

When Social Housing Governance and Financial Regulation Fail



Procurement and Supply Chain Management Made Simple.

Foreword: Rules That Protect Tenants

Housing associations manage resources raised through rents, public grants, borrowing and other sources to maintain homes and provide services. Decisions about how that money is used affect repairs, safety work, investment and the ability to service debt, so clear financial controls matter. Governance codes set expectations for board oversight, while financial regulations and internal policies put them into practice by defining who may approve spending, how suppliers are selected, how conflicts are managed and what records must be kept for scrutiny.

Procurement is where those rules meet the outside world. Clear approvals and competitive processes help ensure repairs, maintenance, and building-safety work are properly specified, fairly priced, and delivered by capable contractors. Contract monitoring can expose problems early, before a failing supplier leaves damp unrepaired or a fire door unfitted. Without that discipline, avoidable cost, delay and unreliable work become far more likely, and tenants are usually the first to notice.

Good governance also gives directors dependable information about risk, spending and service quality, allowing them to test whether problems are being fixed and whether resources will stretch to meet long-term commitments. The central question is what happens when these safeguards are ignored, weakened or quietly bypassed. The answer, drawn from regulatory judgements, parliamentary inquiries and published payment data across the United Kingdom (UK), is rarely one dramatic failure but an accumulation of smaller ones.

These observations draw on the author's more than ten years' experience in social housing and on governance and procurement behaviours encountered during that work. They are professional observations, not findings from a representative survey or claims about all providers. The housing association discussed remains unnamed to protect its identity. The report describes its decisions as fairly as possible, separating observation from interpretation. The named regulatory cases concern other providers.

Why Governance and Financial Regulations Exist

Financial regulations translate a board's legal and regulatory duties into everyday controls: delegated authority limits, approval routes, purchasing thresholds, conflict declarations and record-keeping requirements. For a housing association, these controls protect rental income and housing assets, direct scarce money towards repairs and safety, and show tenants, lenders and regulators that decisions were authorised and defensible. Their value is greatest precisely when operational pressure tempts managers to take shortcuts in the name of speed.

In England, the Regulator of Social Housing (RSH) sets the standards that registered providers must meet. Its Governance and Financial Viability (GFV) Standard requires private registered providers to adhere to relevant law, comply with their governing documents, protect social housing assets and maintain an effective risk management and internal controls assurance framework.¹ Providers must adopt an appropriate code of governance, explain any departures from it and assess their governance effectiveness at least once a year.

The standard is equally demanding on money. Providers must maintain a robust and prudent business planning, risk and control framework that secures access to sufficient liquidity at all times, rests on reasonable forecasting assumptions, accurately reports delivery of plans and monitors compliance with funders' covenants. The board must approve the financial framework, and its effectiveness must be reviewed at least annually. Providers must also communicate promptly with the regulator about material or potential non-compliance.¹

The sums at stake are substantial. The RSH's 2025 Global Accounts, covering 200 large private registered providers, show that repairs and maintenance spending rose 13% to a record £10 billion in 2024/25, of which £3.9 billion was capitalised. Providers also spent £14.2 billion on development and delivered 54,000 new homes, while investment in existing stock is forecast to average £10.9 billion a year over the following five years.²

Rules also make decisions reviewable. A clear record of authority, competition, evaluation, conflicts and contract approval lets directors test whether value was achieved and whether exceptions were justified. Without it, a board may receive reassuring summaries while inconsistent practice continues beneath them. One procurement breach does not, by itself, establish financial non-compliance, but repeated weaknesses can create unplanned commitments, erode budgets and gradually undermine the resilience on which lenders and tenants rely.

How the Regulator Grades Governance and Viability

The RSH publishes governance grades from G1 to G4 for private registered providers owning 1,000 or more social homes. G1 means the provider meets governance requirements, while G2 means it meets them but must improve some arrangements. G3 means requirements are not being met and serious regulatory concerns exist, and G4 adds regulatory intervention or enforcement action. These are judgements about a whole organisation, not scores calculated from a checklist of individual transactions.

