



Regulator of  
Social Housing

# Consultation on changes to our consumer standards and requirements: Annex 5

Regulatory and equality impact considerations

9 December 2025



## Introduction

This document summarises our considerations of the regulatory and equality impacts of all the proposed changes to the consumer standards and requirements. These are changes to the Transparency, Influence and Accountability (TI&A) Standard and Consumer Standards Code of Practice (Code) in relation to the Social Tenant Access to Information Standard (STAIRs), competency and conduct, the reissuing of Tenant Satisfaction Measures (TSM) requirements under our new powers, and the proposed introduction of the electrical safety checks TSM.

For changes which relate to the STAIRs Direction or the Competence and Conduct Direction we have limited our consideration of the impacts to how we are proposing to apply our discretion to reflect those Directions, and how we are proposing to use the Code to amplify the standards those Directions require us to set. The regulator is required by legislation to comply with the Directions, and the government has undertaken its own impact assessments relating to the policy content for STAIRs and the competence and conduct requirements.

## Regulatory impact

### *Proposed revisions to the TI&A Standard and the Code*

In relation to the proposed changes to the TI&A Standard and the Code that are related to the STAIRs Direction or the Competence and Conduct Direction, we have concluded that how we are proposing to word and arrange the standards we are required to introduce, and how we are proposing to amplify those standards in the Code, is likely to have a minimal impact on the costs and benefits to the sector. This is based on the limited scope of our consideration, as described earlier, which we have judged to be proportionate. The nature of the Directions means we have limited discretion in this regard, and we have no discretion to change the related policy statements. Separately, the government conducted its own impact assessment of the [competence and conduct requirements](#) and [STAIRs](#).

There is also likely to be a minimal regulatory impact resulting from the proposed changes to the TI&A Standard and Code relating to the TSM requirements. This is because these changes would not alter the TSMs themselves or the technical or tenant survey requirements, and so what landlords are required to do to meet them would be unaffected. Also, the new proposed specific expectation that would become 2.4.1 of the revised TI&A Standard is broadly the same as the existing specific expectation at 2.4.3 (which the new 2.4.1 would be replacing). While we are proposing to further clarify this requirement in the Code, in essence this would be only further amplifying a requirement that already exists currently.

### *Proposed electrical safety checks TSM*

The proposed electrical safety checks TSM would, in effect, require landlords to collect, process and publish additional information, and (for large landlords) submit additional information to the regulator.

This means there are likely to be some costs to landlords, such as transitional costs of reading and understand the specific requirements of the proposed TSM, disseminating the information through organisations and updating processes and systems. However, overall we have considered that the costs to the sector of introducing the proposed TSM are likely to be minimal. This is noting the following in particular:

- broadly speaking, we consider that the information that landlords would be required to collect would be information that they would reasonably be expected to hold in ensuring they are meeting their legal health and safety obligations,
- the common requirements and timeframes for the collection, processing, publication and submission of the proposed TSM will be the same as the existing suite of TSMs, and

- the specific requirements of the proposed TSM would broadly mirror those for the existing building safety TSMs (which should similarly be generated from the landlord's management information).

In considering this we have had the benefit of having conducted a regulatory impact assessment when preparing for the introduction of the suite of TSMs in 2023.<sup>1</sup> The government also considered the impact of electrical safety checks in the social rented sector as part of its own impact assessment of the Social Housing (Regulation) Bill.<sup>2</sup>

In view of the above we have judged that it would not be proportionate for us to undertake a full regulatory impact assessment of the introduction of our proposed electrical safety checks TSM.

---

<sup>1</sup> [Annex 7: Tenant Satisfaction Measures - Regulatory impact assessment \(accessible\) - GOV.UK](#)

<sup>2</sup> [1906](#)

## Equality impact

Section 149 of the Equality Act 2010 sets out the general public sector equality duty (PSED).<sup>3</sup> It places a duty on public bodies to have due regard to the following three aims in exercising their functions:

1. eliminate unlawful discrimination, harassment, victimisation and any other conduct that is prohibited by or under that Act,
2. advance equality of opportunity between people who share a relevant protected characteristic and those who don't, and
3. foster good relations between people who share a relevant protected characteristic and those who don't.

The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, sexual orientation, and marriage and civil partnership.<sup>4</sup>

In developing our proposals, we have given due consideration to the above aims, and we will continue to do so in finalising our proposals following the outcome of this consultation.

We recognise that the PSED is a continuing duty and will review the evidence and our assessment in accordance with the duty. We want to use the consultation process to explore whether there might be any impacts to groups with protected characteristics which we haven't thought about.

We have summarised key points from our considerations below.

### *Groups likely to be impacted by proposal affecting social housing tenants*

Government analysis has reported that the implications of available demographic data on social renters are that any policy affecting the social rented sector is likely to have a greater than average impact (whether positive or negative) on women, people with disabilities and people from Black Asian and Minority Ethnic (BAME) backgrounds, because these groups are all more likely to live in the social rented sector. Also, any policy affecting the social rented sector is likely to have a greater than average impact on older people compared to the private rented sector, where they are less likely to live (however, the disproportionate impact on older people is not applicable in comparison to the owner-occupied sector, as there are greater numbers of people aged over 65 living there compared to the social rented sector).

