

# Mind's written submission to the consultation on 'A new deal for social housing'

November 2018

## About Mind

- 1 We're Mind, the mental health charity for England and Wales. We believe no one should have to face a mental health problem alone. We provide advice and support to empower anyone experiencing a mental health problem. We campaign to improve services, raise awareness and promote understanding. For more information, please contact Ellie White, Senior Policy and Campaigns Officer, at [e.white@mind.org.uk](mailto:e.white@mind.org.uk) or on 020 8215 2244.

## Introduction

- 2 Mind welcomes the opportunity to respond to the Government's social housing green paper. We were pleased to see the breadth of issues it covered and hope this submission marks the start of a conversation about improving social housing for people with mental health problems.
- 3 At Mind, we seek to include people with lived experience of mental health problems in every step of our work. As part of our broader work on social housing we ran five focus groups with people with mental health problems between August-September 2018, and invited campaigners to submit their responses to the Green Paper questions to us and to the green paper team. This response draws on feedback from both focus group participants and our campaigners who engaged with the Green Paper; over a hundred people with mental health problems have contributed. We have included verbatim quotes from focus group participants and excerpts from campaigners' responses to the consultation to illustrate their and our points. Where absolutely necessary for comprehension we have changed the spelling and punctuation of comments.
- 4 Several key themes came out of our discussions with people with mental health problems:
  - quality of social housing
  - stigma (about mental health, from housing professionals and neighbours)
  - lack of faith in the complaints process
  - difficulties accessing social housing in the first place.
- 5 While some of these issues are covered by the green paper and its consultation questions, we're disappointed that the questions don't allow us to go into detail about the reality of the experience in social housing of people with mental health problems. We have only answered questions of particular relevance to people with mental health problems, or where we could offer our expertise, but we've included additional information or context where possible.
- 6 We also surveyed local authorities over summer 2018 to find out more about how they are catering to people with mental health problems in their allocations policies, and how much data they have on

tenants and prospective tenants with mental health problems. The responses gathered through this survey are used anonymously in our submission to the questions in Chapter 4. The majority of this survey, however, focused on allocations. As this is outside the scope of the consultation questions we look forward to meeting with the relevant team at the Ministry to discuss our findings on this matter separately. Our methodology is explained in more detail in Appendix 2.

### Summary of recommendations

- 7 Below is a summary of our recommendations, grouped by issue. In some cases these recommendations span more than one chapter so they are listed in the both chapters' introductions.

#### Decent Homes

- I. Recommendation 1: Government should implement housing safety measures equally across all tenures, and should expand the Decent Home definition to reflect a modern, holistic understanding of a 'decent home' including safety, security, and the quality of the external environment.
- II. Measures should be taken urgently to ensure all social homes are safe and decent. Local authorities must stamp out non-decent homes within their housing stock, and hold any registered providers of social housing in their areas to the same standard. Local authorities should be supported to do this, including through funding for additional inspections and improvement works.
- III. Government should take a broader approach to creating safe, decent, desirable social housing, which embeds a whole person approach in this work.
- IV. A Decent Homes inspection should be carried out by local authorities at the end of each tenancy to ensure no one is offered, and therefore feel compelled to accept, a poor quality home.

#### Complaints and advice

- V. Government must ensure the development and widespread dissemination of high quality housing information and legal rights guides for social housing tenants.
- VI. Government should introduce guidance requiring social housing providers to respond to all complaints within a certain time period, encouraging them to recruit enough staff to be able to do this, and standardising the complaints processes across social landlords.
- VII. Government should develop a bespoke advocacy, advice and complaints service for social housing tenants, with a particular focus on people with mental health problems living in social housing.
- VIII. Government should co-create, in partnership with social tenants, a new, independent complaints body.

#### Key performance indicators

- IX. Government should expand proposed key performance indicators (KPIs) to include the factors that are important to people with mental health problems including: crime, safety, communication, staff training and treatment of tenants with mental health problems. A KPI to measure good neighbourhood management must consider the factors important to people with mental health problems: safety, cleanliness and community cohesion. Government must work with the sector, including Mind, to design and evaluate anti-social behaviour KPIs that do not

discriminate against people with mental health problems. We would also like to see Government work with Mind to develop a mental health specific KPI and award for high performers. Social value delivered by social landlords should be measured, and best practice should be shared and celebrated.

- X. The Regulator of Social Housing's powers should be strengthened to encourage good performance against the KPIs, and expanded to include scrutiny of local authorities.
- XI. Social landlords should publish their performance against the KPIs annually, to the Regulator. This should be done cautiously, given the concerns of people with mental health problems.
- XII. The Regulator should be given the power to produce further Codes of Practice, and should develop a Mental Health Code of Practice.

#### Tenant engagement

- XIII. Tenants should be involved in regular reviews of social housing KPIs, and inclusion of harder to reach groups should be included in all engagement metrics and initiatives. Further, residents groups, including those with mental health problems, should be supported to regularly scrutinise the definition of a Decent Home and to encourage a holistic understanding of a good home.

#### Stigma

- XIV. Government should work with the sector, and Mind, to gather evidence on mental health stigma in the social housing sector and to develop strategies for stamping it out. Local authorities should introduce zero tolerance policies for poor treatment of people with mental health problems or displays of stigmatising attitudes, with support of Government.
- XV. Government should develop training programmes for local authority staff about stigma and social housing. Local authorities should also commit to ensuring all housing and front line staff receive adequate training on interacting appropriately with tenants, including people with mental health problems.
- XVI. Government should co-create locally tailored anti-stigma programmes with social tenants and residents' organisations.
- XVII. Government should produce guidance to standardise mental health policies in social housing, including collecting data around allocations, evictions and waiting lists.

#### Background: housing and mental health

- 8 Where you live can have a huge impact on your mental health – everyone needs safe, stable and suitable housing to stay well. Our 2017 report [Brick by brick](#) shows the devastating impact the housing crisis is having on people with mental health problems in the UK. High quality, stable housing is key to maintaining good mental health and is important for recovery if someone has developed a mental health problem. And yet, people with mental health problems are much more likely to live in poor quality accommodation. There is more information about the link between housing and mental health in appendix 1.
- 9 Social housing should be a viable and reliable option for people with mental health problems who could benefit from the relatively settled tenure and the option for increased support that social housing can

provide. Instead we know that there are many issues that prevent social housing from being the haven that it should be. For example, the report showed:

- The process of seeking housing support from a local authority can be an incredibly stressful experience – in some cases causing or exacerbating mental health problems.
- Stress caused by housing insecurity or substandard accommodation can exacerbate people's vulnerabilities, worsening their condition or increasing the likelihood of relapse and/or the need for inpatient admission
- Stigma amongst housing association staff can lead to people with mental health problems being allocated the worst housing stock or not being allocated the housing they need to stay well.
- People with mental health problems have anti-social behaviour rules enforced far more severely than those without (so are lower down priority lists or considered unsuitable tenants.) There are double layers of stigma for black and minority ethnic people and lesbian, gay, bisexual, transgender and queer people with mental health problems.

10 According to Money and Mental Health Policy Institute's *Where the heart is*, more than a third of people who live in social housing have a mental health problem, and social housing is the tenure which houses the largest number of people with mental health problems<sup>1</sup>. This is not surprising as we know people with mental health problems are more likely to have lower incomes, less likely to own their own homes (only 18 per cent do), and more likely have additional support needs than the general public. This finding underlines the fact that many people with mental health problems are living in general needs housing - this issue goes beyond supported housing, and should be at the forefront of thinking about the future of social housing.

11 We surveyed 1,700 people with mental health problems in February 2018 and found that 43 per cent of people currently living in social housing said it had made their mental health worse. This is an unacceptably high proportion. The survey also highlighted some of the specific issues people with mental health problems are having with their homes: 28 per cent were in rent arrears, and 27 per cent had problems with their Housing Benefit (or Universal Credit). This is particularly concerning given that 190 councils disqualify households from their waiting lists if they're in rent arrears, and that 4,900 of 5,800 local authority evictions in 2016/7 were the result of rent arrears.<sup>2</sup>

12 48 per cent of people with mental health problems had experienced stigma in their current social housing, whether this was from neighbours, housing professionals, landlords, family or friends. An even higher proportion - 62 per cent - of people with mental health problems told us they'd experienced advice and support issues in their current housing. The main problem was difficulties understanding their housing rights, as well as difficulties getting advice about how housing can impact mental health, difficulties getting advice about how to navigate the housing system, and difficulties getting legal help if needed. This paints a concerning picture which shows the social housing system is routinely failing people with mental health problems.

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<sup>1</sup> Money and Mental Health Policy Institute, *Where the heart is: social housing, rent arrears and mental health* (April 2018) available here: <https://www.moneyandmentalhealth.org/wp-content/uploads/2018/04/Where-the-heart-is-social-housing-rent-arrears-and-mental-health.pdf>

<sup>2</sup> Local Authority Housing Statistics data returns, England 2016-17. Available at: <https://www.gov.uk/government/statistical-data-sets/local-authority-housing-statistics-data-returns-for-2016-to-2017> (tabs C and F)

## Chapter 1 - Ensuring homes are safe and decent

### Somewhere you can feel safe physically, emotionally and psychologically.

- 13 Poor quality homes impact people's mental health, so we welcome this opportunity to improve the standard of homes in the sector, and to clarify what a 'decent home' is for a person living with mental health problems. Whilst discussing social housing in general, and the questions in this chapter in particular, people with mental health problems have identified numerous concerns. This included the quality of properties themselves, the quality of repairs, their local areas and their neighbours: the responses ranged from the very basic need for it to be safe, to the more ephemeral 'feels like home'.

#### Mind recommendations

**Recommendation I:** Government should implement housing safety measures equally across all tenures, and should expand the Decent Home definition to reflect a modern, holistic understanding of a 'decent home' including safety, security, and the quality of the external environment. This includes:

- a. replacing 'reasonable degree of thermal comfort' with detailed, objective measure of thermal comfort, to remove any element of indecision, and to better hold landlords to account under the HHSRS.
- b. outlining standards for the quality and punctuality of repairs, and quality and maintenance of utilities such as water, gas, electricity.
- c. exploring vetting of contractors to ensure a high quality of workmanship.
- d. reflecting the need for appropriate acoustic materials in new builds and conversions, and the increasing awareness of the impact of noise pollution on mental and physical health.
- e. including updated guidelines for room size, in accordance with regulations about room sizes in houses of multiple occupancy, and whilst bearing in mind the impact room size has on mental health.
- f. including factors that an individual reasonably feels is crucial to their understanding of a safe and decent home.

**Recommendation II:** A Decent Homes inspection should be carried out by local authorities at the end of each tenancy to ensure no one is offered, and therefore feel compelled to accept, a poor quality home.

**Recommendation III:** Measures should be taken urgently to ensure all social homes are safe and decent. Local authorities must stamp out non-decent homes within their housing stock, and hold any registered providers of social housing in their areas to the same standard. Local authorities should be supported to do this, including through funding for additional inspections and improvement works.