Viability grades follow the same pattern. V1 indicates capacity to deal with a wide range of adverse scenarios, while V2 signals capacity for a reasonable range, provided material risks are managed. V3 and V4 mean viability requirements are not met, with V4 associated with intervention or enforcement. Importantly, the GFV Standard does not apply to local authorities, so councils receive consumer grades from C1 to C4 but no governance or viability grades.³

Worthing Homes shows how procurement weaknesses can move a grade. Following an inspection completed in April 2026, the RSH downgraded the South East landlord, which owns around 4,250 homes and reported turnover of £31.6 million, from G1 to G2. It cited weaknesses in oversight of data quality, procurement and contract management, with reviews of the repairs service revealing ineffective oversight of performance and cost control, evidenced by recent repairs overspends.³

Regulatory downgrades are not isolated. In the June 2025 publication that confirmed Anchor's

governance downgrade, discussed later, the RSH also moved First Garden Cities Homes and Southway Housing Trust from G1 to G2 and regraded each from V1 to V2 following inspections.⁴ None of these judgements resulted automatically from an isolated error; each reflected the regulator's assessment of the evidence, organisational context and accumulated concerns.

The Cost of Treating Rules as Optional

Bypassing approval limits or competition narrows the supplier field, weakens price comparison, and leaves an association unable to explain why it chose a particular contractor. Unmanaged conflicts can damage confidence in a decision, even when no one benefited improperly. Incomplete contract records make it harder to verify scope, price, performance or change control. The predictable results are poor value, disputes, adverse audit findings and expenditure that nobody with proper authority ever approved.

Weak procurement also damages services. A contractor appointed without adequate checks may lack the capacity, insurance, skills or safety systems that housing work demands. Missed repairs or statutory checks then affect residents directly, while emergency replacement arrangements can cost more than planned purchasing. None of these outcomes is automatic, which is why boards need reporting that links supplier performance to repairs, building safety, and resident experience, rather than treating procurement as a back-office function.

The wider economy shows why payment discipline matters. Research commissioned by the Department for Business and Trade (DBT) with the Small Business Commissioner (SBC), published in July 2025, estimated that late payment costs the UK economy almost £11 billion a year. Around 1.5 million businesses, 28% of the total, are affected annually, collectively owed about £26 billion at any time, averaging £17,000 each, and roughly 14,000 close every year as a result.⁵

Late payment weakens housing supply chains: smaller contractors may struggle to retain workers, buy materials or sustain emergency call-outs, while affected businesses spend 86 hours annually chasing overdue invoices. The Government describes the reforms as the Small Business Protections Bill, formally before Parliament as the Commercial Payments Bill [HL]. Following report stage on 15 September 2026, third reading is scheduled for 20 October. Proposals include a 60-day cap, interest and enhanced SBC powers.^{5 6}

Carillion remains the starkest warning. When the contractor entered compulsory liquidation in January 2018, it had liabilities of nearly £7 billion and just £29 million in cash. A joint parliamentary inquiry found that it owed around £2 billion to some 30,000 suppliers, subcontractors and other short-term creditors, and enforced standard payment terms of 120 days despite signing the Prompt Payment Code. The government committed £150 million to keeping essential public services running.⁷

The committees' diagnosis matters as much as the numbers. They concluded that non-executive directors failed to scrutinise or challenge executives, and that accounts were manipulated to present optimistic revenue assessments in defiance of internal controls.⁷ Public bodies are not immune. Thurrock Council issued a section 114 notice in December 2022, after financial losses from commercial investments and the need to repay investment debt left an in-year funding gap of around £470 million.⁸

Procurement Decisions and the Board's Oversight

The board should seek assurance that procurement controls operate effectively in practice, rather than merely confirming that policies exist. Reporting should cover expenditure by value and procurement route, approval compliance, competition waivers, contract variations, declared conflicts, supplier performance, overdue actions and unresolved audit recommendations. Rising waiver use, repeated awards to one supplier without adequate justification, or unexplained cost growth should prompt challenge, supporting evidence and a documented management response within an agreed timescale.

Internal audit can test controls from requisition to payment, including delegated authority, tender records, evaluation, contract approval, invoice matching and change control. Its role is to provide assurance, not substitute for management. When weaknesses are identified, management should assign named owners and deadlines, while the board or audit committee monitors evidence of closure. A report that identifies a weakness without establishing whether it was corrected provides only limited assurance about the organisation's continuing exposure.

Published payment data shows how transparency exposes both progress and cost. The Department of Health and Social Care paid 97% of invoices within 30 days in July to September 2025, yet recorded late-payment interest liability of £25,284.49 for that quarter alone. Three years earlier, in July to September 2022, it paid only 83% within 30 days and carried a liability of £406,508.66.⁹ Strong headline percentages can still conceal exceptions worth investigating.

Thurrock Council's published figures tell a similar story. It paid 97.70% of invoices within 30 days in 2024/25, paid £878.08 in interest and estimated its potential liability at £110,565.11, noting that suppliers decide whether to claim. In 2019/20, performance stood at 90.09%, with an estimated liability of £503,453.78.¹⁰ Publishing both performance and liability allows scrutiny committees to ask what the figures mean and what action followed.

