

Together with Tenants consultation feedback

Key findings and how the Federation will respond

1. Introduction

We are grateful to all of the tenants, residents and housing associations who engaged in the Together with Tenants consultation process, which ran from 20 February to 19 April. Responses to the consultation will help set the aspiration and direction for the Together with Tenants project and guide the changes we need to make to the plan. The feedback also provides a really helpful steer on the work we need to do to guide and support housing associations as they implement the plan to ensure it delivers the meaningful change we know is so important.

This briefing, which should be read alongside the summary of Together with Tenants consultation feedback ([available here](#)) draws out some of the key themes emerging from the consultation responses, and explains how the Federation intends to respond. It also identifies areas that are out of scope of the Together with Tenants work, but that provide helpful insight into where the relationships between tenants, residents and housing associations could be strengthened.

Having analysed the feedback in detail, the Federation has identified some proposed changes to its draft [Together with Tenants proposals](#). The proposed changes will be considered by the [Tenant Advisory Panel](#) and [Member Steering Group](#) and once agreed, we expect to publish the changes in July.

By making these changes, we aim to ensure that the plan appropriately reflects the views of tenants, residents and housing associations as we move towards the next phase of this work – testing by our [early adopter group](#).

The formal consultation on the draft plan and charter has now closed. The next phase of this work will be a testing and evaluation process with the early adopter group, which we expect to run until spring 2020. We will update regularly on the progress of the early adopters and continue to talk to tenants, residents and housing associations about how the plan can work for them.

2. Key themes from the consultation

A key observation from the consultation process as a whole has been the level of interest in this work from across the sector, and in particular from tenants and residents. A significant proportion of the tenants and residents who responded commented that they welcomed the opportunity to give their views on the topics raised, and that they were hopeful that the process could deliver meaningful change for the sector.

There were some clear themes that emerged from the consultation response across all four questions. In particular, these focused on:

- **Impact:** the plan and charter need to lead to real change and not be a tick-box exercise.
- **Partnership:** the importance of creating an equal partnership that is valued by landlords.
- **Accessibility:** the plan and the charter need to be written in a way that is accessible and easy to understand. Alternative formats also need to be available.
- **Communication:** there needs to be a plan covering how tenants and residents will be kept informed about the development and implementation of the charter and the plan locally, bearing in mind varying levels of digital inclusion.
- **Language:** the language of the plan and the charter needs to be clear and purposeful, and should clearly set out what is expected from tenants, residents and housing associations.

3. The Together with Tenants draft plan

The consultation feedback suggests that tenants, residents and housing associations broadly support the actions set out in the Together with Tenants draft plan. However, based on the feedback, we know there are some changes we need to make, in particular to the charter.

We now feel confident moving forward with the plan – working with tenants, residents and housing associations – to create a system where boards are accountable to their tenants and residents, and where there is a culture across the housing association sector that values their voice and experience and uses this insight to inform decision-making.

A query that was raised frequently at events was whether the plan and charter would apply to leaseholders and shared owners. It is our intention that they should apply to all housing association tenants and residents regardless of tenure, but we will explore this with Tenant Advisory Panel, Member Steering Group and early adopters.

Some of the feedback referred to specific issues that tenants and residents have with their landlords, such as repairs and antisocial behaviour. Though these issues are unlikely to be explicitly referenced in the Together with Tenants Charter, we anticipate that they would be covered under the commitments around 'quality services' and 'receiving support when things go wrong'. The feedback also provides a useful insight into how and where relationships between tenants, residents and housing associations can be improved.

We understand from the feedback how important it is that the plan delivers meaningful change. Many people commented that board ownership and leadership will be key to this, alongside monitoring take up of the plan, and tenant and resident oversight and reporting of the charter. A similarly important message that came through clearly is the need for the charter to be linked to regulation and have effective compliance mechanisms.

We were encouraged by the level of engagement in the consultation from small, supported and specialist housing associations. We will work with these providers – including through the early adopters – to ensure the plan and charter are relevant, useful and applicable for our diverse membership.

Another issue is the need to ensure the plan allows housing associations the space to build on their existing services and ways of working, while also driving change where it is necessary and ensuring tenants and residents, regardless of tenure and where they live, have a more consistent experience.

We know tenants, residents and housing associations may want to agree specific standards or ways of working that are unique to their own context, including more ambitious targets on the commitments in the charter where relevant. With this in mind, we will work closely with the Tenant Advisory Panel and Member Steering Group to work through how we can get this balance right and test it with the early adopters.

4. The Together with Tenants Charter

It is encouraging that 87% of respondents agree the charter covers the right issues. However, concerns were raised in the commentary of the survey responses and at the consultation events about the language and scope of the charter which we want to address through changes.

We are discussing the scope of the charter and any additional commitments we think should be included with the Tenant Advisory Panel and Member Steering Group. A full summary of the issues that were suggested is provided in the consultation feedback document that accompanies this paper.

Another area where we intend to make changes to the charter is the language. What came out clearly in the consultation was the need for a move towards working ‘in partnership’ with tenants and residents, and to build trust in these relationships. We intend to work with the Tenant Advisory Panel and Member Steering Group to reflect that in the language of the commitments.

As with other questions, we received feedback on some specific topics including standards on repairs, tenancy agreements, allocations and Right to Buy. While we don’t anticipate the charter will include targets on particular issues – as we think these should be agreed locally between housing associations and tenants and residents – this is valuable feedback for us to understand the environment in which the charter is going to operate. We will seek the guidance of the Tenant Advisory Panel and Member Steering Group as to how to use this feedback in the broader context of the plan.

