

# Together with Tenants

Responses to the consultation, February – April 2019

## 1. Summary of key points:

---

- More than 2,500 responses were received to the online consultation, with more than 500 people attending consultation events.
- Most (77%) of the online responses were from housing association tenants and residents.
- Responses were generally favourable to the approach.
- A wealth of feedback was received which will help to shape the further development and next steps of the Together with Tenants plan.

## 2. Introduction

---

The [Together with Tenants draft plan](#) was put out for consultation from 20 February until 19 April 2019. The draft plan contained four proposed actions:

1. **A new requirement in the National Housing Federation Code of Governance** for boards to be accountable to their tenants and residents.
2. **A new Together with Tenants Charter** setting out what tenants and residents can expect from their housing association landlord.
3. **Tenant and resident oversight and scrutiny** of the charter, with a report on how their landlord is doing against the charter commitments.
4. **A closer link with regulation.**

The purpose of the consultation was to gather views from a wide range of interested parties – most importantly from tenants and residents.

There were three main ways in which responses could be given:

- an online questionnaire
- submitting a response via email
- attending an event.

The views gathered through this exercise are intended to further shape the draft plan before it is tested by a group of [early adopter housing associations](#).

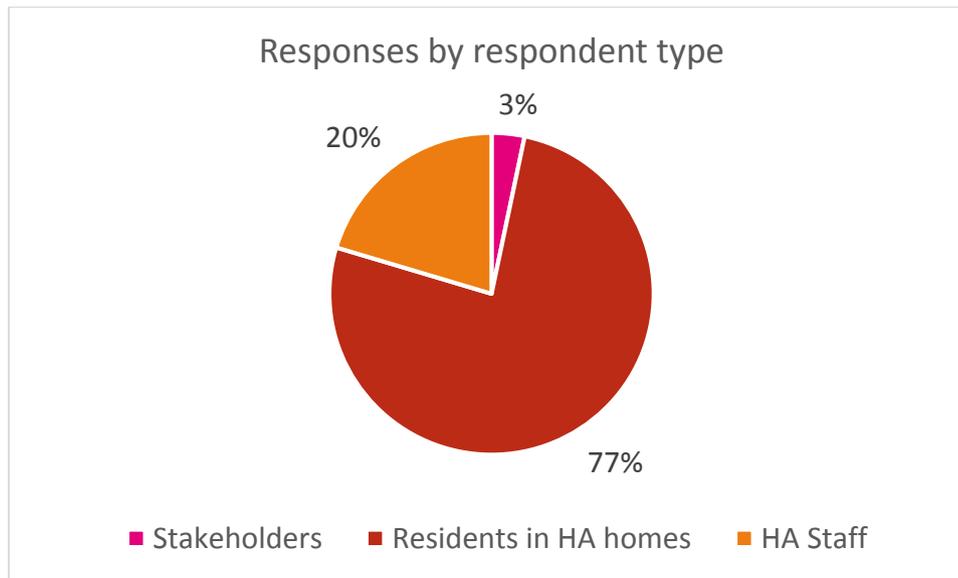
[Read the draft four-point plan](#) (version at 19 April 2019)

Please note that this document is a summary of the consultation responses as a whole. The Federation has responded to explain how it intends to take this feedback forward. [You can read the response here](#).

### 3. Response rates

---

We received more than 2,500 responses to the online questionnaire. More than three quarters of these came from housing association tenants and residents.



In addition to this, we received about 60 responses by email and more than 500 people attended a variety of consultation events. It should be noted that a proportion of the responses submitted by 'HA [housing association] staff' include the findings from tenant engagement events run by individual housing associations. These were kept as 'HA staff' responses as they had been summarised and submitted by members of housing association staff.

### 4. Responses

---

The online questionnaire consisted of 15 questions. These were a mixture of yes/no and open text questions – some of which were context dependent (i.e. they were only asked if a respondent answered a particular way to a yes/no question), while others were asked of all respondents. The questions fell broadly into three categories:

- questions about the four actions in the draft plan
- questions about the charter
- questions about tenant and resident oversight and reporting.

A final question asked if there was anything we had not covered, or anything else the respondent wished to add.