Category Managers: Mentoring and Challenge

Category managers—in this case, property surveyors responsible for maintenance across defined areas—turn organisational priorities into specifications, supplier decisions and contract outcomes. Executive directors and heads of function should ensure they understand delegated approval limits, procurement requirements, conflict declarations, evaluation records, and when to seek specialist advice. Guidance should come before employees make significant purchasing decisions, with managers available to answer questions and constructively challenge decisions.

Following leadership changes and the expiry of the previous Framework Agreement, a new Property Surveyor had to procure a replacement kitchen and bathroom installer to maintain the planned replacement programme. The surveyor was not given clear guidance on the Association's procurement policy, approval requirements or timetable. When the Procurement Manager questioned the proposed route, the Head of Property Services did not assist or intervene, and the Operations Director did not resolve the disagreement or direct the surveyor.

The proposed route was a call-off from a third-party framework. Under the Procurement Act 2023, a framework call-off may be used where the framework and proposed contract meet the Act's requirements. This includes confirming that the Association is entitled to use the framework, that the works fall within its scope and that the call-off follows its stated process. These statutory requirements apply only where the Association is a contracting authority, and the proposed contract is within the Act's scope.

The Act's requirements do not replace the Association's own procurement policy, approvals or financial regulations. According to the account provided, the Association's rules set open tender as the default for above-threshold procurement. A framework should not be selected simply because it appears convenient: the proposed route must satisfy both applicable legislation and the Association's internal controls. Where the Act does not apply, the Association's own rules and any relevant framework conditions still govern the decision.

The disagreement should have prompted clear direction, coaching and a recorded decision. The Head of Property Services should have supported the Procurement Manager, explained the requirements to the surveyor and helped identify a compliant route. The Operations Director should have clarified accountability and ensured that the procurement decision was properly authorised before the process continued.

The Association then appointed an interim external procurement adviser to run tender exercises and support supplier appointment recommendations. That appointment did not

transfer the Association's compliance responsibility. The adviser needed clear instructions on the applicable procurement route, delegated authorities, approvals, evaluation, conflicts, contract terms and record-keeping, with management review at key stages.

According to the account provided, the adviser was unfamiliar with the Association's requirements. Although the rules required an open tender, the Association allowed a closed tender with invited suppliers, described as loosely based on a third-party framework arrangement. This was a different route from the proposed framework call-off. The Association should have required the open competition specified in its rules and checked the specification, evaluation criteria, approvals, conflict controls, and records before issuing tenders.

The Association also issued the tender documents without a works agreement or contract setting out the terms suppliers would be expected to accept. Bidders therefore could not assess legal and commercial risks consistently. That uncertainty could have increased prices, limited competition or deterred suppliers; it also weakened the audit trail and could make performance obligations harder to enforce. Senior management should have ensured the contract terms were settled before issuing tenders or making an award.

New Employees and Supplier Selection

New employees need a practical procurement induction before selecting suppliers or committing organisational funds. Training should cover the Association's policy, approval limits, competition requirements, framework use, conflicts, evaluation and contract terms. Staff should know where to obtain advice and how to escalate a disagreement. Publishing a policy on the intranet does not replace instruction, supervision or clear accountability.

The surveyor's experience shows why induction must match the employee's role and experience. Before issuing a tender, a procurement professional should review the proposed tender process, tender specification, evaluation criteria, approvals, and draft contract. Tender documents should set out the material terms suppliers must accept, including relevant provisions on liability, insurance, payment, variations, delay and dispute resolution.

Where an external adviser is used, management should provide clear instructions and check the work rather than assume the adviser knows or will apply local requirements. Approval systems should prevent commitments beyond delegated limits and require authorisation before issuing a purchase order. Records should identify the requester and approver, procurement route, supplier, contract value, evaluation outcome, terms and declared conflicts, so the decision can later be examined.

Four public cases illustrate related risks. They do not establish that the same events occurred in the case described, but they show why procurement activity, external support and contract management need active oversight.

