



The Scottish Social Housing Charter

A Consultation

Response from the

Tenants Information Service

1.0 Introduction

- 1.1 TIS welcomes the opportunity to respond to the Scottish Government's Scottish Social Housing Charter (SSHC) Consultation Paper. TIS has been working closely with tenants, landlords and the Scottish Government to share views and ideas on how to develop the final Charter. During the consultation period, TIS consulted with its members and tenants organisations throughout Scotland. TIS has also consulted "hard to reach" groups including homeless people, supported housing tenants, young people and minority ethnic groups and separate consultation reports have been submitted to the Scottish Government regarding this consultation. TIS is represented on the Scottish Government's Charter Sounding Board along with other key partners with a keen interest in developing a final Charter that is fit for purpose.
- 1.2 TIS is the leading organisation promoting and inspiring innovative tenant participation practice in Scotland. TIS practitioners provide high quality independent advice, training and support services which empower tenants, local communities and landlords to exchange information, develop good practice and influence change.
- 1.3 For more information on the contents of this response please contact:

Ilene Campbell
Director
Tenants Information Service
Suite 128
Baltic Chambers
50 Wellington Street
Glasgow
G2 6HJ

0141 248 1242

icampbell@tis.org.uk

2.0 Summary

- 2.1 TIS believes that the intention of introducing a SSHC for the social housing sector in Scotland is well placed in the drive to increase the quality of services delivered by social landlords and for them to be accountable to their tenants.
- 2.2 To be effective the Charter outcomes require to be meaningful and measurable. Currently many of the outcomes are very broad, ambiguous and too narrowly focused on tenant satisfaction, that assessing compliance would be very difficult for the Scottish Housing Regulator.
- 2.3 While tenant satisfaction is an important factor, having outcomes that focus on tenants being satisfied is subjective and difficult to measure. While we believe that there is an important place for the measurement of tenant satisfaction in relation to how well a landlord is performing, satisfaction is not an outcome in its own right.
- 2.4 We have not used the Scottish Government's consultation questionnaire to construct our response. We recommend that additional work is undertaken to redraft and refocus the Charter outcomes to ensure they are clear, meaningful and measurable. That the outcomes are redrafted to move away from a focus on "tenant satisfaction" to outline what tenants can expect and what standards landlords should be delivering.
- 2.5 TIS has not suggested rewording for specific SSHC outcomes. However we consider that the CIH's suggestions for amendments are closely aligned with the wishes of tenants' representatives and their organisations to ensure that the performance of landlords will improve or that tenants' representatives will have a central role in scrutiny in the way that is intended by the Housing (Scotland) Act 2010 and the current consultation by the new Scottish Housing Regulator.
- 2.6 We recommend that when the Charter has been revised following this consultation period that the Scottish Government gives further opportunities for key stakeholders to comment, at the very least within the Sounding Board meetings, but also more widely with key organisations such as ourselves, TPAS, CIH, SFHA, Shelter, ALACHO, Equality and Human Rights Commission, GWSF, Scottish Disability Equality Forum and COSLA as well as the regional networks of tenants organisations.
- 2.7 It is vitally important that the Scottish Government invests time and resources in compiling a final Charter which is meaningful, achievable and realistic within the current housing policy framework in Scotland. Landlords and tenants must develop opportunities to work effectively in partnership to set local standards and develop ways to review performance. This must include a commitment to resources, support and training for tenants and their

organisations as well as for staff and members of governing bodies to fully participate in the implementation of the first Scottish Social Housing Charter and the successful achievement of meaningful outcomes.

3.0 The Scottish Social Housing Charter Outcomes

3.1 We believe that the intention of introducing a SSHC for the social housing sector in Scotland is well placed in the drive to increase the quality of services delivered by social landlords and for them to be accountable to their tenants. Tenants have a legal responsibility to pay rent for the services they receive and in return expect to be treated equally with due respect and receive services which are of a good quality and enshrined with the principles of good customer care and communication.

3.2 However, through the activities we have undertaken during the consultation period many concerns from both tenants and landlords have been raised about the SSHC in its current format. In order to be effective the Charter outcomes must be meaningful and measurable. Currently many of the outcomes are very broad, vague and too narrowly focused on tenant satisfaction, that assessing compliance would be very difficult for the Scottish Housing Regulator. While tenant satisfaction is an important factor, having outcomes which focus on tenants being satisfied is subjective and difficult to measure. We have found that landlords and tenants share concerns about how tenant satisfaction can be measured objectively and meaningfully. There are all the traditional issues associated with tenant satisfaction surveys which will also be relevant to the current outcomes such as the cost, the response rates and how useful the feedback received is to landlords in measuring tenant satisfaction. There is a widely shared view that the satisfaction of many tenants will be influenced by their individual and personal circumstances in their dealings with their landlord's staff. We would therefore recommend that outcomes which focus on "tenant satisfaction" are refocused to outcomes which are clear on what tenants can expect and standards expected of landlords.

