverse event is cold comfort for those involved. We hope that our briefing can contribute in some small way to enhancing that vital culture of truly putting safety first.

Board training

Campbell Tickell would be pleased to present the paper to boards and/or committees, either online or in person. This can be offered for between one hour, up to a more interactive half day session, with two hours recommended.

To find out more please contact us: James Tickell, Partner at Campbell Tickell or Catherine Little, Director at Campbell Tickell or call: 0208 830 6777



Sue Harvey
Director, Campbell Tickell

In Depth Assessment support

In Depth Assessments (IDAs) continue to evolve and will change further as new Consumer Regulation is rolled out. Recent changes include a greater focus on stock condition, stress- testing, recovery planning, and building and resident safety. Campbell Tickell has helped more than 100 housing associations build the confidence of their non-executive directors and executive team, and to deliver clear assurance to the Regulator.

Preparing for in depth assessment – helping you to shine

Our services cover:

- Introductory presentations and interactive workshops for Boards;
- Reviewing and refreshing key documents to help shape your narrative;
- Rehearsing and coaching interviewees to confidently describe your ambitions, structures and risks;
- Identifying areas of strength and opportunities for improvement ahead of scrutiny by the Regulator [SH1] of Social Housing;
- Critical friend input on key elements such as document mapping, briefing notes, stress-testing and risk management;
- Post-IDA remedial support.



Delivering clear assurance to the housing regulator

Our IDA clients include: for-profits, supported housing and recently merged providers, plus several of the pilots for the new consumer inspection regime.

Over 80% of the RPs we have supported have achieved a positive IDA outcome in retaining or improving their G/V grading. For others, our advice has been key to delivering a clear and focused action plan that addresses regulatory concerns and builds RSH confidence, supporting a rapid return to the previous grading.

Alongside our support to prepare for inspection, we can provide a range of assistance to prepare social landlords more broadly for the changes to regulation – including self-assessment, 'health checks' and developing your approach to assurance.

Find out how we can help:

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How to respond to a G2 downgrade

Receiving a governance downgrade from the Regulator of Social Housing should be seen as an opportunity for change and improvement



Doug Wynne

Senior Consultant, Campbell Tickell

A downgrade of your organisation's governance rating by the Regulator of Social Housing (RSH) is never a welcome development. But if it is responded to appropriately, it can be a catalyst for change and improvement.

What does a G2 rating mean?

A G2 grading means your organisation remains compliant with the Regulatory Standards. As the RSH definition says: "The provider meets our governance requirements but needs to improve some aspects of its governance arrangements to support continued compliance."

A G2 grading usually arises from one or more of the following issues:

- An acute compliance issue (e.g.: rents; health and safety; stock condition; complaints)
- Failure to manage key financial or strategic risks (e.g.: loan covenant compliance; stock reinvestment; sales or subsidiary performance)
- General governance weaknesses (e.g.: in areas such as: control and assurance; risk management; equality, diversity and inclusion; data integrity; stress-testing; performance reporting; board composition and effectiveness; third-party arrangements)

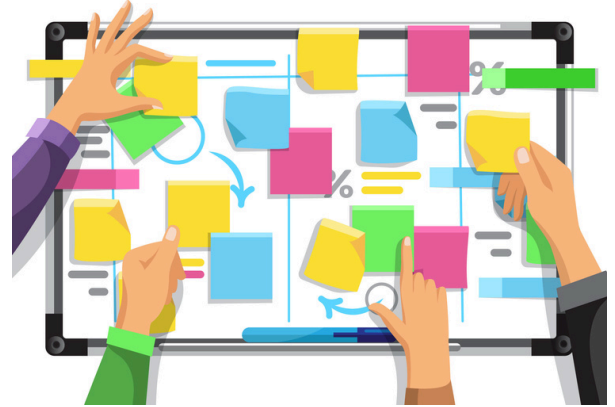
In the near future it is probable that there will be G2 downgrades arising from more general service delivery issues as the RSH rolls out its revised approach to Consumer Regulation.

Action plan

To resolve the G2 situation and return to a G1 grading, your organisation will need to establish the extent of the issues and design and implement an action plan to address them.

In establishing the extent of issues and your approach to resolving them, consider the following questions:

- What are the presenting issues?
- Are those issues repeated elsewhere in the organisation or its services?
- What are the underlying causes?
- Does the board and RSH have full details of the situation?
- Is further investigatory work required?
- What are the impacts (if any) on customers, financial viability, service delivery, funding, lending and reputation?
- Does the organisation have sufficient capacity and skills at board level to resolve the situation?



In designing and implementing an action plan your organisation should:

- Ensure board leadership of the resolution of issues – a board-led working group or task and finish group to oversee delivery of a resolution plan is usually a very good idea.
- Adopt and resource a project management approach – a project management approach is essential as your resolution plan is likely to involve different strands of work proceeding at different paces. Ensure sufficient project management resources are in place.
- Establish whether there is a need for additional support – whether independent specialist consultants, additional staffing or board resources.
- Draw up a full and detailed action plan setting out:

- a) Actions
- b) Owners
- c) Timescales
- d) Success measures
- e) Dependencies
- f) Key milestones
- g) Risk management arrangements
- h) Progress reporting

- Ensure that regular reporting of progress to the main board and to the RSH is in place. Agree with the RSH what information they wish to see and when.

The resolution process has three main phases that your action plan should encompass:

01

Making necessary changes – in areas such as policy, practice, people, systems, performance reporting, assurance mechanisms and board oversight.

02

Embedding those changes – so that the organisation can demonstrate it has learned lessons for the future, that the revised approach has become business as usual and that intended improvements have been achieved. This is an important phase of the process and it can be both difficult and take time to deliver.

03

Demonstrating full compliance with the Regulatory Standards – the RSH will take a holistic approach to reviewing progress and overall compliance with the standards. If there are any additional regulatory issues, the RSH is likely to roll those up with the existing G2 concerns and will require they are all resolved before an upgrade will be considered.

Top tips

- Avoid doing things in a rush
- Set realistic, achievable timescales
- Ensure both presenting issues and underlying causes are addressed
- Don't assume the RSH will tell you what to do
- Maintain a positive working relationship with the RSH
- Establish clear lines of communication and progress review milestones with the RSH
- Have a positive story to tell to media and key stakeholders, including your customers

By following the right steps in responding to a downgrade, your organisation can use it as an opportunity to improve and return stronger for the experience.

RENT SETTING



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