Fairfield Housing Association: *The Scottish Housing Regulator reported poor procurement practice, including contracting arrangements that did not comply with Scottish Government requirements and had inherent weaknesses. It also identified long-running contracts with external professional advisers. The case illustrates the risks of weak procurement controls and insufficient review of adviser and contract arrangements. The Scottish regulatory and procurement context differs from England's.¹¹*

Allnutt Mill Housing Co-operative: *The Regulator of Social Housing found that a managing agent carried out some procurement functions, but the co-operative had not maintained appropriate oversight of spending against budget. Material unbudgeted expenditure and inadequate committee scrutiny contributed to serious financial pressure. The lesson is that delegating procurement work does not delegate the governing body's responsibility to oversee spending and controls.¹²*

Worthing Homes: *The regulator identified weaknesses in procurement and contract management of its repairs service, alongside recent repairs overspends. It said the association was addressing longstanding issues through a new service model and improved oversight.*

This demonstrates the connection between procurement decisions, contract management and the cost and quality of repairs.¹³

Christian Action (Enfield) Housing Association: *The regulator identified weaknesses in risk management, financial governance and board oversight, and reported that the association had nearly breached its loan terms. The regulator's 2026 review also identified contract management as an area requiring further improvement. The case illustrates why leaders need reliable information, clear accountability and timely challenge when controls are not working.¹⁴*

Induction and supervision should be reinforced by systems that prevent commitments above an employee's delegated limit and require approval before a purchase order is issued. The audit trail should record the requester, approver, procurement route, supplier, contract value, evaluation outcome, contract terms and any declared conflicts. These controls make it possible to see whether decisions were authorised, whether advice was considered and whether corrective action was taken.

When Procurement Warnings Are Not Acted On

A procurement warning should create a traceable decision. The record should capture what the procurement manager said, when it was raised, who received it, the rule or evidence cited and the action taken. Where a purchase appears to exceed delegated authority or bypass competition, the manager should identify the relevant control and recommend a proportionate next step, such as pausing the commitment or seeking properly authorised approval before proceeding.

The response should be proportionate, but silence is not a control. The responsible executive director or delegated senior officer should accept the advice, commission further review or authorise a properly justified exception within their authority, recording the reasons and any conditions. If the issue remains unresolved or suggests possible misconduct, employees should know how to escalate it through procurement leadership, finance, internal audit or the relevant board committee, and should be protected when doing so.

Unheeded warnings can quickly become regulatory problems. Private registered providers must tell the RSH promptly about material non-compliance, and the regulator expects every landlord, councils included, to surface failures before inspectors find them.¹ When it graded Harlow District Council C3 in September 2024, the RSH explained that it had identified the problems by scrutinising the council's reported Tenant Satisfaction Measures (TSMs), and reminded landlords that notifying it of material issues is their responsibility.¹⁵

Public-sector rules show why oversight must test practice rather than accept assurances. Under Procurement Policy Note 021, central government departments must build rights to spot-check supply-chain payments into contracts worth more than £5 million a year, confirming that subcontractors are paid within 30 days. The policy covers contracts advertised from 1 October 2025, and other public bodies may adopt it.¹⁶ Housing associations can borrow the principle, whatever their legal status.

Property Services and the Supply Chain

A head of property services must turn the housing strategy into a deliverable maintenance plan covering required work, service standards, budgets, risk ownership, contract coverage and contingency arrangements. Leadership means setting priorities, allocating capable people, explaining procedures and checking that managers understand both service requirements and the procurement controls governing how suppliers are appointed, instructed and paid. Commercial literacy is now as important to the role as technical building knowledge.

Supply-chain planning should reflect the homes and residents served. It should map planned and responsive repairs, building-safety work, specialist trades, geographic coverage, seasonal demand, emergency capacity and reliance on subcontractors. Managers should know where capacity is fragile, whether alternative suppliers exist and how work would continue if a contractor failed. Carillion's collapse showed how suddenly a major supplier can

disappear, leaving clients scrambling to protect essential services.

The head of property services also develops the team's commercial capability. Staff need clear instructions on preparing specifications, assessing supplier competence, monitoring quality, escalating risks and recording decisions. Contract managers should review missed appointments, repeat repairs, complaints, safety actions and resident feedback alongside cost. A low price cannot represent value if work is incomplete, defects recur, or residents must repeatedly chase their landlord to get problems resolved.

Cost control belongs to the same discipline. At Worthing Homes, the regulator linked repairs overspend to ineffective contract management and noted that the landlord had appointed a new repairs contractor, work it described as still at a relatively early stage and requiring continued oversight.³ It also found that the landlord's financial profile had weakened since 2024 because of rising management and repairs costs, limiting its capacity to absorb adverse events.

Basildon Borough Council illustrates what happens when contractor oversight and information fail together. In April 2026, following a planned inspection, the RSH gave the council a C4 consumer grade, the lowest available, finding insufficient assurance of repairs performance, ineffective oversight of its contractor, poor data assurance for legal health-and-safety requirements and inaccurate information about home condition. Basildon became the seventh local authority to receive that grade.¹⁷

The council's own statement acknowledged a backlog of around 4,600 fire-safety remedial actions requiring better tracking.¹⁷ The regulator also found problems with the council's TSM reporting and no evidence that results had been analysed or used to improve services. It required fundamental change and intensive improvement, with enforcement still under review. For any landlord, the lesson is that contract management failures rarely stay confined to a single service.