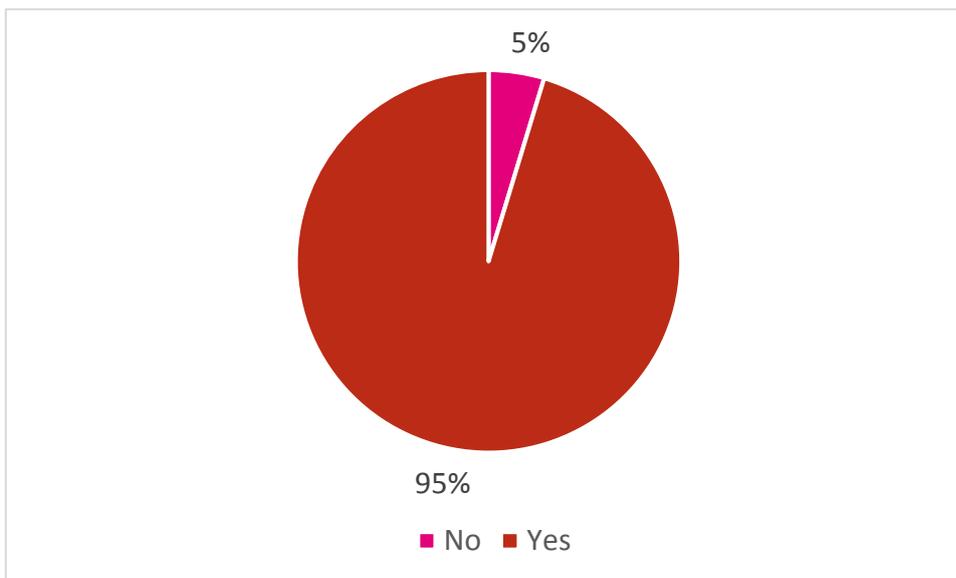
In this report we will deal with each category in turn, finishing with the 'anything else?' question. Within each section we will address each question individually, drawing together the specific responses received via the questionnaire, email, and feedback from the events.

It is worth noting that, on the whole, the engagement events raised the same concerns as the other forms of response, and where additional points were made we have included these.

#### 4.1 The draft four-point plan

---

**Do you think the four actions outlined in the draft plan are the right actions?**



This indicates broad support for the actions outlined in the draft plan.

#### **Please let us know if you have any further comments on the actions**

Over 400 respondents gave further comments on the actions. Generally, these were positive, with around a quarter of the responses expressing general support for some or all of the actions. Many also expressed general support for the ambition to improve tenant and resident involvement, or commented about the importance of tenants and residents being involved in decision-making.

Many tenants and residents responded about specific issues they had experienced with their landlord. For the most part these referred to repairs and maintenance issues with the property, complaints processes, poor customer service, lack of communication and not feeling listened to. Some tenants and residents added that repairs should be explicitly mentioned in the actions, for instance through setting a minimum expectation of repairs standards.

Many responses highlighted the challenges with implementing the actions. Some commented that similar proposals had happened in the past but had failed to result in meaningful change. One respondent raised the risk of time and energy being spent on process rather than practical action.

Some smaller housing associations highlighted the different challenges faced by small and large associations: smaller ones may have closer local engagement, but may struggle with resourcing to adapt and evidence tenant and resident involvement.

Tenants, residents and housing association representatives queried how housing associations' adherence to the charter could be monitored. Some raised the need for specific measurable outcomes, or requested that the actions are clearer on what this would look like in practice. Some said there was a risk that the actions could be seen as a 'tick-box exercise'.

Tenants, residents and housing association representatives highlighted that the actions would need 'teeth' in order to be effective, such as penalties for associations that fail to meet the charter's standards. Proposals included fines, giving the regulator further powers to intervene, or introducing an independent body (perhaps led by tenants and residents) that could enforce compliance.

A number of respondents queried the wording proposed for the Federation's Code of Governance of 'as accountable as possible', stating that it is vague and subjective. Some argued that 'as possible' should be removed, and further detail on what accountability means in practice should be included within the code.