**Recommendation IV:** Government should take a broader approach to creating safe, decent, desirable social housing, which embeds a whole person approach in this work.

**Question:** Should new safety measures in the private rented sector also apply to social housing?

- 14 Yes, housing safety measures should be implemented equally across all tenures: safety should be consistent across all homes, irrespective of tenure type. This is particularly the case given the fact many people are forced to reside in certain tenures due to circumstances out of their control – for instance, supply, income or location.

**I would expect that my home was secure, maintained to a standard which meets the requirements of legislative frameworks surrounding housing provision and qualitative standards. In other words social housing should meet the same exacting standards as private housing. Safety, security, warmth, etc.**

**Question:** Are there any changes to what constitutes a Decent Home that we should consider?

- 15 People with mental health problems told us what the term 'safe and decent' mean to them. Responses included issues with the physical state of the property, meeting safety standards and security and stability.

Issues with the physical state of the property

- 16 People with mental health problems most frequently told us that a decent home needs to be warm, dry, free from damp and both cool in summer and warm in winter. Heat standards are already fundamental to the Decent Homes Standard, but we've heard repeatedly from people whose social housing does not meet this criteria. This indicates that the measure of a 'reasonable standard of thermal comfort' is too subjective, as shown by the reminder in the Standard that even if the heating is technically efficient and effective enough to make a dwelling acceptable, 'under the HHSRS a landlord must be sure that the home is warm enough for the occupant'. We know that improving the heating of a home is a key way to improve a tenants' mental health, so it's essential this is taken seriously as a public health matter.<sup>3</sup>
- 17 **Recommendation: This element of the Decent Homes Standard should be replaced with a detailed, objective measure of thermal comfort, to remove any element of indecision, and to better hold landlords to account under the HHSRS.**
- 18 Related to this, standards should be set outlining the necessary quality and punctuality of repairs, and vetting of contractors to ensure a high quality of workmanship. Numerous complaints were made in

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<sup>3</sup> Department for Communities and Local Government, A Decent Home: Definition and guidance for implementation, (June 2006 – Update), Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7812/138355.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7812/138355.pdf), p.18

focus groups about the quality of repairs delivered by housing providers. One participant labelled the tradespeople “cowboys” and complained about how these essential services had been outsourced. Other participants focused on the impact that unreliable tradespeople had on their stress levels:

**There are a lot of problems with repairs...they just mess you around...they stress you out and get you really run down.**

**My last complaint is the poor standards of work, materials and communication from the HA [housing association]. On the whole things are fine and the upstairs tenant has improved over the years but things were better in the past when the HA was smaller and more caring.**

- 19 Focus group participants told us of social homes being presented to potential tenants in shocking states. Often, people had seen numerous properties already and lost out (due to bidding processes or their priority level), leaving them vulnerable and desperate, and willing to accept even the worst properties to avoid homelessness.

**The condition... it hardly had any flooring, there were tiles missing so you could actually see the dirt. There was no kitchen, just a sink and a cupboard under the sink. They said the condition that you see it is the condition that you take it. I thought they'd do it up a little bit but no. You take it or leave it. Six people before me said no so I took it. I slept on the floor in a sleeping bag.**

- 20 Stories like this were common amongst focus group participants. Other complaints about properties managed by a range of social housing providers include rodent infestations, black mould and damp. These are homes that should be meeting the Decent Homes Standard. Much more needs to be done to support local authorities and social housing providers to renovate existing social homes, with more robust and timely action taken against those who still have non-decent homes in their stock. We know that people with mental health problems are being allocated the least desirable homes, potentially because they don't have the social capital, self-esteem or energy to refuse.

- 21 **Recommendation: a Decent Homes inspection should be carried out at the end of each tenancy to ensure no one is offered, and therefore feels compelled to accept, a poor quality home.**

- 22 Noise came up as a quality issue for many people – specifically the ability have a quiet, private environment to return home to.

**In my experience social housing does not have enough sound proofing in its properties. I've experienced this problem in every place I've inhabited in social housing.**

**One must be able to enjoy living there in quiet enjoyment without harassment.**

**23 Recommendation: The sound-proofing regulations in the Decent Homes Standard should be updated to reflect the need for appropriate acoustic materials in new builds and conversions, and the increasing awareness of the impact of noise pollution on mental and physical health.<sup>4</sup>**

24 There were also mentions of the importance of well-proportioned rooms and sufficient rooms, which allow people privacy and independence. Adequate space is critical for people with mental health problems - and we know that this is not just an issue in the private rented sector.<sup>5</sup>

**A decent home should have rooms with enough space for a family to share, but also be private if they need.**

**25 Recommendation: We recommend that the Decent Homes Standard is updated to set out detailed minimum room sizes, in line with recent regulations about room size in Houses of Multiple Occupancy, and whilst bearing in mind the impact room size has on mental health.<sup>6</sup>**

#### Meeting safety standards

26 Many respondents said a structurally sound home, which adhered to legal standards for fire safety in particular, was key to having a 'decent home'. Many explicitly mentioned legal standards and checks, indicating support for a robust system of regulation. Many people also felt that a decent home definition should explicitly include the basics of hot, running water, electricity, and gas/electric cooking facilities. People expressly pointed out that these utilities should be properly installed and regularly assessed for safety.

**You should feel confident that your home is safe and regularly checked and maintained from a fire, gas and electrical safety point of view.**

**27 Recommendation: the Decent Homes Standard should be updated to include more thorough reference to the necessary quality and maintenance of these utilities.**

#### Security and stability

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<sup>4</sup> All Party Parliamentary Group on Healthy Homes and Buildings, White Paper (October 2018) available at: <https://healthyhomesbuildings.org.uk/wp-content/uploads/2018/10/HHB-APPG-White-Paper-V1.pdf>, citing UK Green Building Council, Health and Wellbeing in Homes report (July 2016). Available at: [https://www.ukgbc.org/sites/default/files/08453%20UKGBC%20Healthy%20Homes%20Updated%2015%20Aug%20\(spreads\).pdf](https://www.ukgbc.org/sites/default/files/08453%20UKGBC%20Healthy%20Homes%20Updated%2015%20Aug%20(spreads).pdf)

<sup>5</sup> Diggle, J., Butler, H., Musgrove, M. and Ward, R. (2017) *Brick by brick: A review of mental health and housing*. London: Mind. Available at: <https://www.mind.org.uk/media/17947884/20171115-brick-by-brick-final-low-res-pdf-plus-links.pdf>, page 13

<sup>6</sup> The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018. Available at: <http://www.legislation.gov.uk/ukdsi/2018/9780111167359/regulation/2>



28 After heat issues, the most frequent response to this question was that a decent home needs to be secure, stable and reliable. The word 'secure' was used repeatedly, but in slightly different contexts: there were answers about security in terms of safety and lack of crime, as well as security of tenure. Safety is particularly pertinent to people with mental health problems, given they are considerably more likely to be victims of crime than the general population, and more likely to suffer additional adverse consequences as a result of crime.<sup>7</sup>

29 One way that a home can feel secure is through a longer tenancy. A handful of respondents mentioned this as part of their definition of a decent home. Alongside this, many people opted to include supportive landlords, and quick problem solving as key factors in a decent home for them.

**A safe secure place to live in peace and with a descent [sic] landlord who will action any problems swiftly and with minimal hassle and fuss... dealing with anti-social and harassment issues.**

30 A strong theme about feeling safe in your home and in your community came out, with many people pointing out specific groups of people or situations that made them feel unsafe.

**Decent homes should feel safe to live in. Whether that be safe from fire or safe from the elements, safe health wise (no mould or damp) or safe from others around who use drugs, run in gangs or use anti-social behaviour to abuse and intimidate, or just safe from stress -being able to close your front door or bedroom door if sharing, and feel in your own space without others encroaching in with things like the smell of their drug/weed smoke, noise or whatever else. All of these things should be taken very seriously [...] It should not be an "added extra" or a luxury to feel safe in your own home, rented or otherwise. Currently it is.**

31 These issues of safety, security and community also came up in our focus groups. In both Hackney and Birmingham participants explained that neighbours' drug use was a problem, and in Birmingham one person was worried about prostitution, knives and guns in their local area. This made people feel unsafe and unhappy in their local areas.

**I don't feel safe and I should feel safe.**

**The neighbours are screaming and shouting and using drugs. Nobody cares.**

**I've had problems with neighbours...I'd like to move but I'm also scared because I might get worse neighbours. So it's better the devil you know at the moment.**

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<sup>7</sup> Mind and Victim Support, *At Risk, Yet Dismissed: the criminal victimisation of people with mental health problems*, (2013), Available at: [https://www.mind.org.uk/media/187663/At-risk-yet-dismissed-report\\_FINAL\\_EMBARGOED.pdf](https://www.mind.org.uk/media/187663/At-risk-yet-dismissed-report_FINAL_EMBARGOED.pdf)

- 32 Evidently the need for good neighbours – quiet, law-abiding and respectful people living around you – is key to many people with mental health problem’s idea of a ‘decent home’. There were specific points about drug use or anti-social behaviour and how these factors have impacted people’s mental health. There were also points about how access to green spaces, local amenities and transport add up to a ‘decent home’.
- 33 A sense of community was also important for many of the people we asked, and there were suggestions about mixing communities better to avoid the creation of problem areas.

#### Other factors

- 34 The cost of social housing came up, with many people explaining that a truly decent home would be affordable. Issues with properties being generally unsuitable came up in a focus group Hertfordshire. This included a woman with two children under 5 years of age who was placed in a flat 6 flights up just after having a child by Caesarean section with no lift access, and a man placed in supported accommodation in an area where he was targeted and physically attacked. Finally, other participants mentioned factors such as environmental friendliness, and the property ‘feeling like home’ as essential to it meeting their idea of a ‘decent home.’ At the moment, these more abstract elements of a ‘decent home’ are outside the legal definition.
- 35 **Recommendation: the definition should be expanded to reflect a modern, holistic understanding of a ‘decent home’.**

**Question:** Do we need additional measures to make sure social homes are safe and decent?

- 36 It’s evident that still too many social homes are not ‘safe and decent’ – whether by the legal standards or by the standards expected by those members of the public we spoke to. As a result, there urgently need to be stronger measures to ensure all social homes are safe and decent.
- 37 **Recommendation: Local authorities must stamp out non-decent homes within their housing stock, and hold any registered providers of social housing in their areas to the same standard.**
- 38 Our beneficiaries said that regulation and robust policies would better ensure social homes are truly safe and decent – citing inspections, financial penalties, the use of an independent regulator and enshrining these standards in law.