One-to-One Meetings and Management Control

Regular one-to-one meetings between executive directors, heads of function and managers help align priorities, test progress and identify problems that dashboards may miss. A useful meeting reviews current risks, pending decisions, supplier or staffing pressures, effects on tenants and actions from the previous discussion. It should produce a concise record of agreed actions, owners and deadlines, preventing important issues from disappearing between teams, committees and formal reporting cycles.

For a property function, these conversations connect repairs demand, contractor capacity, safety checks, planned investment, complaints and resident feedback. Procurement managers can flag upcoming renewals, spend approvals, weak competition or supplier concerns before they become urgent. Finance and operational managers can reconcile forecasts with commitments and expected work, reducing the temptation for a service team to make an unauthorised purchase to solve an immediate problem under pressure.

When meetings are repeatedly missed, the concern is not a declined calendar invitation but the consequences: decisions left unmade, risks without owners, inconsistent instructions and managers with no route to challenge a plan. Frequency should reflect risk, with monthly discussions suiting routine planning and urgent safety matters demanding faster escalation. Proportionate records also reveal patterns such as repeated slippage, recurring contractor failure or actions closed administratively without evidence of improvement.

What the TSMs Show

The TSMs are a standard set of performance measures that registered providers in England must calculate and publish annually. Since the RSH added an electrical safety measure in June 2026, the framework has comprised 23 measures: 12 drawn from tenant perception surveys and 11 generated from management information.¹⁸ They aim to give tenants greater transparency about landlord performance and to inform the regulator about compliance with

consumer standards.

The 12 perception measures cover overall satisfaction, repairs, repair time, whether the home is well maintained and safe, whether the landlord listens and keeps tenants informed, fair and respectful treatment, complaint handling, communal areas, neighbourhood contribution and anti-social behaviour. Question wording and response options are prescribed, and responses must be weighted where necessary to represent the tenant population. They capture reported experience but cannot, on their own, explain why a service performed well or poorly.

The 2024/25 results, published in November 2025, draw on nearly half a million tenant surveys conducted by large landlords. Seven in ten tenants in low-cost rental accommodation were satisfied with their landlord's overall service, while 18% were dissatisfied. The median landlord recorded 74% satisfaction with repairs, 78% satisfaction that homes were safe and 78% agreement that tenants were treated fairly and respectfully, but only 36% satisfaction with complaint handling.¹⁹

These figures are benchmarks, not targets. Differences in landlord size, tenant profile and collection method affect comparisons, and 71% of landlords used telephone surveys as their main method in 2024/25.¹⁹ The regulator has noted that small changes in collection methods can partly explain year-on-year movements in average satisfaction. Boards should therefore interpret shifts in their own results cautiously, seeking corroborating evidence before either celebrating improvement or reacting to apparent decline.

Responsibility for accuracy rests with governing bodies. The technical requirements state that boards of private registered providers and governing bodies of local authority landlords are ultimately responsible for ensuring reported measures are accurate and comply with regulatory requirements.¹⁸ This responsibility cannot be delegated to a survey contractor or performance team. Audit committees should therefore review data assurance regularly and whenever material concerns arise, supported by testing of source records, calculations and reporting controls.

Reading Repairs, Safety and Condition Data

The management-information repair measure, RP02, reports the proportions of emergency and non-emergency responsive repairs completed within the landlord's published target timescales. Completion must be measured end to end, from when the problem is first reported until the repair is recorded as completed. The measure covers work delivered by contractors or directly employed teams, including communal-area repairs, but excludes planned and cyclical works. It therefore reflects the responsive service tenants experience.¹⁸

Recent legal changes have sharpened the measure. Following the Hazards in Social Housing (Prescribed Requirements) (England) Regulations 2025, known as Awaab's Law, the technical requirements were updated in March 2026 so that defects representing emergency hazards must be counted as emergency repairs, and significant hazards generally as non-emergency repairs.¹⁸ Across large landlords, 79% of the 11 million non-emergency responsive repairs completed in 2024/25 met target timescales.¹⁹

RP01 reports homes failing the Decent Homes Standard and is not interchangeable with perception measure TP04, which asks whether tenants feel their home is well maintained. A provider can therefore score quite differently on each. Divergence should prompt analysis of property-level condition data, investment programmes, and tenant experience, rather than assuming one figure disproves the other. Both depend on accurate stock condition information, which several recent regulatory judgements have found lacking.