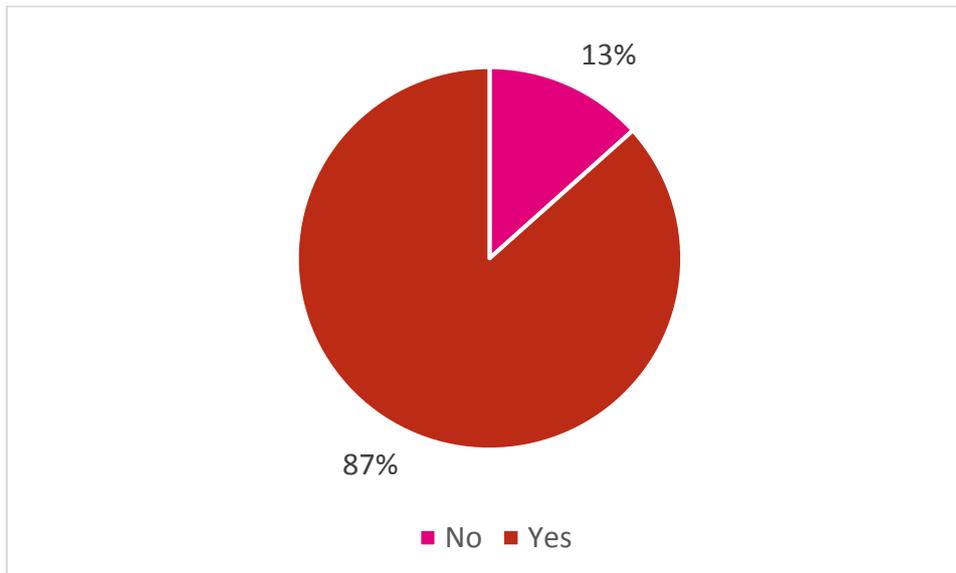
Many housing associations gave information about their existing tenant and resident involvement processes and discussed how these meet the expectations described in the plan, or how the actions provided impetus to consider what they could do better. Some highlighted the need for flexibility about how the actions in the plan are delivered at a local level, recognising the different size and service offers of housing associations. One organisation, that provides only care and supported housing, queried how it might appropriately implement it, given the specific needs of its client group. There was a recognition overall that housing associations are starting from very different places with regard to this work.

Tenants, residents and housing association representatives raised concerns about the clarity and accessibility of information regarding the development and implementation of the charter. Some asked how tenants and residents could be kept informed of the progress of implementation. Some commented that not all residents have access to the internet so may struggle to access online information.

## 4.2 The Together with Tenants Charter

---

### Does the Together with Tenants Charter cover the right issues?



This is an encouraging response, indicating that the charter is generally on the right track.

#### **If no, please tell us what we've missed**

Over 150 of those who answered 'no' in the survey gave further information.

Repairs was a commonly cited issue, especially regarding the quality and speed of works, minimum standards, and the complaints and escalation process. Many responses also highlighted issues with individual housing associations, in particular relating to particular policies the respondent disagrees with, or specific areas of service such as parking. A number of tenants and residents pointed to the two-way nature of rights and responsibilities and suggested that this should be recognised in the charter. Many also requested that housing associations take more active enforcement against antisocial behaviour.

Suggestions about how the charter might be implemented, monitored, and enforced, were raised by tenants, residents and associations. These included more tenant and resident board members or other scrutiny of boards and giving tenants and residents powers to enforce actions, and including meaningful sanctions for failure.

A number of tenants, residents and housing associations raised concerns that some of the commitments in the charter duplicate existing regulatory standards or tenancy agreements, and could be an additional confusing layer for tenants, residents and staff to negotiate. Many suggested that the commitments were thus streamlined into a shorter, clearer document that clearly states the expectations being set, beyond the minimum of regulatory requirements.

Some respondents emphasised the importance of having the flexibility to design a locally determined approach rather than a 'one-size-fits-all' approach.

Other issues that a small number of respondents requested be added to the charter were:

- affordability and value for money of rents and service charges
- open forums or local groups
- tackling stigma
- tenant and resident scrutiny over contracts and contractors' performance.

Clarity over whether the charter applies to leaseholders and shared owners as well as renters was also requested by some respondents.

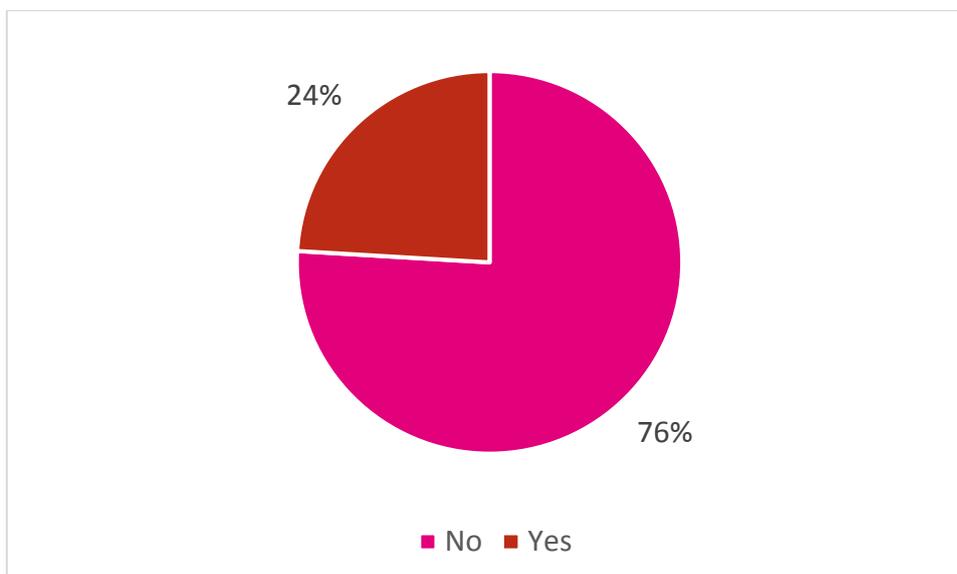
Of those who sent in written responses via email, most agreed that the charter covered the right issues. Some specified it was a minimum standard and that their housing association is already delivering a more ambitious approach.