**Invest in independent inspections of these homes, perhaps via a ‘mystery shopper’ system. Introduce a quality standard that local authorities and housing associations can work towards. Name and shame providers of homes that are not safe and decent. Set up an independent ‘Tripadvisor’ style review website for such homes.**

**Audit them regularly creating jobs for the community.**

**Really important to speak with tenants, Cllrs, Officers and partners to identify issues.**

- 39 These numerous requests for inspections and regulations from people living in social housing is indicative of how the current system is insufficient. A sufficient regulatory system should be transparent to and evident in the lives of people it is seeking to protect. It should be understandable and accessible, so that people in social housing are able to use it themselves to effect change and protect themselves. It is positive to see the comments about involving tenants and holding regular inspections, because these indicate willingness to participate.
- 40 We advise the Ministry to consider replicating the Care Quality Commission's peer inspection model – whereby professionals from other trusts and experts by experience undertake inspections. This could be replicated in the social housing arena, allowing tenant bodies to be involved in inspections of other providers to protect privacy, alongside social housing professionals. We'd be happy to discuss this further with the green paper team.
- 41 Increased local authority funding, tenant involvement (through resident groups and as individuals), and support for tenants to make complaints about housing quality would all contribute to making more social homes safe and decent.

**Give local authorities the cash and powers to build again and develop local housing plans.**

**National standards throughout the country. Resident groups have active role to play this needs investment.**

- 42 It's interesting that given a media narrative about house building numbers, people are advocating for the focus to be on repairs to current homes. One respondents mentioned the changing role and ideology of housing associations as key to improve the quality of social housing. There's certainly a sense here that a lack of staff, or high quality staff, and stretch targets is contributing to an atmosphere where the tenants aren't the first priority.

**They need to reinforce the duty of care. They need to ensure that HA's have enough really caring neighbourhood officers who work on the tenants behalf rather than trying to police us ineffectively. They need responsive and caring structures where tenants rather than stressed managers' priorities are addressed.**

- 43 There were many other suggestions about how to improve the quality of social housing, from the people with mental health problems we spoke to. These include, building new, high quality social housing, giving more power to local authorities to determine their housing standards, creating more secure tenancies – so tenants are invested in their homes, training staff, reintroducing floating support funding, breaking up housing associations, and collecting more data on social housing. A number of people we spoke to were concerned about the 'ghettoization' of social housing, and called for mixed communities to be the norm.

**Build new social housing in a way that does not create ghetto estates.**

**There needs be adequate funding to sustain housing with floating support and more importantly rapid reaction support in crisis. Staff need to have good training and advice.**

- 44 Again, these solutions are more holistic than the Decent Homes Standard as it currently is, but they show the importance of considering housing in the context of a person's wider needs; people with mental health problems don't delineate between health and housing. These submissions also show how personal the definition of a safe and decent home is: for example, floating support is critical to a safe and decent home for some. We want to see the Government introduce a further element to the definition of a Decent Home which would facilitate the inclusion of factors that an individual reasonably feels is crucial to their understanding of a safe and decent home, in order to take into account a person's mental health needs and the impact housing can have far more explicitly and directly. This additional element could be agreed with a Housing Officer and/or medical professional, to help the tenant tailor their housing to their needs.
- 45 **Recommendation: Government should think more broadly about how to create safe, decent, desirable social housing, and to embed a whole person approach in this work.**

## **Chapter 2 – Effective resolution of complaints**

## A welcome and sympathy, rather than hostility or fault finding.

- 46 As in most areas of housing, the complaints processes must be made simpler and easier to understand and navigate. The “democratic filter” is unnecessarily bureaucratic, and far more must be done to provide advice and support for residents with mental health problems when making a complaint. Many people told us that they were unsure of the processes: more must be done to ensure all social tenants understand their rights and how they can seek redress. Moreover, we recommend increasing support and advocacy around social housing processes in general, right from the application stage, to reduce the need for complaints in the first place. Finally, there needs to be an urgent review of how people with mental health problems are being treated throughout the complaints process.

### Mind recommendations

**Recommendation V:** Government must ensure the development and widespread dissemination of high quality housing information and legal rights guides for social housing tenants.

**Recommendation VI:** Government should introduce guidance requiring social housing providers to respond to all complaints within a certain time period, encouraging them to recruit enough staff to be able to do this, and standardising the complaints processes across social landlords.

**Recommendation VII:** Government should develop a bespoke advocacy, advice and complaints service for social housing tenants, with a particular focus on people with mental health problems living in social housing. This new service should be designed to meet need for specialist advice and more opportunities for face-to-face discussion.

**Recommendation XIV:** Government should co-create, in partnership with social tenants, a new, independent complaints body.

**Recommendation XIV:** Government should work with the sector, and Mind, to gather evidence on mental health stigma in the social housing sector and to develop strategies for stamping it out. Local authorities should introduce zero tolerance policies for poor treatment of people with mental health problems or displays of stigmatising attitudes, with support of Government.

**Recommendation XV:** Government should develop training programmes for local authority staff about stigma and social housing. Local authorities should also commit to ensuring all housing and front line staff receive adequate training on interacting appropriately with tenants, including people with mental health problems.

## Responses to green paper questions

### Questions:

How can we ensure that residents understand how best to escalate a complaint and seek redress? How can we ensure that residents can access the right advice and support when making a complaint? How can we best ensure that landlords' processes for dealing with complaints are fast and effective?

- 47 We asked people with mental health problems about the kind of advice and support they would like when making a complaint, and how the complaints process could be clearer and more effective. Several points were repeatedly brought up.

### Feedback and follow up

- 48 Respondents felt a simple way to ensure concerns are handled better, would be to require follow up or feedback without fail. If people consistently don't receive feedback when they make a complaint they will be dissuaded from doing so. In many cases, the issue is not that residents don't understand how best to escalate a complaint, but that the processes by which to do so aren't working. Requiring a response would also be an effective way to measure whether landlords' processes are 'fast and effective' – currently, with no requirement for feedback many complaints are left unresolved, and people are left waiting indefinitely.

**I would want a follow up complaints service as when I make a complaint I do not hear from anyone about it. Equally I do not hear anything for them to redress the errors.**

**Need to get an immediate reply -at least telling you when there will be an active response.**

**There is no point complaining. For a complaint to be dealt with it has to be made to a competent body.**

- 49 **Recommendation: Government should introduce guidance requiring social housing providers to respond to all complaints within a certain time period and encouraging them to recruit enough staff to be able to do this.**

### Independent complaints body

- 50 Respondents and participants at our focus groups also discussed the need for an independent complaints body. The role people felt this body should play varied slightly – from providing advocacy support, to complaining on an individual's behalf when they are afraid of challenging their landlord.

**Have a recognised independent body that can implement the process of complaining for you.**

- 51 Whilst currently there are mechanisms to complain about social housing via the Housing Ombudsman, or Local Government Ombudsman in the case of how social housing is allocated, these are complex to navigate and poorly understood. We want to see the creation of a new complaints body, co-designed with tenants, to ensure it is transparent and navigable. Any complaints body should embed the needs of people with mental health problems, given the large proportion of social tenants they represent. Key factors the people with mental health problems we spoke to said were important were transparency, or the provision of a named point of contact to direct complaints to.
- 52 Respondents across the board called for a clear, standardised procedure for making complaints – with every housing association or social housing provider having different complaints processes, tenants feel confused and ignored.

**Rather than using several different agencies who all seem to have their own rules and regulations, construct a simple framework that outlines the processes that must be followed by housing providers so that it remains the same all over the UK.**

- 53 We also advise the Ministry to consider replicating the third party soft referrals used by the Care Quality Commission, whereby certain third parties, like Mind refer complaints made to them about social care directly to the CQC, with the complainant's permission to help streamline the process. We'd be happy to discuss this, and peer inspections, with the green paper team.
- 54 Recommendation: Government should co-create, in partnership with social tenants, a new, independent complaints body.**

General advice and support

- 55 Two in five people with mental health problems don't understand their housing rights at the moment, and many people who took part in our focus groups or our online campaigner action felt there wasn't enough general support and information about how to solve problems in social housing.<sup>8</sup> This is likely tied to the number of different complaints processes available; it would be far easier to advise on how to make a complaint or resolve an issue if the systems were standardised across social housing.
- 56 Recommendation: Government should introduce guidance standardising the complaints processes across social landlords.**
- 57 Social landlords should produce comprehensive advice products so that tenants know how to get help before they need it. These products, whether online, or in booklet format, could be distributed at the start of tenancies and in social housing blocks in order to reach as many tenants as possible.

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<sup>8</sup> For more information on our research, see Appendix 1.

If you don't know the counsellors and support workers are there how do you access them? It's not being advertised so it's difficult to find that sort of help.

- 58 Improving these support mechanisms throughout the social housing processes should increase satisfaction and root out problems at an earlier stage.

This no longer applies to me, but perhaps it should be written into the terms of the tenancy, if it isn't already, with clear guidance on the complaints procedure. A list of contact points in case of a complaint, including those of independent advice agencies for people who for whatever reason feel uncomfortable or fearful of approaching the landlord.

- 59 **Recommendation: Government must ensure the development and widespread dissemination of high quality housing information and legal rights guides for social housing tenants.**

#### Mental health awareness

- 60 Many respondents also wanted access to a person trained in mental health issues to discuss their complaint with. This could be in the form of a dedicated phone line, online chat or face-to-face service – with the emphasis on giving people options about how they complain – but it's fundamental that anyone handling complaints understands mental health and the role it plays in a person's housing. People with mental health problems at our focus group in Stevenage called for peer led specialist call centres staffed by people with experience of disability, including mental health.

I would like it to be possible to complain to a psychiatrist or someone for those with experience in supporting those of us with mental health conditions- so they have not just an understanding of how an issue such as noise, threats or so on can affect someone who has previous issues, but how urgent it is to fix these issues not just talk about it.

I'd create a helpline, so when people are in crisis there is someone they can talk to.

Employing compassionate, intelligent, adaptable people who understand the complexities of mental health issues would help, as would designing a simplified system that prioritised those with mental issues in the same way as those with physical disabilities.

[There should be] departments that specialise in working with people with mental health issues or better assistance.



- 61 Linked to people's challenges with digital technologies was a suggestion that more interactions with housing provider staff should take place face-to-face. One group explained that they felt as social housing providers have grown in size, they have lost their understanding of local need and the ability to discuss complaints face to face has dwindled. There was a real desire from all focus group participants to see the person they were talking to, as well as a recognition that this was particularly important for people who had mental health problems.

**It'd be good if not everything was done through a computer...we're human beings we don't operate through computers, we want face to face contact. Especially people with mental health problems.**

**[There should be] a human being from the council to talk to face to face. If it meant having offices open again. Or if you could make an appointment and see someone and know they would do something about it, not just fob you off.**

- 62 A call for a compassionate human approach was heard in all of the focus groups and from a majority of campaigners. Responses to complaints and problems must be caring, positive and proactive as a rule rather than an exception. We understand not all complaints can be resolved, but we urgently need to move away from a situation where people feel they won't be listened to, or will be labelled a troublemaker if they try to complain. Many people with mental health problems that we've spoken to described a 'rigid' and 'blinkered' complaints process.

**Respectful listening and responses to our concerns whatever size they may be.**

**There needs to be a lot more compassion in the way the council treat people.**

**I would suggest ALL complaints need to be handled with the same degree of compassion, energy and force because we should be looking at prevention of any more disorders as well as preventing those who already suffer and struggle with getting worse.**

- 63 We were particularly concerned to hear from people with mental health problems about being disciplined for displaying emotions or for becoming upset when complaining or seeking advice. Whilst it's imperative that housing staff are safe at all times, we've heard from people who were treated as being difficult or violent simply for crying during a discussion about their housing – an understandably difficult subject.