---

<sup>3</sup> Also known as the general equality duty

<sup>4</sup> The definition of 'relevant protected characteristic' for the purposes of section 149 of the Equality Act 2010 does not include marriage and civil partnership, however, this is a protected characteristic for certain purposes of the duty to have due regard to the need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010.

### *Proposed STAIRs revisions to the TI&A Standard and Code*

We have reflected on potential risks of exclusion in connection with STAIRs that might arise from language barriers, literacy challenges, or digital exclusion. These could have a negative impact, particularly on equality of opportunity, for groups who share protected characteristics such as age, disability and race. We have considered that we could help mitigate these risks by making it explicitly clear in the Code that the specific expectation at 2.1.2 of the existing TI&A Standard also applies when delivering the STAIRs requirements. This requires landlords to ensure that communication with and information for tenants is clear, accessible, relevant, timely and appropriate to the diverse needs of tenants.

We have considered that, beyond this, our proposed revisions to the TI&A Standard and the Code in relation to STAIRs would be likely to have a neutral impact on the PSED aims. This is because they are predominately limited to reflecting the requirements of the STAIRs Direction, in line our statutory duty to comply with that Direction.

### *Proposed competence and conduct revisions to the TI&A Standard and Code*

Similarly to our proposed revisions in relation to STAIRs, our proposed revisions in relation to the competence and conduct requirements are largely limited to reflecting the Competence and Conduct Direction. In view of this we have considered that, in the main, our proposed revisions relating to that Direction are similarly likely to have a neutral impact on the PSED aims. However, we have considered that using our Code as follows should support improved outcomes for tenants, and thereby support equality of opportunity and protection for groups which share protected characteristics and are disproportionately represented in the sector:

- Reflecting the government's Direction, proposed changes to the TI&A Standard require landlords to develop or adopt an appropriate code of conduct for their relevant staff and to have a written policy which includes (among other things) their approach to managing and developing the skills, knowledge, experience and behaviours of their relevant staff. Our proposed changes to the Code would make it clear that landlords could choose to apply the code of conduct and written policy to a wider range of matters and staff than the standard requires. This could support improved outcomes for tenants by embedding positive cultural change across the organisation.
- The proposed wording of our Code makes it explicitly clear that landlords should consider how they meet the requirements of other regulatory standards when they develop their approach to managing and developing the skills, knowledge, experience and behaviours of their relevant staff. This clarification also aims to support improved outcomes for tenants.

### *Proposed TSM revisions to the TI&A Standard and Code*

We have assessed that the proposed changes to the TI&A Standard would have a neutral equality impact on the PSED aims. These changes would not alter the TSMs themselves or the

technical or tenant survey requirements and so would not change what landlords are required to do to meet them. Also, the new proposed specific expectation that would become 2.4.1 of the revised TI&A Standard is broadly the same as the existing specific expectation at 2.4.3 (which the new 2.4.1 would be replacing). For ease of reference, this is the specific expectation that relates to landlords ensuring that their reported TSM information is an accurate, reliable, valid, and transparent reflection of their performance.

However, we have considered that our proposal to further clarify this specific expectation in the Code should further strengthen its role in supporting the TSMs as a means of providing tenants with greater transparency about their landlord's performance, and as a source of intelligence for the regulator. It would also specifically emphasise the need for landlords to have a robust approach to collecting and processing management information. With this mind, we have considered that by supporting the delivery of improved outcomes for tenants, this change to the Code should support equality of opportunity and protection for relevant groups which are disproportionately represented in social housing. It could also have a positive impact on the need to foster good relations through further promoting an improved understanding of how landlords of social housing tenants are performing (including by reference to tenants' perceptions through the tenant perception measures).

#### *Proposed electrical safety checks TSM*

We have considered that the proposed introduction of the electrical safety checks TSM could have a positive impact on equality of opportunity for relevant groups which are disproportionately represented in social housing. This is because it will provide tenants with further transparency, and support tenants in holding their landlords to account, in relation to building safety. It will also provide a further source of intelligence to help the regulator drive improvement in how landlords operate in this area to achieve better outcomes for tenants.

Specific aspects of the proposed TSM that are intended to support transparency and accountability include that the TSM:

- has been designed to be similar to other building safety TSMs, allowing for a broadly consistent and clear set of measures;
- relates to all statutory obligations in relation to carrying out electrical safety checks (as opposed to being limited to checks required by a specific piece of legislation);
- in relation to each relevant home it would also capture electrical safety checks that relate to relevant communal or other parts of the building that the home is in, including checks for which a third party is responsible; and
- it makes clear that unless all required electrical safety checks have been carried out in relation to a home, they cannot be reported as having been carried out for the TSM, even if the reason for this concerned an inability to gain access.



© RSH copyright 2025

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3)

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at: [www.gov.uk/rsh](http://www.gov.uk/rsh)

Any enquiries regarding this publication should be sent to us via [enquiries@rsh.gov.uk](mailto:enquiries@rsh.gov.uk) or call 0300 124 5225.

or write to:

Regulator of Social Housing  
Level 2  
7-8 Wellington Place  
Leeds LS1 4AP

**The Regulator of Social Housing regulates registered providers of social housing to promote a viable, efficient and well-governed social housing sector able to deliver and maintain homes of appropriate quality that meet a range of needs.**