Many raised concerns about the implementation of the charter, the vague nature of some of the wording, and that it should not become a tick-box exercise or result in a process-over-outcome approach.

A small number expressed concerns that the costs and resourcing of implementing the charter could be burdensome, especially for smaller associations. One housing association respondent also pointed out that large associations might struggle with offering 'unofficial channels' of contact, especially as they have been deliberately moving towards defined systems of contact to permit better performance reporting.

Some tenants and residents also expressed concerns that the additional responsibility could be onerous on tenants and residents that are already involved with their association.

**Is there anything missing from the charter that residents have a right to expect from their housing association?**



The responses to this question demonstrate support for the issues set out in the charter but also suggest there are other areas that the Federation should look at closely.

**If yes, please tell us what we've missed**

Over 300 survey respondents suggested additional issues they thought should be covered by the charter, and we also received almost 50 responses via email.

Communication was the most commonly referenced theme. This included tenants and residents being kept informed of actions and maintenance schedules, having a range of points of contact (online, phone and face-to-face), responding to queries and complaints within a reasonable timeframe, and providing information about the setting of rents and service charges. One association recommended its approach of always informing tenants and residents when they will hear back about a question or complaint.

Repairs were frequently referred to. Many tenants and residents pressed the importance of getting quality repairs done, on time, the first time round. Some also raised the issue of planned maintenance and better consistency across the stock, as part of publicised scheduled works programmes.

Customer service was also a key issue, with many tenants and residents highlighting the importance of being treated with respect and honesty, as paying customers.

A substantial minority of tenants and residents also responded to this question by raising concerns about their housing association's approach in certain service areas, such as tenancy agreements, allocations, or decorations.

Some respondents questioned when or whether they would be offered the Right to Buy.

Many respondents made comments about wanting more opportunities to be involved in decision-making, co-design services and strategies, and to collectively exercise control.

As noted in the previous sections, many respondents also commented that the charter should include details of the consequences for landlords who fail to implement it, or do not meet the agreed expectations.

A number of respondents raised equality and diversity issues, such as ensuring that all tenants and residents can get involved with their association and are offered support if they so require. One respondent requested that supported housing should be mentioned and how the charter might work for tenants and residents with severe physical and learning disabilities.

A small number of responses commented that the charter should include details of the tenant's or resident's responsibility as well as the landlord's, as part of a two-way relationship.

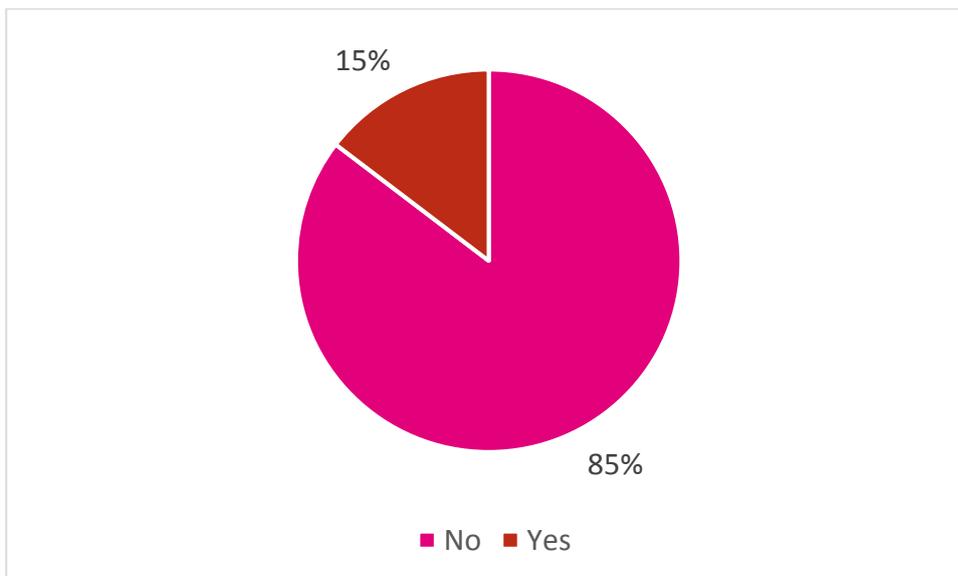
Some respondents pointed to the potential inclusion of specific commitments around health and safety and Value for Money.