**When you get upset, they immediately accuse you of being antisocial or abusive. But they are allowed to talk to us in a very rude way.**

**They say don't cry. Every time you come here you cry, you can't do this.**

64 We've also repeatedly heard from people whose complaints were dismissed as a result of their mental health.

**Not just dismiss it all as my mental health. [I want to be] treated fairly [like other] tenants.**

65 This green paper is an opportunity for social housing providers to revolutionise how they interact with tenants, beyond the complaints process. We want a zero tolerance policy for poor treatment of people with mental health problems or displays of stigmatising attitudes.

66 **Recommendations:**

- **Government should work with the sector, and Mind, to gather evidence on mental health stigma in the social housing sector and to develop strategies for stamping it out. Local authorities should introduce zero tolerance policies for poor treatment of people with mental health problems or displays of stigmatising attitudes, with support of Government.**
- **Government should develop training programmes for local authority staff about stigma and social housing. Local authorities should also commit to ensuring all housing and front line staff receive adequate training on interacting appropriately with tenants, including people with mental health problems.**

67 People with mental health problems need both practical and emotional support to navigate the complex social housing system. This is true of people applying for social housing for the first time, those who want to move to more suitable properties and those who have an issue. People also mentioned the role advocates or support workers could play to support them throughout the process, as well as to provide advice about complaining and navigating the process. This is indicative of how stressful and complicated complaining and navigating social housing can be for people with mental health problems.

**The potential to use an independent advocate provided by the landlord, or being able to use someone of my own choice, if I felt unable to cope with the process myself. There should be guidance provided, as a norm, on how to complain, and what to expect if a complaint is made.**

**Someone to help word the complaint when the [person involved can't find the right words. To help the person negotiate the process, keeping their stress levels down.**

68 Of concern too, were the insights from individuals who felt that having an advocate was essential both because of the support they give, and because their involvement is seen as a clear indicator to housing providers of the individual's level of need.

**Once you have a support worker who knows the law and is speaking for you then you're ok. But if you don't, then it's like there's nothing wrong with you because you don't have help they think you can do it yourself. But they don't know that you're desperate**

and at the point where you could commit suicide. But you need that support worker to say that for you – someone with authority.

The first time [I applied for social housing and got rejected] I didn't have any help. I didn't have any support. I was seeing a psychiatrist very occasionally, but I didn't seek out any support and I didn't get any, and the council used that against me because I didn't have anyone helping me. And you're vulnerable when you've got mental health problems particularly if no one is helping you or speaking for you. You're basically so easy to be dismissed and to get rid of.

- 69 The concerning implication of these experiences is that people with mental health problems were not believed when advocating for themselves, and that in fact, they were dismissed when they attempted to navigate the process alone – a point we will discuss in more detail in Chapter 4.
- 70 **Recommendation: Government should develop a bespoke advocacy, advice and complaints service for social housing tenants, with a particular focus on people with mental health problems living in social housing. This new service should be designed to meet need for specialist advice and more opportunities for face-to-face discussion.**

## Chapter 3 – Empowering residents and strengthening the regulator

**Social landlords should be measured on: their history of investing in improvements / repairs to their property, their success in dealing with complaints, how safe and secure their properties are, their attitude towards people with mental health issues**

- 71 Regulation is vital for ensuring standards are kept up across the social housing sector. As our submission under the questions in Chapter 1 shows, there are still many issues with social housing facing people with mental health problems.
- 72 We were concerned though, that the questions posed in this chapter were too specific for people in social tenancies and/or with mental health problems to answer. As such we asked focus group participants and campaigners what they feel social landlords should be measured on, and whether they felt a public record of performance like a league table would be a useful tool.
- 73 Overall, respondents had mixed feelings about the public comparison of social housing, with the majority concerned that they would be pointless given their powerlessness to change providers. There was also a concern that certain organisations would be able to 'fix' their scores. A large minority felt league tables might encourage social housing providers to improve standards, regardless of the method of publication and the vast majority of respondents wanted social landlords to be measured on a number of performance indicators.

### Mind recommendations

**Recommendation IX:** Government should expand proposed key performance indicators (KPIs) to include the factors that are important to people with mental health problems including: crime, safety, communication, staff training and treatment of tenants with mental health problems. A KPI to measure good neighbourhood management must consider the factors important to people with mental health problems: safety, cleanliness and community cohesion. Government must work with the sector, including Mind, to design and evaluate anti-social behaviour KPIs that do not discriminate against people with mental health problems. We would also like to see Government work with Mind to develop a mental health specific KPI and award for high performers. Social value delivered by social landlords should be measured, and best practice should be shared and celebrated.

**Recommendation X:** The Regulator of Social Housing's powers should be strengthened to encourage good performance against the KPIs, and expanded to include scrutiny of local authorities.

**Recommendation XI:** Social landlords should publish their performance against the KPIs annually, to the Regulator. This should be done cautiously, given the concerns of people with mental health problems.

**Recommendation XII:** The Regulator should be given the power to produce further Codes of Practice, and should develop a Mental Health Code of Practice.

**Recommendation XIII:** Tenants should be involved in regular reviews of social housing KPIs, and inclusion of harder to reach groups should be included in all engagement metrics and initiatives. Further, residents groups, including those with mental health problems, should be supported to regularly scrutinise the definition of a Decent Home and to encourage a holistic understanding of a good home.

## Responses to green paper questions

### Questions:

Do the proposed key performance indicators cover the right areas?

Are there any other areas that should be covered?

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?

74 We welcome the green paper's proposed key performance indicator areas (keeping properties in good repair; maintaining the safety of buildings; effective handling of complaints; respectful and helpful engagement with residents; and responsible neighbourhood management including tackling anti-social behaviour.) Focus group participants and campaigners identified several key factors on which a social landlord should be measured on. The four most frequently mentioned areas matched those of the proposed KPIs: housing quality, maintenance, complaints system/outcomes, treatment of tenants came up in the largest numbers.

**Key areas would be 1) fair rent 2) state of properties 3) promptness of repairs 4) unnecessary evictions.**

75 There were several suggestions from people with mental health problems for other areas that should be covered by KPIs. Firstly, social landlords should be measured on crime rates and building and tenant safety. Secondly, tenant satisfaction with communications should be measured – this could be included as an additional detail under the 'respectful and helpful engagement with residents' section.

76 There were also suggestions about including KPIs to measure quality of amenities, community cohesion, green spaces, value for money and affordability. Particularly importantly for mental health, there were suggestions about including KPIs to specifically measure staff training (in all areas including mental health), handling of tenants' with mental health issues, and rates of unfair evictions (which disproportionately impact people with mental health problems.)<sup>9</sup> We would be interested in working with Government to develop a suitable way of measuring the performance of social landlords in meeting the needs of tenants with mental health problems.

**Measure on a wide range of satisfaction and safety/security aspects. To include mental health.**

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<sup>9</sup> Diggle, J., Butler, H., Musgrove, M. and Ward, R. (2017) *Brick by brick: A review of mental health and housing*. London: Mind. Available at: <https://www.mind.org.uk/media/17947884/20171115-brick-by-brick-final-low-res-pdf-plus-links.pdf>, p.40

**They should be measured on maintenance of properties, dealing with tenants problems with properties promptly, assisting tenants if rent arrears start appearing , updating tenants on any changes or visits, having frontline staff who are trained in dealing with a diverse housing population and who are able to assist in handling the problem accordingly.**

77 Setting a key performance indicator is a suitable method of measuring the outcome of complaints processes: tenants should be supported to review the complaints process and this insight used to gauge efficiency and satisfaction. As mentioned in Chapter 1, as a baseline, setting social landlords a target of responding to every complaint would be a huge improvement and would also facilitate better measurement of the efficiency of the process.

78 As we will discuss further in Chapter 4 we're concerned about the incentivising the harsh treatment of people accused of anti-social behaviour. Our research has shown that anti-social behaviour rules are enforced more harshly when related to people with mental health problems: we must avoid further stigmatising those living with mental health problems or exposing them to discriminatory behaviour. That said, anti-social behaviour can also have a negative impact on victims' mental health so there is a fine balance to be found.

#### **79 Recommendations:**

- **Government should expand proposed key performance indicators (KPIs) to include the factors that are important to people with mental health problems including: crime, safety, communication, staff training and treatment of tenants with mental health problems.**
- **Government should work with Mind to develop a mental health specific KPI and award for high performers.**
- **Government must work with the sector, including Mind, to design and evaluate anti-social behaviour KPIs that do not discriminate against people with mental health problems.**

#### **Questions:**

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

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

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

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

80 Social landlords should report performance against these KPIs every year, to the Regulator. The Regulator is well-placed to prepare these KPIs but we would encourage it to do so in partnership and consultation with residents and landlords. This could be in the form of residents' associations, or specialist steering groups. We would encourage multiple methods of consultation to ensure a

representative group of tenants is involved, including those with mental health problems who may not feel comfortable participating in some types of engagement.

**We need a range of indicators to be worked out by tenants and entered into legally binding lists.**

- 81 Transparency about the performance of social landlords is critical to improving tenant satisfaction. Social landlords should have to publish their performance against these key performance indicators and social tenants should be easily able to find out how their landlord is performing. Access to this understanding is fundamental to holding landlords to account and forms the basis of a functioning complaints system. However there is concern amongst people with mental health problems about direct comparisons between social housing providers for a variety of reasons: concerns about 'fixing' the numbers, lack of agency to change providers, lack of resource to improve standards, feeling of helplessness if in poorest housing, poor data collection.

**I don't think this should be necessary, what good would it do if you knew someone in Wales was getting a better deal than you living in NW England or London?**

**League tables are not really helpful, unless the poorer performers are going to be made to improve.**

**Each situation should be assessed individually and fully as each area is different and people's needs are wide and variable**

**Possibly not. We want an atmosphere of support and cooperation rather than competition.**

- 82 Looking beyond the specifics of a league table, these concerns can be applied to all public performance measures. KPIs should be flexible enough to acknowledge differences in regional and local need, to highlight and share good practice rather than foster unhelpful competition, and they must be transparent and understandable to any individual seeking to access them. Fundamentally, KPIs should be a way to enforce standards – so any new KPIs need to be introduced hand in hand with additional regulatory powers to enforce them.

**League tables are a good idea. Landlords that don't comply to the rules should be prohibited from letting/renting.**

**I don't really like the idea of league tables because I think they can be quite crude forms of measurement and open to abuse. Perhaps they could be subject to yearly/six monthly reports by a recognised independent and locally appointed authority, who could be more flexible and aware of local conditions and issues.**

83 We need to find a middle ground between a schools style league table, and the governance and viability ratings the Regulator already publishes which are not particularly accessible to most people. KPI performance should be included in annual reports, on website home pages and in publicity materials. Performance could be tied to funding, although other organisations are better placed to comment on this, or high performing social landlords could be incentivised in other ways through public recognition. We would be interested in working with Government and social housing providers to produce a guide to good social housing for people with mental health problems that could then be used to determine the best performing social landlords.

