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Dear Ms. Newton,

We are the Cheshire Regional Consultative Committee for Regenda First – Templar and Maritime in Cheshire of which I am a member. I have been asked by the Chair to respond to your Consultative Document 2. In summary, we say that maximising the economic and social benefits of involving residents in the shaping and delivering of housing services is at the core of Cheshire RCC. What Resident Involvement means needs defining at a local and national level before standards are set, and benefits are maximised. As a starting point for discussion, we suggest using TAROE's Tennant Charter.

It is difficult for many Housing Association managers and staff with many years experience of developing housing policies, and delivering housing services to suddenly respond to a political dictat requiring them to consult tenants as part of the decision making process. We already see widespread 'tick box' strategies to consultation, poor communication policies, and de-motivational tactics by managers to dissuade Resident Involvement. In developing a national Best Practice standard for RI it is important to understand the organisational Change Management resources required, and the different leadership qualities needed by senior managers, directors and CEO's to improve bottom line performance. With the leadership task ahead, the practice of part time CEO can only detract from the sharp focus required in getting RI right.

The same change process is required to encourage more Resident Involvement. A large number of residents will remain unhappy with their landlord's performance because of subjection to past policies and service delivery. They need to be 'educated' in the change process and encouraged to participate. This will require additional resources to achieve success. Without positive encouragement, this core group of disaffected residents will remain unreasonably large.

CRCC believe strongly that TSA should be involved in the complaints procedures before complaints are referred to the Housing Ombudsman. CRCC also believe that complaints statistics should be an integral part of a Housing Associations Performance Measurement for scrutiny by RI groups. We also suggest that

complaints and other performance measures are benchmarked nationally. Linking standards and performance measures to an excellent TSA process for handling infringements is important. Where a service fails, there needs to be appropriate procedures in place to improve RI as a result. CRCC do not agree that the Housing Ombudsman be the conduit through which to channel complaints to the TSA. We need the TSA to step in and enforce tenants' interests when things go wrong. We strongly support TSA mediation when landlords fail to agree / meet local standards.

To develop tenant empowerment and involvement programme we believe it is important that

residents have a structured consultation process covering all aspects of a landlords performance including complaints by category, by number, by resolution by Moving Annual Total, and clear time bound performance objectives with individual accountability. Residents also need to have the agreed information with which to benchmark their HA performance against agreed national performance standards with the right to consultation. Similarly, managers and staff must have clear performance objectives for reaching out to non participative residents offering incentives to encourage participation.

Summary of Key Questions and Answers

Q1. Do the main findings from our National Conversation research have resonance with your experience and are we drawing the correct messages for the development of the new regulatory framework?

A1: Yes. The main issue effecting meaningful Tenant Involvement is one of culture change. Organisational culture cannot be changed by a political dictat that tenants must suddenly be consulted, and have a say in how services are delivered. Individual HA's and their tenants have to engage in a change process

Q2. Does our approach to regulation seem a reasonable basis on which to proceed and one best designed to ensure we achieve improvements for tenants, whilst generating a sense of ownership from landlords?

A2: No, you are protecting yourself from tenants' complaints by using Ombudsmen as a defensive shield. TSA should be the conduit for tenants complaints

Q3: Do our key propositions for shaping the new standards framework seem reasonable basis on which to proceed?

A3: No. Consult more fully and decide what the standards are then measure performance and effect of standards with on going consultation

Q4: Does the initial list of areas for national standards and our approach to diversity and tenants with care and support needs seem appropriate.

A4: Yes

Q5: Do our initial thoughts on the areas where local standards might supplement national standards seem appropriate?

A5: Yes but where performance standards exceed national standards

Q6: How do you think the tensions should be managed with regard to whether local standards are within or outside of the regulator's intervention and enforcement powers?

A6: Can't be done. TSA has to take ownership for managing the change process and be the final arbitrator

Q7: What objectives should we have in mind in shaping the national standards that relate to the service offer to tenants?

A7: Agree national standards for Tenant Involvement then measure performance

Q8: What objectives should we have in mind in shaping the national standards that relate to tenant empowerment and involvement?

A8: TSA to suggest standards then consult with HA's and tenant groups. Review standards on an annual basis

Q9: What objectives should we have in mind in shaping the national standards that relate to the tenancy agreement?

A9: Secure tenure as per legislation

Q10: What objectives should we have in mind in shaping the national standard that relates to governance? What are your views on the options presented?

A10: Effective Tenant Involvement will require provision for training

Q11: What objectives should we have in mind in shaping the national standard that relates to viability?

A11: Consult FSA or HM Treasury and National Audit Office

Q12: What objectives should we have in mind in shaping the national standard that relates to value for money?

A12: Follow EC tendering legislation

Q13: Does our approach to monitoring information appear a reasonable basis on which to proceed?

A13: Intentionally blank

Q14: What are your views on the potential options for a grading system for assessing relative performance of landlords?

A14: A role to be considered with the National Audit Office

Q15: What are the best ways we might incentivise good landlord performance and encourage best practice?

A 15: Incentivise Tenant Involvement and Landlord performance will follow

Q16: What are your views on our high level approach to dealing with landlord failure (or risk of failure)

A16: Softly, softly approach is best, but will depend on the effectiveness of TSA's change process

Q17: What approach should we adopt to reviewing the criteria for registration under the new regulatory framework?

A17 Intentionally blank

Q18: Do you have any views on how we ought to review the system for landlord permissions under the new regulatory framework?

A18: Intentionally blank

Do please contact me should you require clarification on any points,

Sincerely,

Stan Snowdon