Of those that submitted written responses via email (mostly housing associations and tenant or resident groups), several pointed to the importance of clarifying the relationship between the charter commitments and regulatory standards.

Several also suggested that commitment 3 ('Every tenant and resident has the right to be listened to and have their view heard on decisions that affect their community, home and the services they receive') should relate not only to the right to be heard, but also the right to receive feedback on whether or how their view has influenced their landlord's direction.

Additionally, a number of responses (mostly from housing associations) pointed out that participants in traditional scrutiny approaches are not always representative of the broader tenant and resident base, and said the importance of wider customer insight and real-time feedback should be acknowledged in the charter.

**Do you have any suggestions for how the wording of the charter could be improved or made clearer?**



This indicates a broad level of agreement with the wording as it is. However, the detailed comments raise some important issues.

**If yes, please tell us**

We received almost 200 survey responses and around 50 written responses in relation to this question.

The most common response by far was that the charter should be written in plainer English (or that an easy read version should be available). Some mentioned the use of jargon or terms that only housing association employees would be familiar with, and one respondent recommended that the wording should be signed off by the Tenant Advisory Panel. Some recommended that a glossary should be included.

Responses also suggested large print, braille, audio, video and infographic versions, and one also suggested the document should be available in other languages.

A few associations requested that the charter should be taken as a framework within which local versions can be customised. One respondent suggested that an example 'local offer' version should be attached.

A number of respondents stated that the wording of the charter is repetitive, and that several of the commitments could be combined to make the document shorter and more concise.

In terms of the specific wording, the term 'expectations' drew concerns from both housing associations and tenants and residents, who suggested that 'reasonable' be added to reflect that not all expectations are realistic or appropriate. Two associations pointed out that 'community' is a broad term and not something landlords may always have much influence over.

One housing association said that 'decent' was not aspirational enough and that the wording should be 'a good quality, safe, and well managed home'. Several comments also referred to the term 'right', which they said implies an enforceable legal standard and may mislead residents about what the charter is. A couple of associations questioned the use of 'support and advice', suggesting that 'support' is unclear and 'advice and signposting' may be more appropriate.

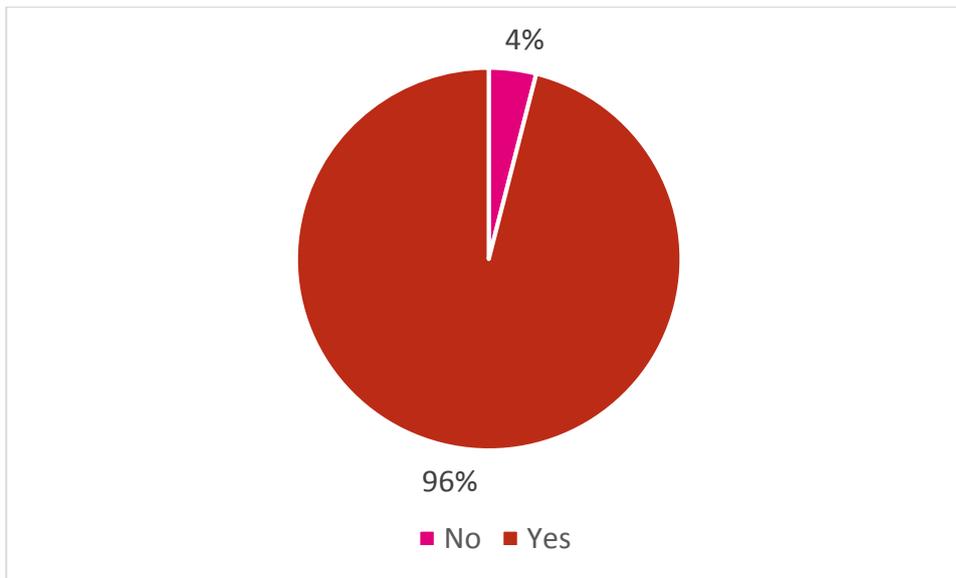
Some respondents criticised the tone, which was described as 'old-fashioned', 'paternalistic' and 'confrontational'. Several of these also emphasised that the charter should clarify that the relationship is two-way. There was feedback from some of the engagement events that the language could be more active.