84 **Recommendation: Social landlords should publish their performance against the KPIs annually, to the Regulator. This should be done cautiously, given the concerns of people with mental health problems.**

**Question:** 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?

85 The Regulator should have the powers to produce any documents necessary to support the landlords and residents to understand what good looks like. We're aware that for many, the link between mental health and housing is still unfamiliar, so we think there is a need for a Mental Health Code of Practice. A Mental Health Code of Practice could codify and deliver information about how to provide a reasonable level of service for a person with mental health problems, and how to determine what a home of 'appropriate quality' is for a person with mental health problems. Given mental health fits across all the existing consumer standards, a cross-cutting Code of Practice may provide useful clarity and offer social landlords a 'one stop shop' guide to supporting tenants with mental health problems. As mentioned earlier, more than one in three social tenants has a mental health problem, so such a Code of Practice would be extremely relevant.

86 **Recommendation: The Regulator should be given the power to produce further Codes of Practice, and should develop a Mental Health Code of Practice.**

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

87 We believe that the Regulator should have greater ability to scrutinise the performance of local authorities, including to levy fines for breaches of standards, and to publicise poor performance. We're deeply concerned by reports from people with mental health problems about the poor quality, unstable social housing they're forced to live in and we support measures to urgently improve standards in the sector. Whilst we understand local authorities are subject to other forms of scrutiny, for instance by elected officials, our submission in Chapter 1 evidences that this is ineffective. We know that where you live has a huge impact on your mental health so we feel it's in the interest of public health to ensure social housing, regardless of owner, is fit for purpose. Finally, we know that many people have no say



in who provides their social housing: for some people their provider has changed over the course of their tenure, and many people think of housing associations and local authorities as interchangeable. It would therefore be fairest to hold all social housing to account in the same way and by the same Regulator.

**Maybe league tables would encourage poor providers to improve. However the way that Social Housing is allocated in our area (via a website with all the local providers on, a system of prioritisation according to need and then finally a bidding process) you rarely know which housing provider you will eventually end up with as a landlord.**

- 88 **Recommendation: The Regulator of Social Housing’s powers should be expanded to include scrutiny of local authorities.**

**Questions:**

Are current resident engagement and scrutiny measures effective?

What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?

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

- 89 We believe the issue is not whether tenants know how to engage with landlords, but whether they feel comfortable, supported and welcome to do so. One focus group participant, for example, explained that their experience of joining a housing committee was unpleasant; they felt the staff were not compassionate and that their mental health was a barrier to participating.

**I was on the committee, but they’ve put me off even wanting to be on the committee. I don’t feel that social housing really know how to deal with people who have mental health problems. I don’t think they have any compassion and they don’t get it. Maybe they should go on training. Maybe they should have an actual team that deal with that area. I don’t know if they do but I’ve never encountered it. I don’t feel comfortable anymore to approach the housing office for anything. There’s an AGM soon and I’m already getting anxiety about whether I should go or not.**

- 90 Any metrics for measuring tenant engagement should also include specifically engaging with harder to reach groups, including people with mental health problems. We recommend that tenant engagement programmes should include naming a mental health champion or recruiting a tenant with mental health problems as a representative. We’d also want to see any national tenant body make sure to include harder to reach groups – we would be happy to work with a national tenant organisation or other third sector organisations to support people with mental health problems to take part.

**91 Recommendation: Tenants should be involved in regular reviews of social housing KPIs, and inclusion of harder to reach groups should be included in all engagement metrics and initiatives. Further, residents groups, including those with mental health problems, should be supported to regularly scrutinise the definition of a Decent Home and to encourage a holistic understanding of a good home.**

## Chapter 4 – Tackling stigma and celebrating thriving communities

**When someone gives me stigma for social housing I look at them and think what a fool you are - stigma about mental health is the problem not about social housing.**

- 92 We welcome the green paper's engagement with the issue of stigma around social housing. We spoke to focus group participants and campaigners about their experiences of stigma, and how they think it can be tackled. During our conversations about social housing we also gathered insight into where the industry needs to professionalise. However, stigma is a huge problem for people living with mental health problems, and we're concerned that the paper doesn't go far enough to acknowledge the additional layers of stigma experienced by some groups. As such our response to this chapter's questions starts with some insights into stigma around mental health.

### Mind recommendations

**Recommendation XIV:** Government should work with the sector, and Mind, to gather evidence on mental health stigma in the social housing sector and to develop strategies for stamping it out. Local authorities should introduce zero tolerance policies for poor treatment of people with mental health problems or displays of stigmatising attitudes, with support of Government.

**Recommendation XV:** Government should develop training programmes for local authority staff about stigma and social housing. Local authorities should also commit to ensuring all housing and front line staff receive adequate training on interacting appropriately with tenants, including people with mental health problems.

**Recommendation XVI:** Government should co-create locally tailored anti-stigma programmes with social tenants and residents' organisations.

**Recommendation XVII:** Government should produce guidance to standardise mental health policies in social housing, including collecting data around allocations, evictions and waiting lists.

**Recommendation IX:** Government should expand proposed key performance indicators (KPIs) to include the factors that are important to people with mental health problems including: crime, safety, communication, staff training and treatment of tenants with mental health problems. A KPI to measure good neighbourhood management must consider the factors important to people with mental health problems: safety, cleanliness and community cohesion. Government must work with the sector, including Mind, to design and evaluate anti-social behaviour KPIs that do not discriminate against people with mental health problems. We would also like to see Government work with Mind to develop a mental health specific KPI and award for high performers. Social value delivered by social landlords should be measured, and best practice should be shared and celebrated.

**Recommendation XV:** Government should develop training programmes for local authority staff about stigma and social housing. Local authorities should also commit to ensuring all housing and front line staff receive adequate training on interacting appropriately with tenants, including people with mental health problems.

## **Stigma around mental health**

- 93 More than four in ten of Mind’s campaigners who submitted to the green paper had experienced stigma. This varied from being refused services or assistance, being accused of faking a burglary, to being verbally assaulted. This is the same proportion as in our February 2018 survey of 1,700 people with mental health problems, when we found that four in ten people with mental health problems had experienced stigma.<sup>10</sup>

**No one listens and complaints are brushed under the carpet. It is if we don't have valid points**

- 94 The majority of campaigners who had experienced stigma said it related to their mental health or another protected characteristic, alongside housing related stigma. It’s critical that stigma about social housing is considered as part of a wider issue about stigma against the people who live in it: stigma about social housing cannot be tackled without also tackling stigma around mental health, disability, and other protected characteristics like sexual orientation.

**Stigma is multi-faceted, and cannot be seen as due to one specific issue. However, it is evident that having mental health issues can exacerbate the stigma experienced, and could be even further compounded by race, gender etc.**

- 95 Our engagement with people with mental health problems has made it clear that social housing providers are at fault in many cases of stigma. Government urgently needs to address the phenomenon of stigma against people with mental health problems in the social housing sector.
- 96 There was a strong sense at the focus groups that housing providers were not generally sympathetic to people’s mental health problems, characterised as having a lack of compassion and a lack of basic humanity.

**[Housing Association staff] will say it’s your imagination.**

**We don’t count. They treat you as if you don’t know what you’re talking about.**

- 97 These staff are at the frontline of what appears to be a broken system, so it is perhaps unsurprising that they are not popular with residents. That said, it is unacceptable that so many people with mental health problems are experiencing poor treatment, and, in some cases discrimination. Focus group participants described how their mental health problems had been used to discount their complaints and some people felt their diagnosis meant they were less likely to be taken seriously by housing professionals.

**Yes. All the anti-social behaviour I am experiencing has been put down to my mental health. Which is not true.**

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<sup>10</sup> See Introduction and Appendix 1 for more information.

- 98 Focus group participants discussed how housing staff appeared more suspicious of mental health problems compared to physical problems: two people said they felt “visible” physical health problems were given more heed than “invisible” mental health problems.

**It’s an invisible illness...there’s an inclination not to believe, they prioritise issues they can see.**

**Training for the people who make the decisions is going to be key, they need to know what it is to be mentally ill. They know about the physical things, but mental illness is generally quite hidden.**

**No but they don’t rate it or understand the devastation or need for help. People with visible illnesses always are given help but not people with invisible illnesses or ones with stigma attached to them. Housing officers rely on personal opinions when it comes to mental health not educated learned ones from facts. There should be courses in mental health and its importance given at the start of their employment and throughout in training to reinforce it.**

- 99 This is deeply concerning given the high proportion of people in social tenancies experiencing a mental health problem: the implication is that one in three social tenants is being routinely discriminated against. In some case the stigma has been so severe that people have told us they’ve been afraid to disclose their mental health status to housing staff. One person explained how they censored themselves when speaking to housing provider staff because they did not want to be treated any differently to anyone else. People in social housing should be able to talk opening about their mental health with the staff ostensibly there to support them.

**You’re afraid to say you’ve [got mental health issues] because you think if you say it to them, they won’t deal with your problem.**

**Sometimes I feel ashamed. That’s what prevents me from speaking. It’s like something you’ve done wrong, like a criminal because you’re treated like that. Like a second-class citizen. If you have mental health problems you’re treated as sub human.**

- 100 Most worryingly, stigmatising beliefs held by social housing staff seems to impact on the properties people with mental health problems are being offered. Mind has heard numerous times of people allocated the poorest quality homes, or told because their health condition isn’t physical, they’re not eligible for certain types of social home.

**I feel I have been placed in one bad flat after another due to my mental health. I think they have particular properties that they place is in as kind of second class citizens**

**Yes I was told by the council that because I am not physically disabled they won't class me for disabled housing**

**Yes. I was in tears after speaking to somebody who effectively shouted me down. I'm usually fairly assertive and articulate but on that day, I just had to accept what she said. I am now in something like band 5, which I believe is too low considering the length of time I've been dealing with depression and anxiety and the impact these conditions continue to have on my life.**

- 101 We welcome the green paper's engagement with the issue of social housing allocation in Chapter 5. We've heard anecdotally, as some of the quotes in this submission highlight, that people with mental health problems are being placed further down allocations bandings than those with physical health problems. In addition to stigmatising attitudes from housing staff, there are concerning trends emerging, with local authorities choosing to prioritise certain groups based on factors like being in work. We're concerned this is adding up to an allocations system that is discriminating against people with mental health problems.
- 102 There's clear need to improve the experience for people with mental health problems, but without adequate data collection about social housing allocations, and particularly the journeys of tenants with mental health problems, it's hard to see a crystal clear picture of why social housing is failing this group. This lack of data means it's difficult to pin point whether the issue with housing allocations is originating at the national, local or front-line level, and it's impossible to regulate social housing across the country. That's why we were pleased to see that MHCLG intends to undertake research into allocations policies. We hope to work further with the Ministry to investigate why people with mental health problems are being disadvantaged or discriminated against by current allocations systems, and will be sharing our findings in this area with the team directly, given there are no consultation questions on the issue.
- 103 As we've shown, the problem of stigma goes beyond allocations, however. If the Government is truly committed to tackling stigma around social housing, and to doing more to give mental and physical health parity of esteem, then we need to see a more comprehensive approach to ending the mental health stigma endemic in the social housing sector. We look forward to working with the Ministry to gather evidence on this issue and develop strategies to make this a reality.