3.3 While we do believe that there is an important place for the measurement of tenant satisfaction in relation to how well a landlord is performing we believe that it is more important that tenants' views about the quality of the services they receive are measured, rather than their satisfaction with the services. It would be more valuable for tenants to be able to rate their services in a similar way to the Scottish Housing Regulator, for example, using the range of terms from "Excellent" to "Unsatisfactory" rather than to simply express their satisfaction or dissatisfaction. If tenants' views were collected in this way then it may be more straightforward to agree standardised measures for benchmarking between landlords which would make the information

accessible for tenants and other customers or organisations interested in comparing performance.

- 3.4 TIS believes that development work could be done with tenants' organisations and landlords at a national level to develop this framework for assessment of tenants' views and experiences which would then be more closely aligned to the new Scottish Housing Regulator's proposed performance monitoring framework. This would make the focus of tenant involvement in assessing their landlord's performance more streamlined, co-ordinated and uniform within Scotland, therefore the benchmarking comparisons between landlords could be more easily made. This would also appear to make the Scottish Government's intention of the SSHC improving landlord services and tenants' being empowered to hold their landlords' to account more realistic and achievable.
- 3.5 TIS has not suggested rewording for specific SSHC outcomes. However we are aware of both the Chartered Institute of Housing's (CIH) and the Scottish Federation of Housing Association's (SFHA) responses and their efforts to suggest a format for the Charter which is more realistic and practical. While we understand the SFHA's proposal to reduce the Housing Charter to one page we consider this would not be feasible to ensure the key principles around the quality of housing services and standards are maintained. We consider that the CIH's response is closely aligned with the wishes of tenants' representatives and their organisations to ensure that the performance of landlords will improve or that tenants' representatives will have a central role in scrutiny in the way that is intended by the Housing (Scotland) Act 2010 and the current consultation by the new Scottish Housing Regulator.

4.0 Implementing the Scottish Social Housing Charter

- 4.1 During the consultation period many concerns were raised about the resources that will be required for both tenants and their organisations and landlords to implement the SSHC and meet its outcomes successfully.
- 4.2 Tenants are concerned about the additional workload which will be placed on a traditionally small pool of volunteers to become involved in self assessment and performance monitoring of landlord services. They are concerned that the level of development support required to increase their capacity to become involved at the level required will not be adequately resourced by their landlords. It is clear that there will be no additional funding available from the Scottish Government to resource this support. Tenants who actively participate with their landlords at the moment have concerns that the focus of their participation will become about meeting the requirements of their landlords for self assessment rather than about issues that are important to tenants.

- 4.3 Landlord staff have expressed concerns to TIS about their current level of tenant participation activities and how they can improve these over the next year in order to prepare for self assessment. They have very real concerns about their ability to increase the pool of tenants involved and to support the capacity of these tenants to participate in scrutiny activities when in some cases they have so few tenants currently involved. There are concerns that the expectations of the new Scottish Housing Regulator for the level of tenant involvement in scrutiny activities is unrealistic and will not be achieved for a number of years. Despite ten years since the introduction of the Housing (Scotland) Act 2001 and its tenant participation requirements, levels of tenant involvement vary greatly throughout the country. As a result this poses great challenges for achieving good tenant participation levels in assessing the achievement of the SSHC outcomes.
- 4.4 We believe that evidence from England suggests that tenants can get effectively involved in scrutiny activities with their landlord and increase their participation when these activities are properly resourced. There has to be a culture within a landlord organisation that demonstrates there is a commitment to tenant participation activities and puts tenants at the heart of decision making. It is essential that tenants involved in the regulatory process have the relevant training, skills and knowledge to participate fully.

5.0 Conclusion

- 5.1 In developing the Scottish Social Housing Charter it is essential that tenants and their representatives continue to be fully involved, working with landlords, the Scottish Government and key stakeholders in the process of developing a final Charter document for consideration by the Scottish Parliament. TIS recommends that when the Charter has been revised following the comments received during this consultation period that the Scottish Government gives further opportunities for key stakeholders to comment, at the very least within the Sounding Board meetings, but also more widely with key organisations such as ourselves, TPAS, CIH, SFHA, Shelter, ALACHO, Equality and Human Rights Commission, GWSF, Scottish Disability Equality Forum and COSLA, as well as the regional networks of tenants organisations.
- 5.2 It is vitally important that the Scottish Government invests time and resources in compiling a final Charter which is meaningful, achievable and realistic within the current housing policy framework in Scotland. Landlords and tenants must develop opportunities to work effectively in partnership to set local standards and develop ways to review performance. This must include a commitment to resources, support and training for tenants and their organisations as well as for staff and members of governing bodies to fully participate in the implementation of the first Scottish Social Housing Charter and the successful achievement of meaningful outcomes.