Lastly, several respondents disputed the use of the terms 'tenants', 'residents', and 'customers'. Three preferred 'tenants', four preferred 'residents', and one housing association preferred 'customer'.

Some queried again whether leaseholders are included and stated that the terms should at least be defined clearly.

### 4.3 Oversight

**Do you agree that tenants and residents should have a role in reporting on housing associations' performance against the charter?**



This demonstrates that there is clear and significant support for the role of tenants and residents in reporting on housing associations' performance against the charter.

#### **If no, please tell us why**

Very few respondents opposed giving tenants and residents a role in reporting on housing associations' performance. About a quarter of these responses did not give specific answers to the question (such as 'not sure', stating that tenants and residents should have a role, or not explaining why they disagree).

Of the remainder, the most common response was that it is unnecessary. Some commented that scrutiny panels already fulfil this function, while others pointed to the existing use of performance measures. Some pointed out the risk that this is likely to be dominated by dissatisfied tenants and residents rather than a representative spread of all tenants and residents. A couple of tenants and residents pointed out that housing association staff are paid to monitor and analyse performance and this should not be the responsibility of tenants and residents.

A small number of housing association representatives suggested that implementing these measures could be administratively and financially burdensome, with little measurable benefit.

#### **Do you have any suggestions for how this reporting role could work well in practice?**

We received almost 600 responses to this question through the online survey and emails.

Around 70 responses specifically referred to surveys or feedback forms; either annual/bi-annual or in 'real-time' (as in satisfaction surveys after a service has been delivered). Several of these comments

specified that the survey should either be conducted or audited independently, and others added that it should be anonymous.

Many tenants and residents pointed to a general desire to improve communication between landlords and tenants and residents, such as dedicated phone lines or emails for feedback, liaison officers, staff listening to residents more, residents being kept informed, and using a range of communication methods to meet varying needs.

Over 50 responses referred to scrutiny or resident panels which would review evidence or report to the board. Some suggested these should be recruited on a geographical basis (e.g. estate level or regional level), while a small number suggested they should be broken down by service area.

Many respondents suggested they would like more opportunity to meet and speak to their landlord's representatives, in person, in their local area.

Another popular suggestion was that local tenant and resident groups or associations could represent their community and meet with their housing association's representatives on a regular basis. Many respondents highlighted the importance of such groups being independent.

A substantial number of responses specifically requested that residents be consulted online: through surveys but also through online forums. However, some also argued that online services should be avoided as not all residents are able to access them.

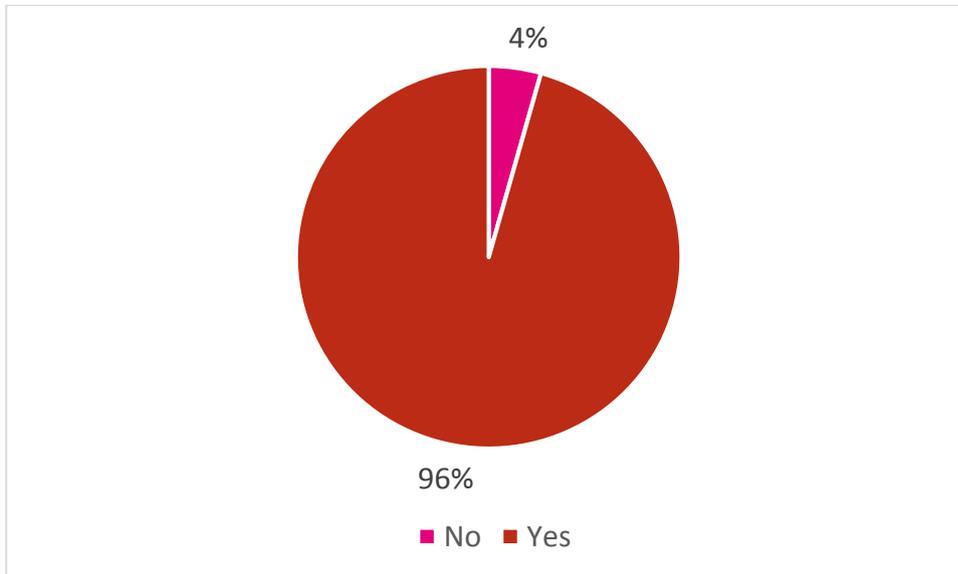
Many responses highlighted the difficulties in reaching a broad, representative group of tenants and residents, rather than just a small group of engaged tenants and residents, or 'the usual suspects'. Some landlords pointed to the difficulty of recruiting diverse and representative participants.