Building-safety measures cover gas, fire, asbestos, water, lift and now electrical checks, reporting the proportion of relevant homes for which all required checks were completed at year-end. Denominators matter. In the regulator's worked example, a landlord with 10,150 homes requiring gas checks, including 100 flats served by one unchecked communal boiler and 1,000 unchecked houses, reports 89% compliance, showing how a single communal

failure affects every flat it serves.¹⁸

The electrical safety measure, BS06, came into effect on 11 June 2026. Large landlords, those with 1,000 or more homes, must publish it for the first time for the 2026/27 reporting year, with results reflecting the position at 31 March 2027, while smaller landlords publish for reporting years ending on or after that date.²⁰ The measure creates no new legal duty, because landlords should already have been carrying out these checks.

A reported percentage has limits. The building-safety measures deliberately exclude completion of remedial actions identified by inspections, although the technical requirements stress that those actions must still be carried out.¹⁸ A landlord could therefore report every fire risk assessment as complete while hundreds of high-risk actions remain outstanding. Boards need separate reporting on overdue remedial work, categorised by risk level and age, to understand whether residents are genuinely safer.

Harlow demonstrates the value of reading these measures critically. After reviewing the council's submission, the RSH found that fire risk assessments had been completed for only around 20% of the buildings requiring them across its 9,100 social homes. More than 500 high-risk and around 1,500 medium-risk fire-safety actions were overdue, most by over 12 months. The regulator also criticised weak oversight, with key safety information submitted without sufficient scrutiny.¹⁵

Engagement, Complaints and Neighbourhood Measures

Three perception measures address engagement: whether the landlord listens and acts on tenant views, keeps tenants informed and treats them fairly and with respect. Results should be read alongside evidence of tenant involvement, access to services and whether feedback has actually changed decisions. A favourable score does not prove that every group is heard equally, and a low score should prompt investigation into whose experience is being missed, and why.

Complaints appear in both survey and management data. TP09 records satisfaction with complaint handling, CH01 reports stage one and stage two complaints per 1,000 homes, and CH02 reports responses within the Housing Ombudsman's Complaint Handling Code timescales. Under the 2024 Code, a stage one response is due within 10 working days of acknowledgement and a stage two response within 20 working days, with limited extensions for complex cases.¹⁸

Sector performance reveals a striking gap between process and perception. In 2024/25, 78% of more than 290,000 stage one complaints received responses within Code timescales, yet median satisfaction with complaint handling was just 36%.¹⁹ Volume alone is ambiguous, since a rise may reflect worsening service, better awareness or easier reporting. More useful questions concern fair investigation, meaningful remedies, repeat issues and whether learning genuinely changes future service delivery.

Neighbourhood measures combine tenant views on communal cleanliness, neighbourhood contribution and anti-social behaviour handling with NM01, which counts anti-social behaviour cases, including those involving hate incidents, per 1,000 homes.¹⁸ These indicators can highlight estate services, case handling and communication, but they do not capture every local outcome. Landlords may need supporting information on case severity, response times, repeat incidents and tenant safety before drawing reliable conclusions.

Financial Viability in Practice

Financial viability is not simply whether rent covers this month's bills. The RSH expects providers to maintain sufficient liquidity, base plans on reasonable assumptions, stress-test adverse scenarios and monitor lender covenants. Boards need reliable forecasts linking income, debt, repairs, investment and long-term commitments so they can act before a cash-flow warning threatens homes, services or continued operation.

South Yorkshire Housing Association (SYHA), with 5,700 homes and £46.5 million group turnover in 2021/22, illustrates how governance and viability failings can emerge before insolvency. In June 2023, the RSH downgraded it from G2 to G3 and V2 to V3 after finding it had miscalculated covenant compliance over several years. A historic breach, forecast breach and cross-default clauses exposed it to wider loan risks; inaccurate information reached funders, the board and regulator.²¹

The RSH found no immediate liquidity or solvency concerns, but said control failures exposed social housing assets to undue risk and the business plan relied on uncertain cash flows. Separately, SYHA offered an improvement plan and voluntary undertaking, which the regulator accepted in March 2024 and later confirmed had been honoured. The judgement was withdrawn on 28 January 2026, after SYHA became a subsidiary of Places for People Group on 1 December 2025.²¹

My Space Housing Solutions offers a V4 example. In 2022, it reported 1,817 supported-housing units and £27.3 million turnover. The RSH downgraded it from G3/V3 in 2020 to G4/V4 in December 2022 and began enforcement action, saying it could not assure the regulator it was solvent and appeared reliant on continued third-party support to trade. It also cited weak liquidity planning and concerns about connected-party property transactions.²²