## **Responses to green paper questions**

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

- 104 Our discussions with people with mental health problems showed that there multiple kinds of stigma attached to social housing, as the tenant engagement events run by the Ministry of Housing,

Communities and Local Government also found. We're pleased to see the green paper engage with tackling stigma, but we believe it will take far more than a best neighbourhood competition.

- 105 There is stigma focused on the housing itself, including its quality, expense and how pleasant it is to live there. Improving the quality of social housing, as per our submission under Chapter 1, and improving complaints processes (Chapter 3) so that issues can quickly be dealt with, are likely to have a positive impact on this kind of stigma. We support the call by organisations like Crisis that increasing the number of social homes of various types will go some way to reducing stigma, as social housing becomes more common. Suggestions from those we spoke to also included focusing on creating varied communities and breaking up 'ghettos' to reduce people's concerns about crime.

**I don't feel ashamed of where I live - the name didn't give it away to potential employers and my friends all knew although some refused to come round as they were scared. I just need to feel safe with the other people who live there.**

**By having more and more diverse communities in them.**

- 106 There is also stigma focused on the people who live in social housing. This can be in the form of dismissing their issues, considering them to be of a certain class or wealth, and assuming higher rates of crime and anti-social behaviour.

**To remove the belief that it is all the scum who live in social housing, to make social housing more inclusive with the communities. To stop the ghetto forming of areas with addicts, dealers. Anti-social dropouts, ex-offenders and the [supposed] dregs of society.**

**I feel as though some people look down their nose at me for not having a job. I remember the abusive neighbour upstairs calling me and then-acquaintances "parasites" and "scum". I have also had horrible remarks aimed at me by strangers on social media, implying that I was lazy and just faking my depression and anxiety.**

- 107 People with mental health problems said the best ways to tackle stigma is through education and training – both from a young age to stamp out stigma in the next generation, and education and training amongst people working with those in social housing or experiencing mental health problems.

- 108 There were some who felt policies had thus far been ineffective, whereas other felt more policies and legislation are required to tackle stigma. 'Zero tolerance' policies for both staff and tenants were called for by people with mental health problems. A clearer cut policy like this would be easier to enforce, and would offer tenants more protections. One campaigner said that putting more effort into recruiting people with mental health problems into local authority roles would reduce stigma. Again, making efforts to ensure the system is transparent, and the complaints process is robust, will help people to call out stigma and feel protected.

## Public-information and education programmes by housing providers.

I think there should be clear policies and training on social stigma and how to treat people with mental health problems for social housing staff. Also there should be a zero tolerance policy of all forms of discrimination governing both tenants and social housing staff.

Policies and legislation already exist to tackle such issues, as they are largely ineffective. Education, training, effective methods of dealing with complaints, and support for their implementation would all help. Policies should be set up in consultation with people with mental health issues, not just their representatives.

- 109 It's evident that social housing tenants and people with mental health problems are concerned about stigma, but that they have varying opinions about how to tackle it.
- 110 Recommendation: Government should work with residents and residents' groups to develop and trial anti-stigma programmes that are tailored to communities.**

**Question:** What is needed to further encourage the professionalisation of housing management to ensure all staff deliver a good quality of service?

- 111 As discussed at the beginning of this chapter, there is a widespread problem with stigma against people with mental health problems in the social housing sector. Part of this problem is the lack of robust policies and training for social housing staff about mental health, which has led to a postcode lottery and reliance on the personal knowledge and attitudes of staff.

### Training

- 112 Training is a solution to many of the issues in social housing, and an excellent suite of training given to all local authority staff would contribute to professionalization of housing management. People with mental health problems suggested co-producing training with tenants and people with mental health problems, in order to make it as useful as possible.

I think [housing staff] need to be trained...if you go along with a broken leg it's easy, but mental health, they don't know anything about it.

Training for the people who make the decisions is going to be key, they need to know what it is to be mentally ill. They know about the physical things, but mental illness is generally quite hidden.



113 We asked local authorities across England about the training they currently provide to housing, front line and all local authority staff. We had responses from over 60 local authorities, of which 17 said all staff at their local authority have mental health training. We urgently need to see an improvement in the mental health, and housing and mental health specific training undertaken by local authority staff. As a start, all local authority staff should receive basic mental health training. Some authorities listed multiple training sessions their staff had undertaken which is very promising, and offers the Ministry the chance to assess the impact of training on tenant and staff wellbeing. Mind is confident that additional training will reduce stigma, discrimination and improve tenant and housing staff relationships. We look forward to working with the Ministry of Housing to achieve this.

**No but they don't rate it or understand the devastation or need for help. People with visible illnesses always are given help but not people with invisible illnesses or ones with stigma attached to them. Housing officers rely on personal opinions when it comes to mental health not educated learned ones from facts. There should be courses in mental health and its importance given at the start of their employment and throughout in training to reinforce it.**

#### **114 Recommendations:**

- **Housing-specific mental health training for local authorities needs to be developed; we would be interested in working with Government on developing and piloting this, as well as working with social housing providers and local authorities.**
- **Enhanced staff training should be introduced as a separate key performance indicator in order to ensure all local authorities are undertaking it.**
- **Introduce blanket policies about mental health training to avoid erroneous decisions about who should be trained - we were concerned by local authority comments about training being provided to 'relevant' staff, given the evident lack of understanding about the link between housing and mental health.**
- **Government should commit to ensuring equal access to high quality housing and mental health training across the country – this is in response to comments from some local authorities about a scarcity of training in their regions**
- **Local authorities should commit to providing all staff with high quality mental health training.**

#### Policies around mental health

115 A simple way to 'professionalise' housing management would be to standardise mental health policies. When speaking to people with mental health problems, and local authorities, it became apparent there are huge variations between approaches to mental health.

116 The obvious area where policies should be standardised is allocations, but there also could be a more consistent approach to recording information about people with mental health problems on waiting lists and being evicted, as a way to ensure people are being treated the same across the country. When it

comes to waiting lists, as an example, we saw that in many areas mental health is only taken into account if the applicant brings it up: this leaves the onus on the applicant to a) understand their mental health is relevant and might be useful and b) to feel confident enough to disclose this, potentially unprompted.

**There should be some system of checking how staff are dealing with people with known mental health difficulties to monitor they are doing what they should be and have been trained to do. Human rights are breached all the time and living with regular abuse is in itself harmful to health. It could be argued in court that your health was worsened because the housing officer didn't act when they should have.**

- 117 We encourage Government to produce new mental health guidance to encourage all local authorities to ask applicants about how their mental health is being impacted by their housing, in terms that are accessible to all – not just people who have a diagnosis or experience talking about their mental health. This guidance should make it clear to local authorities that all mental health is of relevance to housing need – they should be getting a holistic understanding of applicants' needs, and recording mental health information in order to make judgements about worsening or improving situations too.
- 118 This mandatory questioning about mental health would also ensure we know how many people with mental health problems are being evicted, and for what reason. This will help us to investigate whether people with mental health problems are being disproportionately discriminated against.
- 119 This is just one example of an approach to mental health, by housing management bodies, which could be professionalised and standardised. Having consistent approaches across the country will also make the system more transparent and help people to make complaints when they have been mistreated.
- 120 Recommendation: Government should produce guidance to standardise mental health policies in social housing, including collecting data around allocations, evictions and waiting lists.**

**Question:** What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?

- 121 We invite the Ministry to consider the elements people with mental health problems consider essential to their understanding of a 'decent home' when designing a KPI of good neighbourhood management. People with mental health problems said facilitating a safe neighbourhood, ensuring a high level of general cleanliness, and a feeling of community cohesion were key to a 'good neighbourhood'. Tenants could rate landlords on these areas as part of the measure of the performance against the KPI. Good neighbourhood management should be seen as critical to day to day life in social housing. In this light, the Government's view that events like street parties or festivals as indicative of good neighbourhood management seem out of step with what people told us would be their focus: reducing crime, safety of the local area, cleanliness and residential cohesion.

**122 Recommendation: A KPI to measure good neighbourhood management must consider the factors important to people with mental health problems: safety, cleanliness and community cohesion.**

**Question:** 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?

123 We know how important good social housing can be to a person's wellbeing and mental health. Many social housing providers are going above and beyond and delivering excellent services. When we surveyed local authorities we asked about the extra services they offer. Examples included membership of the MEAM Coalition (Making Every Adult Matter, of which Mind is a founding member), a mental health re-ablement team, floating support, a hoarding panel, community hubs which combine information, advice and referrals. These services, often supporting people in general needs housing, are what makes social housing a life line for those who need it.

124 We believe social value should absolutely be measured, and that social landlords should report on how they deliver it because it is a fundamental characteristic of social housing. In particular we'd like to see social landlords sharing examples of best practice more frequently, to inspire each other and show what can be done with limited resources and capacity. We'd welcome a measure of the positive impact extra services can have on tenants' mental health.

**125 Recommendation: Social value delivered by social landlords should be measured, and best practice should be shared and celebrated.**

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

126 As we discussed in Chapter 1, we are concerned that any new KPI around anti-social behaviour may incentivise discrimination or harsh treatment of people with mental health problems. It's imperative that Government engages with the sector to draw up the details of such a performance indicator. One, positive, person-centred way of thinking about anti-social behaviour that Government could consider is the idea that local authorities have a duty of care to tenants to ensure they don't become unwell enough to cause anti-social behaviour. We look forward to working with the Ministry to develop this KPI.

**127 Recommendation: Government must work with the sector, including Mind, to design and evaluate anti-social behaviour KPIs that do not discriminate against people with mental health problems.**

## Conclusion

**[Home is] the most important thing. So that whatever else may be difficult in life, knowing that I have a safe and secure home makes keeping good mental health far easier...**

- 128 We are pleased to have had the opportunity to respond to 'A new deal for social housing.' This green paper presents a real opportunity to make our social housing system fit for purpose: a system that supports people with mental health problems across the board; a system that helps people to get into and retain homes that will help them stay safe and well; a system we all can be proud of.
- 129 It's critical to remember that one in three people living in social housing has a mental health problem.<sup>11</sup> This isn't a niche issue: Government should be putting the experiences of those with mental health problems at the heart of their plans to reform social housing. We hope our submission has gone some way to supporting this – and we look forward to working with Government in the future to ensure our social housing system is working for people with mental health problems.

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<sup>11</sup> Money and Mental Health Policy Institute, *Where the heart is: social housing, rent arrears and mental health* (April 2018) available here: <https://www.moneyandmentalhealth.org/wp-content/uploads/2018/04/Where-the-heart-is-social-housing-rent-arrears-and-mental-health.pdf>

## Appendix I

### Context: housing and mental health

Where you live can have a huge impact on your mental health – everyone needs safe, stable and suitable housing to stay well. Our 2017 report [Brick by brick](#) shows the devastating impact the housing crisis is having on people with mental health problems in the UK. High quality, stable housing is key to maintaining good mental health and is important for recovery if someone has developed a mental health problem. And yet, people with mental health problems are much more likely to live in poor quality accommodation.