Respondents also highlighted the importance of clear metrics relating to customer service and quality, standardised and statistically valid approaches to reporting. Several referred to existing measures in the Star survey, which is used by several hundred associations already. Some said tenants and residents should feed back with reports to the association or its board. Others questioned how the charter could be implemented in practice or highlighted the risk of becoming 'bogged down in process'.

Other approaches that were recommended by a small number of respondents include using existing involvement structures, having residents on boards, and having support and training available for residents wishing to become more involved. A few respondents, largely housing associations, also highlighted the importance of flexibility in how the charter is developed, either to account for different organisational structures or to permit co-creation of the approach with their own tenants and residents.

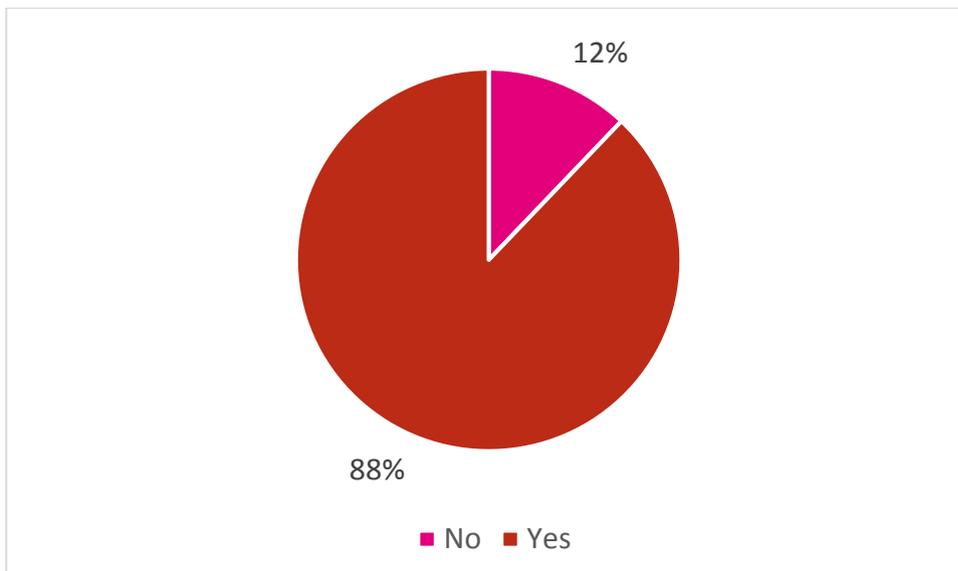
Individual suggestions for the National Housing Federation included a facilitated 'communication week' for tenants and residents to feed back on the charter's impact, a process for tenants and residents to complain to the Federation about their landlord, and Federation membership for tenant and resident groups.

**Do you agree that tenant and resident oversight of the charter should have a role in regulation, including providing evidence to the Regulator of Social Housing where relevant?**



This demonstrates widespread support for the link between tenant and resident oversight and regulation.

**Do you think this role should be strengthened?**



This shows broad support for a stronger link between tenant and resident oversight and regulation.

**Do you have any further comments or suggestions on linking tenant and resident oversight of performance to regulation?**

We received around 400 responses to this question.

Many respondents expressed support for linking oversight and regulation and the charter more broadly.

Many highlighted the importance of clear lines of communication and regular contact, including regular contact between landlords, tenants and residents (especially face-to-face), and requested clear explanations on how the oversight will link to regulation and what powers tenants and residents have.

Around 20 survey respondents pointed to the issue of inclusion of particular social groups, and the importance of representative panels across age, gender, ethnicity, and disability status. A small number of housing associations also pointed out that the majority of tenants and residents do not want to be formally engaged and that involvement had to take proper account of this silent majority.

Unsurprisingly, given the complex nature of regulation, a number of respondents highlighted the need for tenants and residents to be properly supported and offered training to understand performance reporting and regulation. Some (almost all of which were landlords) pointed to existing structures that could be used as part of this process, such as scrutiny panels, or adding additional measures to the existing regulatory returns. Several respondents suggested that in-depth assessments (IDAs) could be used.