Another key theme was around the need for clarity on how the charter commitments will sit within the regulatory framework, without duplicating, diminishing or bypassing existing standards. The link between the charter and the regulatory framework is picked up later in this document.

We will discuss any suggestions for extending the scope of the charter with the Tenant Advisory Panel and Member Steering Group, and test with the early adopters how performance against the charter can be monitored and what will happen if the commitments are not met. There is more detail about this later in this document.

4.1 Where can we make improvements?

More than 300 respondents made suggestions for improvements that could be made to the charter.

In summary, these included additional commitments around:

- Clear communication and ensuring a variety of methods so that information is provided in clear and accessible ways.
- Customer service and the importance of treating tenants and residents with courtesy and respect, including themes like ‘getting it right first time’ and being accountable when things go wrong.
- Promoting diversity and inclusion by ensuring tenants and residents are offered appropriate support to engage with opportunities at their housing association.

There were also suggestions about how the charter should be implemented and embedded in organisations to ensure it has maximum impact, which included:

- Ensuring a range of voices are heard by reviewing traditional methods of tenant and resident scrutiny to capture the views of the broader tenant and resident base and wider customer insight.
- Opportunities for tenant and resident involvement in co-designing services and making decisions in partnership with their housing association.
- Making sure the language used is clear and precise, and that we avoid jargon.
- Making clear that genuine partnership working between tenants, residents and housing associations is fundamental to any new approach.

We will work closely with the Tenant Advisory Panel and Member Steering Group to make sure we take this feedback into account when we revise the charter and consider what guidance and expectations need to be in place to support implementation.

5. Tenant and resident oversight and reporting

A significant majority of respondents (96%) agreed that tenants and residents should have a role in publicly reporting on the performance of their housing association against the charter. We will work with the Tenant Advisory Panel and Member Steering Group to agree how to implement this aspect of the plan, and will test what effective arrangements look like through the early adopter process.

Of the small number of respondents who disagreed that tenants and residents should play a role in monitoring and publicly reporting on performance, some commented that scrutiny panels are already facilitating tenant and resident oversight. This is encouraging in terms of understanding the base from which some housing associations will be starting, but this approach is not universal across the sector.

Through Together with Tenants, we aim to set a clear expectation that tenant and resident oversight will take place in some form in every housing association, and that the sector overall will be open to more scrutiny. An important part of the early adopter process will be to explore different methods for achieving this. Formal scrutiny panels may be one mechanism that could be used to report performance against the charter, and we will also capture alternative methods of tenant and resident oversight and reporting.

In response to concerns raised by a small number of housing associations, we will make it clear that Together with Tenants is not a new iteration of old methods for tenant and resident scrutiny. Instead, it is intended to develop new and innovative ways to build relationships of oversight and accountability between tenants, residents and housing associations.

When we asked a more detailed question about how tenant and resident oversight could work in practice, we received almost 600 individual responses.

Reflecting this we need to make changes that strike a balance between providing meaningful oversight and being clear what good looks like – without being too limiting or prescriptive about how this is achieved – to ensure we can incorporate the different ways of working that already exist in housing associations.

Some of these responses were based around a need to generally improve the communication between tenants, residents and housing associations, which is useful insight we can feed into the plan and implementation. Other responses proposed more stretching objectives and ways of working that might be new for some housing associations. These suggestions were largely based around forming new groups and boards, and building better interpersonal relationships between tenants, residents and housing association staff. The need for tenant and resident groups to be diverse and representative was also clearly set out.

A challenge that was presented in the consultation feedback is the need to balance transparent and meaningful impact measurement – with clear metrics for assessing performance – against the risk that the charter could become a ‘tick-box exercise’ for some organisations, without delivering any changes or innovative ways of working. This is another area on which we will need to hold discussions with the Tenant Advisory Panel and Member Steering Group and test out as part of the early adopter process.

6. Linking oversight with regulation

A frequent comment from tenants and residents was made around how oversight will link to regulation and the powers that tenants and residents will have. We also received comments on how tenants and residents will be equipped with the resources, skills and tools to hold their housing association effectively. This is something we will explore with the early adopters.

There is clearly more work to do on how tenant and resident oversight and reporting of the commitments in the charter should link to regulation. The Federation has already indicated strong support for strengthened consumer regulation and it is important that the Together with Tenants plan complements any new arrangements. We will continue talking to the Regulator of Social Housing and the Government about this important issue, as well as talking to the Tenant Advisory Panel and Member Steering Group about what they would like to see from this.

The need for both representative data that shows a wide picture of performance, and the need to take seriously the concerns of individual tenants and residents, was also clear from the feedback. We will consider the role of data and information in demonstrating the impact of the Together with Tenants plan and performance against the charter, but again anticipate that this may be about setting expectations rather than being prescriptive about what every organisation should do. We will also need to consider any developments on the back of the Social Housing Green Paper, in which the Government proposed a set of key performance indicators that could be collected and reported consistently across the social housing sector.

7. Next steps

We will present the consultation feedback as a whole to the Tenant Advisory Panel and Member Steering Group on 4 July, and will discuss and agree and changes we need to make to the plan and charter, and how it should be implemented.

Changes to the plan and the charter will be published in July, and we will then work with the early adopters to support them to implement and test it within their own organisations.

We will publish updates and progress reports as they emerge, working with the Tenant Advisory Panel, Member Steering Group and the early adopters.