In all, one in four tenants with mental health problems is in serious rent arrears and is at risk of losing their home. People with a mental health condition are four times more likely to report that poor housing has made their health worse. Unsurprisingly, GPs spontaneously identify housing issues as a common contributing factor to their patients' poor mental health.

In February 2018 we surveyed 1,780 people with mental health problems about their housing<sup>12</sup>. The experiences of this group of Mind's campaigners, members, and members of the public reinforced the findings of Brick by brick:

- Four in five (79 per cent) people told us that their housing had negatively impacted their mental health.

When asked if housing situations had affected their mental health, four in five people selected that their current or previous situations had either made an existing mental health problem worse or even caused them to have a mental health problem. This is an



alarmingly high figure and provides clear evidence that housing and mental health are intrinsically linked and mental health must be factored into housing policy decisions.

- More than two in three (69 per cent) people reported experiencing at least one issue with the quality of their housing such as damp, mould, threat of eviction, overcrowding and unstable tenancies.

Two-thirds of people reported experiencing at least one housing quality issue; most people had experienced a money issue in their previous housing, and 45 per cent of people said they had

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<sup>12</sup> Note on survey respondents: Although the survey had a significant sample size, there were issues with representation. There was an overrepresentation of respondents who identified as female (68 per cent of the sample) and an underrepresentation of people from Asian or Asian British backgrounds (1.12% rather than the England and Wales Census figure of 7.5%) and Black and Black British backgrounds (1.24% rather than 3.3%). More respondents were living in the southern half of England, but there was a good representation of all geographies.

experienced stigma or discrimination in their current housing. These findings highlight a variety of issues that people with mental health problems are facing in their housing. Most people have experienced an issue with the quality of their housing, suggesting that mental health is not being considered in the physical build of housing. The high prevalence of money issues demonstrate that there is not enough financial support for people with mental health problems and supports wider evidence that housing costs are unaffordable for large portions of the population.

- Two in five (43 per cent) said they had experienced difficulty understanding their rights regarding housing.

When asked about advice and support issues in housing, 43 per cent of people had difficulty understanding their rights. This is a substantial gap in knowledge to be addressed, so that people are able to understand and stand up for their rights.

### Social housing and mental health

There are issues across all housing sectors, but *Brick by brick* also highlighted those endemic in social housing. Social housing should be a viable and reliable option for people with mental health problems who could benefit from the relatively settled tenure and the option for increased support that social housing can provide. Instead we know that there are many issues that prevent social housing from being the haven that it should be. For example, the report showed:

- The process of seeking housing support from a local authority can be an incredibly stressful experience – in some cases causing or exacerbating mental health problems.
- Stress caused by housing insecurity or substandard accommodation can exacerbate people's vulnerabilities, worsening their condition or increasing the likelihood of relapse and/or the need for inpatient admission
- Stigma amongst housing association staff can lead to people with mental health problems being allocated the worst housing stock or not being allocated the housing they need to stay well.
- People with mental health problems have anti-social behaviour rules enforced far more severely than those without (so are lower down priority lists or considered unsuitable tenants.) There are double layers of stigma for BAME and LGBTQ people with mental health problems.

According to Money and Mental Health Policy Institute's *Where the heart is*, more than a third of people who live in social housing have a mental health problem, and social housing is the tenure which houses the largest number of people with mental health problems.<sup>13</sup> This is not surprising as we know people with mental health problems are more likely to have lower incomes, less likely to own their own homes (only 18% do), and more likely have additional support needs than the general public.

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<sup>13</sup> Money and Mental Health Policy Institute, *Where the heart is: social housing, rent arrears and mental health* (April 2018) available here: <https://www.moneyandmentalhealth.org/wp-content/uploads/2018/04/Where-the-heart-is-social-housing-rent-arrears-and-mental-health.pdf>

We also drilled down into the results of our February 2018 survey and looked at respondents' experiences of social housing. When answering just about their current housing (as opposed to what they had ever experienced, as above), 43 per cent of people currently living in social housing said it had made their mental health worse. This is a huge number of people finding that their current situation is having a negative impact on their mental health.

They were experiencing a range issues with their home: 28 per cent were in rent arrears, 27 per cent were having trouble paying for housing, and 27 per cent had problems with their Housing Benefit (or Universal Credit). This is particularly concerning given that 190 councils disqualify households from their waiting lists if they're in rent arrears (compared to 136 who don't, of those local authorities who have submitted this data to MHCLG), and that 4,900 of 5,800 local authority evictions in 2016/7 were the result of rent arrears.

48 per cent of people with mental health problems had experienced stigma in their current social housing, whether this was from neighbours, housing professionals, landlords, family or friends. An even higher proportion - 62 per cent - of people with mental health problems told us they'd experienced advice and support issues in their current housing. The main problem was difficulties understanding their housing rights, as well as difficulties getting advice about how housing can impact mental health, difficulties getting advice about how to navigate the housing system, and difficulties getting legal help if needed. This paints a concerning picture which shows the social housing system is routinely failing people with mental health problems.

## Appendix 2: Methodology

To do this we commissioned researchers Ellie Harries and Lindsay Hodgson to design and carry out three focus groups with people who use local Minds services, to discuss their experience of getting and staying in social housing. These focus groups occurred in August 2018, in Birmingham and in Hackney. We then carried out an additional two focus groups, one in Salford and one in Stevenage. Harries and Hodgson wrote up their focus groups, and their findings have been included in this response. The findings of the second set of focus groups have also been included. In total this response includes the voices of 31 people with lived experience of mental health problems who took part in focus groups.

We also asked campaigners to participate in this response. We re-framed the most relevant questions in the green paper in a more user-friendly way: this was to help people who may never have responded to this kind of consultation or thought about their experiences in a way that would directly relate to the questions posed by the green paper, to share their experiences of social housing. We shared this guide to responding to the consultation with the MHCLG Green Paper team and with local Minds who may have used it to respond themselves. It is attached in Appendix 3. Over 85 campaigners responded: their responses have also been submitted to the Green Paper team, but we've analysed them and highlighted key trends in our response.

## Appendix 3:

### Social housing green paper – Consultation guide

Over the summer the Government published their plans for social housing. Alongside this, they're keen to get feedback from as many people as possible, but the consultation process can be quite overwhelming.

That's why we've produced this guide – to help people with mental health problems to respond to the Government's consultation about social housing. Our guide breaks down the questions into sections so you can choose to answer as many or as few questions as you like – we've selected the most topics that have come up most frequently when we've been talking to people with mental health problems about social housing. In each section there's an explanation about the background of the consultation questions and suggested prompts for you to think about when you're writing your response.

This guide can be used by individuals, or also by Minds or other mental health organisations, to help service users or groups of service users to submit their responses. At the end of this guide is a summary of the key questions which could be used in a focus group. The original questions under each section are also at the end of the guide, so that you can see the exact wording the Government used.

There's an online form for consultation responses, but if you're using this guide it might be easier to send your answers directly to [socialhousinggreenpaper@communities.gsi.gov.uk](mailto:socialhousinggreenpaper@communities.gsi.gov.uk). If you email your response, don't forget to include information about yourself, like your name, contact details and information about your age, gender, and whether you live in social housing.

Section	Explanation of section, and questions to answer
Quality	<p>The Government is aware that there are concerns about safety in social housing following the tragedy at Grenfell. They ask several questions about the current definition of a 'decent home' and whether it is broad enough. They also want to know how these standards can be enforced.</p> <p>We know that poor quality homes – whether they're damp, cold or mouldy – can negatively impact people's mental health. And we think more needs to be done to ensure all social housing is not just 'decent', but of a high quality. We're also aware that people are more familiar with the physical health impacts of poor quality housing, and less familiar with what a decent home is for someone living with mental health problems.</p> <p>To answer this section, think about these questions:</p> <ul style="list-style-type: none"><li>- What do you think of as a 'safe and decent' home to live in? What are the basic things you expect from a 'decent' home, and what are the added extras?</li><li>- What is a 'safe and decent' home for people living with mental health problems in general?</li><li>- How can the Government make sure homes from local authorities and housing associations really are 'safe and decent'?</li><li>- Should safety standards be the same across social and private housing?</li><li>- Why is the quality of your home important to you and your mental health?</li></ul>



<p>When things go wrong</p>	<p>We've heard many times about complaints about social housing falling on deaf ears, about people too afraid to make a fuss, and about people who simply have no idea where to start when something goes wrong. The Government would like to know what more needs to be done to improve the complaints processes for social housing tenants.</p> <ul style="list-style-type: none"> <li>- What kind of advice and support would you want when making a complaint? How could the process for complaining about your social housing be clearer? Is there anything that specifically needs to be included in advice when it comes to people with mental health problems?</li> <li>- Have you had to make a complaint in the past? How could that experience have been improved? How did this experience impact your mental health?</li> </ul>
<p>Measuring social housing</p>	<p>You might have heard that the Government's thinking about introducing league tables which rank the best and worst social housing providers. This could help people to make more informed decisions about where they live, and help people understand the standards they should expect from their landlord.</p> <ul style="list-style-type: none"> <li>- What are the key areas you think social landlords should be measured on? Are there any particular things they can do, and should be measured on, to support their tenants' mental health?</li> </ul> <p>Prompt: The Government's got a shortlist of 5 criteria to judge social landlords on.</p> <ol style="list-style-type: none"> <li>1. Keeping properties in good repair;</li> <li>2. Maintaining the safety of buildings;</li> <li>3. Effective handling of complaints;</li> <li>4. Respectful and helpful engagement with residents; and,</li> <li>5. Responsible neighbourhood management, including tackling anti-social behaviour.</li> </ol> <ul style="list-style-type: none"> <li>- Do these cover your top 5 issues? Is there anything missing?</li> <li>- If these league tables, or information about the performance of social landlords were to be published, how would you use them?</li> <li>- What's the best way of getting the league tables out there so that people can actually use them?</li> <li>- How can the Government encourage social landlords to do better? And how can they punish social housing providers who are failing their tenants?</li> </ul>
<p>Engaging with residents</p>	<p>There has also been lots of discussion about how social landlords engage with their tenants, and how this can be improved. Sometimes, getting involved in this kind of thing can seem too much if you're struggling with your mental health, but for others it can be a way to feel more involved in the community, and a way to use and learn new skills. The questions below should be useful prompts to help you think about engagement with your landlords and what's important to you and your mental health.</p> <ul style="list-style-type: none"> <li>- At the moment, how do you engage with your social landlord? In what ways are you able to influence decisions about where you live at the moment?</li> </ul>

