

TENANTS INFORMATION SERVICE

WRITTEN SUBMISSION

1.0 Introduction

- 1.1 The Tenants Information Service (TIS) is the national training, support and advice organisation working with tenants and landlord organisations. TIS is a member led organisation, with over 250 tenant and landlord members representing local authorities and Registered Social Landlords throughout Scotland.
- 1.2 TIS welcomes the opportunity to provide its views on the role and operations of the Scottish Housing Regulator (SHR). This paper reflects the views of our Executive Council made up of tenant representatives from across Scotland.
- 1.3 It is important that tenants have the opportunity to give their views directly to the Infrastructure and Investment Committee. We recommend that the Tenant Regional Networks are approached to seek their views.
- 1.4 During September and October 2014, TIS organised a series of Scottish Social Housing Charter tenant consultation events. This was carried out in partnership with TPAS and commissioned by the Scottish Government. Tenant's views about the Charter and the new regulatory arrangements are included in this report.

2.0 Effective Regulation

- 2.1 Effective regulation requires a robust regulatory system that is both flexible in approach and has sufficient tools at hand to promote and secure good outcomes in governance, improving performance and financial viability. To this end, tenants largely agree with the proportionate and risk based approach adopted by the SHR in its dealings with the sector.
- 2.2 During our recent consultation on the Charter, tenants did question whether there were sufficient resources for the Scottish Housing Regulator to carry out its remit and functions.
- 2.3 While robust regulation to ensure good governance outcomes is important, there should not be a disproportionate focus on this area. Tenant representatives recognise that the majority of Registered Social Landlords are governed appropriately and manage risks well.
- 2.4 Over the last two years, the main focus of tenant consultation work has been to raise tenant awareness of the Charter, the new regulatory arrangements and the role of tenants in self-assessment. There have been no specific consultation events to seek tenant's views on how the SHR is operating since it became an independent organisation in April 2010. We recommend that consultation events be held to seek tenants views and we would be interested to facilitate these events.

3.0 Regulatory Focus

- 3.1 The SHR in its Regulatory Framework states it regulates to “*protect the interests of tenants, homeless people and others who use the services provided by social landlords. To do this we focus on securing good outcomes for tenants and other service users, help them to hold their landlords to account and drive improvement in the provision of social housing*”. Tenants believe that intrinsic in the statement is the promise that both the SHR and social rented sector landlords will commit to principles of meaningful tenant/service user involvement, good communication, transparency and commitment to continuous improvement. Tenants perceive there is a need to hold both the regulator as well as landlords to account to improve housing service delivery.

4.0 Tenant understanding of the new regulatory arrangements

- 4.1 TIS were recently involved in organising six national Charter events with over 250 tenant representatives in attendance. The key findings from these events include:
- Tenant representatives have a good working knowledge of the Charter and were clear about its aims and its background.
 - Generally, there was a good understanding of the Charter indicators. The Annual Return on the Charter process was well understood. Tenants had a clear understanding of the tenant reporting process required of social rented landlords. The role of the new regulator was well understood by tenants.
 - Some tenants were very knowledgeable about the SHR information available on the website and reported that they found this a useful tool to access information about their landlord's performance and also to compare performance with other landlord organisations. However, the majority of tenants at these events had not previously seen the information provided by the SHR on its website. Tenants raised their concern that many tenants do not have access to a computer or broadband. Other tenants highlighted they do not have the confidence to access information online. Digital exclusion is therefore a key issue for many tenants who feel excluded from the information provided by the SHR, as it is only provided online. Tenants identified the need for this performance information to be provided in paper copies, either by the SHR or by their landlord.
 - Tenant representatives were aware that all social landlords are required to provide a report to tenants and service users on progress with the Charter by the end of October 2014.
- 4.2 It is essential that the SHR continues to attend tenant seminars, events and meetings to explain the work that it does and the impact that it is making.

- 4.3 It is important that the SHR shares good practice of the effective partnership work that is happening with tenants and landlords throughout Scotland.

5.0 Tenant Scrutiny

- 5.1 During our Charter consultation while tenants had a good working knowledge of the Charter, there were only a few examples of tenants being actively involved in monitoring performance information and working with their landlords to prepare the Annual Return on the Charter report to the Regulator.
- 5.2 Many tenants identified that they had not been actively involved in working with their landlord to measure performance and in the preparation of the first ARC submitted in May 2014. Some tenants had been kept up-to-date at meetings about the landlord's ARC report but had not been involved in validating the performance information.
- 5.3 The majority of tenants have been working with their landlords to agree the format, content and style of the report to tenants. There were many examples of editing groups, panels and focus groups being established to work on tenant reports. Tenants identified that it is useful for landlords and tenants to work together on tenant publications to ensure that documents are easy to read and provide value for money.
- 5.4 There were many examples of partnership working and support for tenants to understand the Charter.
- 5.5 There were many examples of tenants being involved in tenant scrutiny through the development of scrutiny groups and panels. Many of these groups are fairly new and are aiming to be more actively involved in measuring landlord performance and ARC reporting over 2014-2015.
- 5.6 There is a great deal of tenant involvement in the Charter through scrutiny activities. The majority of tenants identified that the Charter process has encouraged more tenants to get involved. It has also given a renewed focus for landlords and tenants to develop tenant participation opportunities. The Charter is seen by tenants as a positive way to develop partnership working to improve housing services.

6.0 National Panel of Tenants and Service Users

- 6.1 Recruitment to the National Panel has proved to be successful with a membership of over 300 members. The Panel provides a valuable role in terms of identifying tenants' views and priorities. To our knowledge, we are not aware of any opportunities provided to panel members to come together and discuss issues collectively prior to feeding their opinions back to the SHR.

7.0 Regional Networks of Registered Tenants Organisations

- 7.1 The SHR has established a liaison group with representatives from the Regional Networks. Regular meetings are held throughout the year which provides an opportunity for the SHR to update on its work and to hear tenant's views and priorities. Most of the SHR communications are through its website and by emails which excludes many tenants who do not have access to a computer and broadband.
- 7.2 The SHR has made a commitment to engage RTOs over a three-year period. Similar to the National Panel the preferred method is through a pre-set questionnaire. It is important that the findings of SHR consultations are circulated and shared.

8.0 Tenant Assessors

- 8.1 TIS recognise the value and important role that Tenant Assessors have played in the regulation of social rented housing in Scotland. We believe that the role of Tenant Assessors is currently being reviewed in light of the new regulatory arrangements. We support a continuation of the role of Tenant Assessors to promote the interests of tenants and service users in the regulation of the social rented housing sector.

Tenants Information Service
5 December 2014

