



**YMCA St Paul's Group response to
consultation on changes to consumer
standards and requirements**

March 2026



Introduction

YMCA St Paul's Group is a large, locally rooted YMCA working across London and surrounding areas. We are part of the wider YMCA Federation of England and Wales, combining strong local responsiveness with the reach, learning and resources of a national charitable movement. With over 150 years of work across London, our services are built on a long-standing legacy of community engagement and social action. We are a registered provider of social housing (registration number LH4078) and a registered charity (charity number 1041923), founded on a Christian ethos and a shared hope for a better future for individuals and communities. We seek to operate in an outcomes-focused and learning-oriented way, recognising the importance of strong governance, transparency and accountability in delivering high-quality services.

Our vision is to empower young people to thrive and to create inclusive, active and healthy communities where everyone can flourish. Each year we provide housing, care and support to approximately 1,650 residents across 45 sites in London, managing predominantly supported housing and hostel accommodation for young and vulnerable people who may have additional or complex needs. Our Housing, Care and Support services provide people with a safe place to call home alongside tailored support to help them build positive, independent futures. This is complemented by our Children, Youth and Families services, which support young people to be safe, connected and confident, and by our Health and Wellbeing services, which promote physical and mental wellbeing across our communities. Resident engagement is central to our approach: our resident engagement strategy is designed to ensure residents have meaningful opportunities to influence decisions at every level of the organisation, including those voices that are often less heard. We therefore welcome the opportunity to respond to this consultation and support the purpose and principles of the consumer standards in strengthening transparency, accountability and outcomes for residents.



Part 1: Proposed revisions to the Transparency, Influence & Accountability Standard

Consultation Question 1

Do you agree or disagree that the proposed change to the Transparency, Influence and Accountability Standard accurately reflects the government's STAIRs Direction to the regulator?

Response: Agree

We agree that incorporating the Social Tenant Access to Information Requirements (STAIRs) within the Transparency, Influence and Accountability (TI&A) Standard is structurally appropriate and reflects the government's stated direction to the regulator.

However, from an information governance perspective, we consider it essential that the implementation of STAIRs is clearly positioned within existing statutory and regulatory frameworks. In particular, accompanying guidance and the Consumer Standards Code of Practice should explicitly confirm that disclosures made under STAIRs must operate in accordance with UK GDPR, the Data Protection Act 2018, confidentiality obligations, safeguarding duties, and the rights and freedoms of third parties.

We would welcome explicit clarification that STAIRs does not create new individual rights of access to personal data beyond those already established under data protection legislation. Clear differentiation is needed between information intended to support organisational transparency (for example, policies, governance arrangements and performance information) and personal data relating to individual tenants, staff or third parties.

This distinction is especially important in supported housing contexts, where records often contain mixed personal data. Case files, complaints and incident records may include information relating to other residents, visitors, family members or next of kin, as well as material connected to safeguarding concerns, anti-social behaviour, criminal allegations, health conditions or other indicators of vulnerability. Such information may constitute special category data under Article 9 UK GDPR or criminal offence data under Article 10.

Without explicit guidance on redaction, anonymisation and third-party protections, there is a risk of inconsistent interpretation and inappropriate disclosure at an operational level. Clear and practical guidance would help ensure that the transparency objectives of STAIRs are achieved while maintaining compliance with data protection legislation and safeguarding responsibilities.



Consultation Question 2

Do you agree or disagree that the proposed changes to the Transparency, Influence and Accountability Standard accurately reflect the government’s Competence and Conduct Direction to the regulator?

Response: Agree

We agree that the proposed changes to the TI&A Standard accurately reflect the government’s Competence and Conduct Direction to the Regulator.

The proposed required outcome and specific expectations appropriately capture the intent of the Direction, including the focus on ensuring that relevant staff have the necessary skills, knowledge, experience and behaviours to deliver good-quality landlord services, and the requirement for providers to have a written policy and code of conduct that are accessible to tenants and subject to tenant influence and scrutiny.

We welcome the outcome-focused approach taken, which allows registered providers the flexibility to determine how best to meet the requirements in a way that is proportionate to their size, structure and operating context, while remaining accountable for delivery.

One area where further clarification would be helpful relates to the interpretation of “relevant staff” and the roles considered to be in scope of the requirements, particularly in organisations with diverse operating models. While we recognise that providers are expected to exercise judgement and provide a clear rationale for roles considered in or out of scope, additional guidance or illustrative examples would support consistency of interpretation across the sector and reduce the risk of unintended variation.



Consultation Question 3

Do you agree or disagree with the proposed changes to the specific expectations in the Transparency, Influence and Accountability Standard for the Tenant Satisfaction Measures (TSMs)?

Response: Agree

We agree with the proposed changes to the specific expectations in the TI&A Standard relating to Tenant Satisfaction Measures.

We support the strengthened emphasis on tenants having access to accurate, reliable and transparent performance information to enable effective scrutiny. The revised expectations appropriately reinforce the role of performance information in supporting transparency, accountability and meaningful tenant engagement, while maintaining an outcome-focused and proportionate regulatory approach.