My Space's 2024 accounts record a later development: a Company Voluntary Arrangement (CVA) was agreed on 7 March 2025 following lease and debt restructuring, restoring solvency on both a balance-sheet and cash-flow basis. This outcome should be read alongside, not as a revision of, the RSH's 2022 V4 judgement. That judgement describes the provider's position at the time; the CVA records a subsequent restructuring and recovery measure.²³

These judgements show the difference between serious weakness and proven insolvency. V3 means the provider does not meet viability requirements and is working with the regulator; V4 means intervention or enforcement. Neither grade alone declares a provider insolvent. Both show why boards need to monitor cash forecasts, covenant headroom, lease exposure and downside scenarios, and connect financial warnings to plans for repairs, safety work and service continuity.

How Procurement Affects Tenant Outcomes

Procurement decisions shape the capacity, skills and incentives of the suppliers delivering repairs, maintenance and safety work. Specifications that omit response times, quality standards, reporting duties or resident-care requirements make later performance difficult to assess. A competitive process should test more than price, examining relevant experience, workforce capacity, subcontracting, safety arrangements, geographic coverage and how the supplier will evidence completed work to the landlord's satisfaction.

Contract management turns those promises into daily service. Landlords should track attendance, completion, repeat visits, outstanding remedial actions, complaints and resident communication against agreed requirements. Where contractor data feeds the landlord's systems, the contract should define formats, validation, correction and audit access. Anchor's experience is instructive: it self-reported to the regulator after discovering that contractors were failing to complete electrical remediation work to specification and on time.²⁴

Poor supplier management may contribute to delayed repairs, repeat visits and unresolved complaints, which in turn depress both perception and operational measures. Correlation, however, does not prove causation. Investigation should trace individual work orders, appointment records, supplier reports and tenant feedback to establish where the process broke down. The practical test is whether managers intervene early and can later show what they knew, when they knew it and whether outcomes improved.

Performance Data: Accuracy, Assurance and Alleged Manipulation

Every reported figure needs a defined measure, a reliable source, a consistent period and an accountable owner. For housing services, the underlying records include work orders,

appointment outcomes, safety certificates, inspection results, complaint logs and survey responses. A data dictionary should set out each measure's scope, denominator, exclusions, target and calculation, allowing managers and auditors to reproduce reported results directly from source records without relying on explanation or memory.

Checks should occur before figures reach dashboards, board papers or regulatory returns. They can include exception reports, sample testing against source documents, tests for duplicate or missing records, reconciliation between contractor and landlord systems and review of late changes. The person preparing data should not be the only person approving it, and material corrections should retain a dated audit trail showing original and amended values, the reason and the authorisation.

Anchor, the largest provider in England of specialist housing and care for older people, provides a salutary example. In February 2025, the RSH gave it a C3 consumer grade for serious failings, and in June 2025 downgraded its governance from G1 to G3, finding insufficient assurance that its data was robust or that systems ensured key information was accurately reported. Its viability grade remained V1.⁴

The language matters. Anchor had itself identified errors in its health-and-safety compliance reporting and begun reviewing its data; the regulator described errors, and that finding should not be recast as deliberate manipulation without separate evidence.⁴ Its interim chief executive apologised and accepted the judgement in full.²⁴ Boards should apply the same discipline internally, distinguish error from misconduct, and investigate allegations fairly before labelling anyone responsible.

The London Borough of Newham shows how weak information conceals risk. When the RSH issued its first-ever C4 grade in October 2024, it found more than 9,000 overdue fire-safety remedial actions, over 4,000 of them high risk. Some 40% of the council's 16,000 homes had not received an electrical condition test for more than 11 years, and 60% had no stock condition survey within five years.²⁵

When figures appear inconsistent, the first task is to establish the cause: a definition change, system migration, incomplete contractor feeds, human error, weak controls or deliberate alteration. Evidence may include source records, version histories, system permissions, emails, approvals and explanations from data owners. Findings should clearly state what is established, what remains uncertain, and what correction or control improvement is required, without treating suspicion alone as proof of misconduct.

Competence, Transparency and Tenant Access to Information

The new Competence and Conduct Standard takes effect on 1 October 2026. Originally proposed as part of the Transparency, Influence and Accountability Standard, it was issued separately to increase its visibility for tenants and landlords. It requires landlords to ensure that relevant staff have the skills, knowledge, experience and behaviours needed to deliver a high standard of service, making professional capability an explicit organisational responsibility.²⁶

Qualification requirements apply to in-scope senior housing managers and senior housing executives, subject to defined exemptions. The government's policy statement specifies a relevant Level 4 qualification for senior housing managers and a Level 5 qualification or foundation degree for senior housing executives.²⁸ Providers with 1,000 or more homes have a three-year transition; smaller providers and their service providers have four years.²⁷ The requirement is phased, not an immediate obligation on every individual from October 2026.