Some respondents (mostly tenants and residents) suggested that tenants and residents should be paid or formally employed, in recognition of the demands of involvement and the need to have a solid understanding of the issues.

Several housing associations (some following their own resident consultation exercises) pointed to the relatively weak powers of the regulator and suggested that these should be strengthened and the regulator made more proactive in enforcement. Some requested that the National Housing Federation should lobby for broadened powers. This could include lowering the 'serious detriment' bar for intervention to allow them to investigate broader service failures, further resourcing, or more stringent consumer standards. One respondent pointed out that it would be necessary for the regulator to determine this, and it will be essential during the early adopter process to be clear with tenants and residents and their landlords about what the sector can and cannot do independently.

A few respondents pointed out that an oversight link to regulation would be essential for the charter to work, as otherwise there would be no 'teeth' to ensure compliance.

Several respondents highlighted that tenants and residents would need a direct method of contacting the regulator if they have an issue with their landlord, or that the regulator should engage with tenant and resident groups as well as landlords.

The importance of balance between representative data and engaged tenants' and residents' concerns was raised by both associations and residents. One association pointed to the importance of 'comparing apples with apples', and that organisations with very good engagement mechanisms could risk being scrutinised by the regulator because their tenants and residents have higher expectations.

Flexibility on how the charter is implemented was also highlighted by many respondents, reflecting the diversity of the housing association sector and its tenant and resident bases.

Of the few responses that outright opposed linking oversight with regulation, two worried that this would prevent strengthened regulation, two worried that league tables were a blunt and unrepresentative instrument, two said that there were already sufficient mechanisms, one commented that it would distract from service delivery, and the remainder did not explain.

One supported housing provider expressed concerns about how its tenants and residents could meaningfully engage with the regulator, on a fair basis with other associations.

A few small providers suggested that the existing co-regulation approach was appropriate and that boards should self-assess to prevent burdensome additional requirements. Some suggested that self-assessments should be used but with a dispute process available for tenants and residents.

#### 4.4 Other issues

---

##### **Is there anything we've missed? Or do you have any further comments?**

We received almost 300 responses to this question (excluding those who responded with 'no').

Many expressed general approval for the draft plan and charter, with some commenting that they enjoyed the opportunity to give their views.

Some respondents added that they hoped this would finally result in an improvement of their experience. A few said that they were looking forward to the opportunity to feed back more as the process goes on.

Many also made critical comments about specific issues they are experiencing with their own housing association. Many of these related to poor customer service, feeling ignored, or repairs and maintenance problems.

Many tenants and residents again pointed to the importance of communication: being kept updated and having a face to talk to.

Some added that the charter and its progress should be widely publicised and queried how the Federation would ensure all residents knew about it.

A small number made comments about the importance of ensuring all groups can be involved (including disabled tenants and residents and those without internet access).

The importance of mutual respect was also raised by a number of respondents.

Some respondents also queried the implementation of the plan and charter, and whether it would result in real change. Again, many of these pointed to the need for 'teeth' and enforcement of compliance. Many also pointed broadly to the need for accountability and more positive co-operation between tenants, residents and landlords. Some questioned what the timeframe for implementation of the charter would be.

A few respondents commented that they are very happy with their association and the level of engagement on offer already.

A small group of respondents added that they would like more local control over who is allocated into housing association properties. As in previous questions, several respondents questioned if and when they would be offered Right to Buy on their property.

Tenants, residents and housing associations also suggested that examples of best practice would be useful to help them understand how the charter might be implemented. Some associations offered to share their own best practice knowledge with the National Housing Federation.

Other suggestions for what could be covered in the plan included:

- 'scores on the doors' for housing associations
- a standardised complaints procedure used by all National Housing Federation members
- stating that contractors are also covered under the charter
- National Housing Federation compiling and publishing a list of adopters
- advice and guidance on safety standards and measures for homes, as well as templates for housing associations to publish information on fire safety and fire risk assessments.

Written responses submitted via email (mostly from associations, although including some residents' groups) pointed to the following issues:

- giving broader powers to the regulator, especially concerning health and safety issues
- being careful that the charter does not duplicate the regulatory standards
- ensuring that involved residents (including the National Tenant Voice) are independent and representative, and consider the views of all residents rather than just vocal unsatisfied ones
- making the charter more practical, as a useful framework from which to design services rather than aspirations
- concerns that implementing the charter could be resource-intensive and draw financial resources away from other service areas.

A theme which emerged from several of the engagement events was the important role of boards in setting the culture of housing associations, and that their involvement and commitment to this work is fundamental to its success.