We also welcome the encouragement for landlords, following engagement with tenants, to consider publishing TSM-related information at a more granular level and/or more frequently than the minimum regulatory requirements where this is meaningful and useful to tenants. This flexibility recognises that tenant priorities, service models and operating contexts vary across the sector, and that decisions about the format, frequency and segmentation of performance information are best informed by tenant engagement rather than prescribed centrally.

The proposed changes appropriately highlight the importance of involving tenants in decisions about how performance information is presented and shared, ensuring that published information reflects what tenants find most relevant and supports effective scrutiny. Overall, we consider that the proposed revisions strike an appropriate balance between regulatory consistency and local discretion, and accurately reflect the regulator's expectations in relation to the collection, reporting and use of TSM data.



Part 2: Proposed Changes to the Code

Consultation Question 4

Do you agree or disagree with the proposed changes to the Consumer Standards Code of Practice?

Response: Agree (with clarification requested)

We agree with the proposed changes to the Consumer Standards Code of Practice and support the alignment of the Code with the amended TI&A Standard.

From an information governance perspective, we would welcome clearer articulation within the Code of how the Social Tenant Access to Information Requirements (STAIRs) are intended to operate alongside existing legal and regulatory frameworks. In particular, it would be helpful for the Code to explicitly clarify:

- the interaction between STAIRs and existing Subject Access Request rights under data protection legislation;
- that disclosures made under STAIRs must not compromise the personal data or rights of other tenants or third parties; and
- expectations around the use of redaction, aggregation and anonymisation where information relates to multiple individuals.

This clarification is especially important in supported housing environments, where records frequently contain mixed personal data. For example, case files and other records may include information relating to other residents, visitors, family members or next of kin, as well as material connected to safeguarding concerns, anti-social behaviour, criminal allegations, health conditions or other indicators of vulnerability. In some cases, this information may constitute special category data or criminal offence data relating to third parties.

Clear and practical guidance within the Code on handling such information, including robust expectations for redaction and anonymisation, would help reduce the risk of unlawful disclosure and support consistent, lawful and proportionate implementation of the transparency requirements across the sector.



Part 3: Proposed introduction of the Electrical Safety Checks TSM

Consultation Question 5

Do you agree or disagree that the proposed Tenant Satisfaction Measure will provide an appropriate level of information about landlord performance in carrying out required electrical safety checks?

Response: Agree (with comments)

We agree that the proposed electrical safety checks Tenant Satisfaction Measure (TSM) will provide an appropriate and consistent baseline indicator of landlord performance in carrying out legally required electrical safety checks. Aligning the measure with the existing suite of building safety TSMs supports comparability, transparency and a clear focus on statutory compliance across the sector.

We support the proposed scope of the TSM, including its application to both individual dwellings and relevant communal or shared areas, and the inclusion of inspections, testing and investigative work required by law. We also recognise the rationale for measuring completion and recording of required checks, rather than prescribing how landlords manage remedial works, and for reporting compliance as at the end of the reporting year.

However, we note that electrical safety risks are only fully mitigated once any remedial actions identified through inspections are completed. While we understand that the TSM is intended to provide assurance that required checks have taken place, there is a risk that focusing solely on inspection completion may not fully reflect the overall safety position where remedial works remain outstanding or delayed. Whilst not looking to add further TSMs, we would welcome further consideration of how the regulator intends to gain assurance that identified risks are being addressed in a timely way, whether through complementary regulatory mechanisms, guidance, or future development of performance measures.

Overall, we consider the proposed TSM to be proportionate and appropriate as a transparency measure, and supportive of tenant understanding of landlord performance in relation to electrical safety, provided it is clearly positioned as part of a wider framework for managing and assuring building safety risks.



Impact Assessment

Consultation Question 6

Do you agree or disagree with the regulatory and equality impact considerations in Annex 5?

Response: Agree

We agree with the regulatory and equality impact considerations set out in Annex 5.

From an information governance perspective, we would emphasise the importance of ensuring that enhanced transparency obligations continue to operate alongside robust data protection safeguards. This includes the use of secure methods for information provision, appropriate identity verification processes, and strong protections for the personal data of third parties.

This is particularly relevant in supported housing contexts, where information may relate to individuals who share protected characteristics or who may be otherwise vulnerable, and where records frequently contain mixed personal data. Maintaining a careful balance between transparency, data protection and safeguarding will help ensure that the proposed changes deliver equitable outcomes without creating unintended risks or adverse impacts.

Conclusion

YMCA St Paul's Group welcomes the continued development of the consumer regulatory framework and appreciated the opportunity to contribute to this consultation. We remain committed to delivering transparent, accountable and high-quality services for our residents and customers and to working constructively with the regulator to support the effective implementation of these proposals.

Richard James

A handwritten signature in black ink, appearing to read 'James', written over a light blue horizontal line.

Chief Executive, YMCA St Paul's Group