The revised Transparency, Influence and Accountability Standard also introduces the Social Tenant Access to Information Requirements (STAIRs) for private registered providers. From 1 October 2026, they must proactively publish specified information about how they manage social housing, and from April 2027 they must respond to information requests from tenants or their designated representatives.²⁶ Providers need processes to identify the information

they hold, keep it current and make it accessible.

STAIRs give tenants of private registered providers broadly similar access to information to that enjoyed by council tenants under the Freedom of Information Act 2000.²⁶ They should not, however, be described as bringing housing associations within that Act. Providers must explain the reason if they refuse or delay a request, and should have a published policy explaining when information may reasonably be withheld. Tenants can challenge the handling or outcome through the provider's review process and, if dissatisfied, refer the matter to the Housing Ombudsman; the regulator oversees providers' compliance with the standard.

Together, these standards make competence and transparency essential parts of service accountability. A housing association should be able to identify who was responsible for each material decision, what authority and guidance they had, what training they received, what evidence they considered and how the outcome was reviewed. It should also maintain sufficient records to enable tenants, the board, auditors and regulators to scrutinise relevant decisions through the appropriate channels.

Where services fall below the required standard, the Association should investigate the cause and assign responsibility according to the evidence. That evidence may show failings by an employee, inadequate supervision, unclear instructions, insufficient resources, defective systems or weaknesses in senior management oversight. Relevant responsibilities, policies, training records, correspondence, information requests, responses and recorded reasons should therefore be examined. Accountability should follow established facts, ensuring that failings are corrected rather than overlooked, assumed or passed between teams.

Accountability and Corrective Action

Establishing what happened requires a dated trail of evidence. Relevant material may include financial regulations, delegated authority schedules, procurement plans, tender and evaluation records, conflict declarations, induction records, warning emails, meeting records, approval logs, contracts, supplier performance data and the source records behind published returns. Evidence should be preserved in its original form wherever possible, with separate records of later corrections, decisions and the explanations offered for them.

An investigation should test both the event and the control system around it: who made or approved each decision, which rule applied, whether advice was received and whether records support the reported account. It should distinguish honest mistakes, unclear guidance, weak supervision, control failures and deliberate conduct. Where a material issue may affect compliance or tenant safety, the provider should consider its duty to notify the regulator and act promptly.

Corrective action should match the cause and include evidence that the fix works. Options include independent review, corrected data, tighter approval controls, targeted training, revised supervision, supplier recovery plans and board-monitored actions with named owners and deadlines. Torus62 shows that recovery is achievable: graded C2 after a May 2025 inspection, it delivered an improvement plan and was upgraded to C1 in April 2026 after strengthening safety oversight and repairs assurance.²⁹

A written action plan alone does not prove improvement. Follow-up should test whether decisions now comply with the rules, records reconcile to source data, and residents experience better services. Boards should not close actions solely because they have been marked complete administratively. They should require evidence such as repeat audit testing, reconciled data and improved tenant feedback. Sustained improvement, rather than visible activity, ultimately restores the confidence of tenants, lenders and regulators.

Summary: Governance Must Be Evident in Practice

Financial regulations and governance controls exist to protect tenants' homes, rental income and long-term viability. They set clear limits on spending, supplier selection, approvals and record-keeping, but provide assurance only when people understand and follow them.

Evidence from Carillion, Thurrock, Worthing Homes and Anchor is consistent: failure rarely begins with a single catastrophic decision, but with tolerated exceptions, unchallenged executives and information nobody properly tested.

Boards must oversee how controls operate in practice, while executive directors and heads of function should support and challenge category managers, induct new employees and treat procurement warnings as matters requiring a recorded decision and response. Property services leaders must plan supply chains realistically and actively manage contractors. TSMs, payment data, and regulatory grades provide useful signals, but each requires careful interpretation, reliable source records, and investigation before reaching conclusions about cause or blame.

Electrical safety reporting, the Competence and Conduct Standard and STAIRs are raising expectations of professionalism and transparency during 2026 and 2027. If enacted, the Commercial Payments Bill [HL], which the Government describes as the Small Business Protections Bill, would strengthen payment protections and enforcement. Effective accountability depends on reliable evidence, candid reporting and corrective action with clear owners. Claims of ignored warnings or manipulated data must be substantiated and distinguished from honest error.

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