	<ul style="list-style-type: none"> <li>- How would you like to be able to engage with your landlord? Are there any ways residents could be encouraged to get involved with decisions about where they live?</li> <li>- What would you like to be involved in (i.e. services like cleaning, contractors, future planning and regeneration, social activities, anti-social behaviour issues etc.)?</li> <li>- What are your thoughts about organising representation of social tenants on a national level? How could a body like this get to grips with the specific issues facing people with mental health problems?</li> <li>- What's your experience of Tenant Management Organisations?</li> </ul>
Regulating social housing	<p>Public services, like the NHS and schools are regulated by organisations like Ofsted to ensure they're meeting required standards and to tackle any poor performance. The same goes for social housing – the regulator is called the Regulator of Social Housing (unsurprisingly!)</p> <p>Its objectives are:</p> <ol style="list-style-type: none"> <li>1. to support the provision of social housing that is well-managed and of appropriate quality;</li> <li>2. to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection;</li> <li>3. to ensure that tenants of social housing have the opportunity to be involved in its management and to hold their landlords to account; and,</li> <li>4. to encourage registered providers of social housing to contribute to the environmental, social and economic well-being of the areas in which the housing is situated.</li> </ol> <ul style="list-style-type: none"> <li>- Do you think these objectives cover everything the regulator should be looking for when it checks how social housing providers are performing?</li> <li>- Do you think there's anything else the Regulator should be aiming to do, or anything it should do to make sure social housing works better for people with mental health problems?</li> </ul> <p><u>Local authorities</u></p> <p>Social housing can be provided by housing association, local authorities and other kinds of organisations. At the moment the Regulator doesn't cover local authority landlords in all situations. The Government is considering the positives and negatives of expanding its powers.</p> <ul style="list-style-type: none"> <li>- Have you lived in local authority social housing?</li> <li>- Do you think they should be regulated in the same way as other kinds of social housing?</li> </ul> <p><u>Stepping in</u></p> <p>At the moment the Regulator of Social housing can only step in when there is or might be a 'serious detriment' to existing or potential tenants. Typically this is thought to mean there's the possibility of 'serious actual harm or serious potential harm to tenants.' We think this is too late a stage for the Regulator to step in, and that it'd make more sense to be proactive and act before anyone is at risk of harm.</p> <ul style="list-style-type: none"> <li>- Do you agree with us?</li> <li>- When do you think the Regulator should be able to step in?</li> <li>- Do you have any experience of harm or coming close to harm that could have been prevented by a more proactive response from the a regulating body?</li> <li>- How did this experience impact your mental health?</li> <li>- Or have you had an issue which was solved quickly, and so would have been drawn out if the Regulator had got involved?</li> </ul>

Stigma	<p>The Government ran a set of events with social tenants earlier in 2018, and lots of the people who went along spoke to the officials about the stigma around living in social housing – this idea that you’re treated differently because of where you live. We also know lots of people with mental health problems experience stigma because of their mental health, so we’re concerned about the ‘double stigma’ that could be going on. Plus, we’ve heard again and again about the stigmatising attitudes held by housing staff about people with mental health problems. It’s a big issue.</p> <ul style="list-style-type: none"> <li>- How do you think stigma about social housing could be tackled?</li> <li>- Have you experienced stigma due to your mental health?</li> <li>- How can we handle ‘double stigma’ better?</li> </ul>
Professional – isation	<p>You’ll be aware that here at Mind we’re worried that the social housing system isn’t working for people with mental health problems right now. One example of this is the stigma and discrimination people with mental health problems are facing from the housing staff meant to be there to help them. There are lots of reasons this might be happening, which we’re looking into. The Government’s green paper doesn’t go into detail on this issue but it does ask how the housing sector can be ‘professionalised’ and how the added extras good landlords offer should be measured and celebrated.</p> <ul style="list-style-type: none"> <li>- How do you think the housing sector could be more professional?</li> <li>- Thinking about housing staff you’ve come across, are there any particularly bad behaviours, attitudes or actions that should be tackled?</li> <li>- Are there any particularly good behaviours, attitudes or actions you’ve seen that should be celebrated and encouraged?</li> <li>- What kinds of training do you think housing staff should have to be more supportive to people with mental health problems?</li> <li>- Have you lived somewhere where the social landlord has gone above and beyond?</li> <li>- How have they done this?</li> <li>- Do you think this activity should be included when determining how well social landlords are performing?</li> </ul>
ASB	<p>The Government is keen to find out how social landlords tackle anti-social behaviour, and how they can measure their efforts. We know that people with mental health problems are treated more harshly than their counterparts when it comes to anti-social behaviour, and that there’s stigma around certain behaviours that might be related to mental health. There’s a careful balance to draw here and it is important for us to find out what you think.</p> <ul style="list-style-type: none"> <li>- How do you think the Government can find out more about tackling anti-social behaviour, and reward organisations doing good work, but not add to the stigma being faced by people with mental health problems?</li> <li>- Have you experienced anti-social behaviour? Why did this come about and what would have improved this situation?</li> <li>- Have you been told (or acknowledge yourself) that you’ve acted in an anti-social way? Why did this come about and what would have improved this situation?</li> </ul>

## Summary of key questions for focus groups:

Area	Questions
Quality of social housing	<ul style="list-style-type: none"> <li>- What do you think of as a 'safe and decent' home to live in? What are the basic things you expect from a 'decent' home, and what are the added extras?</li> <li>- What is a 'safe and decent' home for people living with mental health problems in general?</li> </ul>
Making a complaint	<ul style="list-style-type: none"> <li>- What kind of advice and support would you want when making a complaint? How could the process for complaining about your social housing be clearer?</li> <li>- Is there anything that specifically needs to be included in advice when it comes to people with mental health problems?</li> </ul>
Measuring and regulating	<ul style="list-style-type: none"> <li>- What are the key areas you think social landlords should be measured on? Are there any particular things they can do, and should be measured on, to support their tenants' mental health?</li> <li>- If these league tables, or information about the performance of social landlords were to be published, how would you use them?</li> <li>- Have you lived in local authority social housing? Do you think they should be regulated in the same way as other kinds of social housing?</li> </ul>
Stigma	<ul style="list-style-type: none"> <li>- How do you think stigma about social housing could be tackled?</li> <li>- Have you experienced stigma due to your mental health in social housing?</li> <li>- How can we handle 'double stigma' better?</li> </ul>
Professionalisation	<ul style="list-style-type: none"> <li>- Thinking about housing staff you've come across, are there any particularly bad behaviours, attitudes or actions that should be tackled?</li> <li>- Are there any particularly good behaviours, attitudes or actions you've seen that should be celebrated and encouraged?</li> <li>- What kinds of training do you think housing staff should have to be more supportive to people with mental health problems?</li> </ul>
Anti-social behaviour	<ul style="list-style-type: none"> <li>- How do you think the Government can find out more about tackling anti-social behaviour, and reward organisations doing good work, but not add to the stigma being faced by people with mental health problems?</li> <li>- Have you experienced anti-social behaviour? Why did this come about and what would have improved this situation?</li> <li>- Have you been told (or acknowledge yourself) that you've acted in an anti-social way? Why did this come about and what would have improved this situation?</li> </ul>

Original questions from the consultation under each of our categories:

Section	Original questions
Quality	Should new safety measures in the private rented sector also apply to social housing?
	Are there any changes to what constitutes a decent home that we should consider?
	Do we need additional measures to make sure social homes are safe and decent?
When things go wrong	Are there ways of strengthening the mediation opportunities available for landlords and residents to resolve disputes locally?
	How can we ensure that residents understand how best to escalate a complaint and seek redress?
	How can we ensure that residents can access the right advice and support when making a complaint?
Measuring social housing	<p>We consider that key performance indicators should be focused on issues of key importance to residents, covering those identified through our engagement, such as:</p> <ul style="list-style-type: none"> <li>- Keeping properties in good repair;</li> <li>- Maintaining the safety of buildings;</li> <li>- Effective handling of complaints;</li> <li>- Respectful and helpful engagement with residents; and,</li> <li>- Responsible neighbourhood management, including tackling anti-social behaviour.</li> </ul>
	Do the proposed key performance indicators cover the right areas?
	Are there any other areas that should be covered?
	What would be the best approach to publishing key performance indicators that would allow residents to make the most effective comparison of performance?
	What other ways could we incentivise best practice and deter the worst, including for those providers that do not use Government funding to build?
Engaging with residents	Are current resident engagement and scrutiny measures effective?
	What more can be done to make residents aware of existing ways to engage with landlords and influence how services are delivered?
	Is there a need for a stronger representation for residents at a national level? How should this best be achieved?
	Are Tenant Management Organisations delivering positive outcomes for residents and landlords?
	Are there any other innovative ways of giving social housing residents greater choice and control over the services they receive from landlords?
	How can we encourage social housing residents to be involved in the planning and design of new developments?

Regulating social housing	<p>Parliament has set the Regulator of Social Housing a consumer objective, which is:</p> <ul style="list-style-type: none"> <li>• to support the provision of social housing that is well-managed and of appropriate quality;</li> <li>• to ensure that actual or potential tenants of social housing have an appropriate degree of choice and protection;</li> <li>• to ensure that tenants of social housing have the opportunity to be involved in its management and to hold their landlords to account; and,</li> <li>• to encourage registered providers of social housing to contribute to the environmental, social and economic well-being of the areas in which the housing is situated.</li> </ul> <p>Does the Regulator have the right objective on consumer regulation?</p>
	<p>The Regulator has published four outcome-based consumer standards to deliver the consumer regulation objective. These are:</p> <ol style="list-style-type: none"> <li>1. The Tenant Involvement and Empowerment Standard (July 2017) which includes a requirement for landlords to provide choices and effective communication of information for residents on the delivery of all standards, and to have a clear, simple and accessible complaints procedure.</li> <li>2. The Home Standard (April 2012) which requires homes to be safe, decent and kept in a good state of repair.</li> <li>3. The Tenancy Standard (April 2012) which requires registered providers to let their home in a fair, transparent and efficient way, and enable tenants to gain access to opportunities to exchange their tenancy.</li> <li>4. The Neighbourhood and Community Standard (April 2012) which requires registered providers to keep the neighbourhood and communal areas associated with the homes that they own clean and safe; help promote social, environmental and economic well-being in areas where they own homes; and work in partnership with others to tackle anti-social behaviour in neighbourhoods where they own homes.</li> </ol> <p>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?</p>
	<p>Is “serious detriment” the appropriate threshold for intervention by the Regulator for a breach of consumer standards? If no, what would be an appropriate threshold for intervention?</p>
	<p>Should the Regulator have greater ability to scrutinise the performance and arrangements of local authority landlords?</p>
Stigma	<p>How could we support or deliver a best neighbourhood competition?</p>
	<p>In addition to sharing positive stories of social housing residents and their neighbourhoods, what more could be done to tackle stigma?</p>
Professional - isation	<p>What is needed to further encourage the professionalisation of housing management to ensure all staff delivers a good quality of service?</p>
	<p>What evidence is there of the impact of the important role that many landlords are playing beyond their key responsibilities?</p>
	<p>Should landlords report on the social value they deliver?</p>
Anti-social behaviour	<p>How are landlords working with local partners to tackle anti-social behaviour?</p>
	<p>What key performance indicator could be used to measure this work?</p>
	<p>What key performance indicator should be used to measure whether landlords are providing good neighbourhood management?</p>