



30th March 2015

Tenant Participation Strategy Consultation  
Social Housing Reform Programme  
Ground Floor Lighthouse Building  
Gasworks Business Park  
Belfast BT2 7JB

Dear Sir/Madam,

**Re: Social Housing Reform Programme, Draft Tenant Participation Strategy 2015-2020**

I refer to the above and am pleased to offer comments and observations as a contribution to the current consultation on the Draft Tenant Participation Strategy 2015-2020 presented as part of the Department's Social Housing Reform Programme.

Supporting Communities NI (SCNI) is an independent charitable organisation which champions tenant and community participation by developing groups, supporting active citizenship and building cohesive communities. At the same time, and in partnership with the NI Housing Executive, SCNI supports and facilitates the Housing Community Network, (the most important framework for tenant participation established in Northern Ireland to date) which was established in 1995 by the Housing Executive in response to the need for housing and related policies to be developed with and on behalf its tenants and customers.

SCNI not only works with the Housing Executive but also a range of Housing Associations and other organisations in housing and related matters, for example, NI Federation of Housing Associations (NIFHA) and Chartered Institute of Housing NI (CIHNI), and has played the leading role in promoting, developing and supporting tenant participation in Northern Ireland over the last 35 years.

SCNI has a proven track record of promoting and supporting tenant and community involvement in housing and have developed and piloted activities such as; tenant led inspection, mystery shopping of housing services and tenant scrutiny and is pleased to continue to support engagement between local communities and landlords through, for example, the Housing Community Network on the part of the Housing Executive and more ad hoc engagement on behalf of various Housing Associations.

The views and observations contained in this response are informed by this experience. The views are further supported by a number of research and information exercises undertaken in recent years with members of the Housing Community Network discussing the role and future of tenant and resident participation in the delivery of housing services in N Ireland. SCNI has also partnered Departmental officials during the past year in engaging with tenant representatives through the Housing Community Network in particular, discussing the key elements of the Social Housing Reform Programme with particular emphasis on the Draft Tenant Participation Strategy.

We have welcomed the approach taken by the Department and its officials in the promotion of tenant participation and welcome the Draft Strategy as a major advance which offers a great many benefits to social housing tenants across N Ireland regardless of who their landlord is.

By way of an introduction to our comments on the draft Strategy, we take this opportunity to reflect upon the Minister's comments in the Foreword; SCNI has long advocated the establishment of an appropriate context for tenant participation in N. Ireland and concur with the Minister that the principal missing element was an overarching strategy which sets out to what extent and with what support tenants can expect to be involved in the management of their landlord and in the delivery of housing services. We also agree with the Minister's expressed view that involving tenants in shaping services ensures the delivery of better and more responsive services.

SCNI is particularly encouraged and heartened by the recognition given by the Minister to the good work that is already ongoing and the expressed intention to learn from this work and to build upon it; we see that as a positive vindication of the work SCNI have been involved in principally, but not exclusively, with the Housing Executive and it's representative tenants groups and with the Housing Community Network.

We are further encouraged when the Minister asserts, "Tenants must be encouraged and supported to become involved at the level with which they feel comfortable. They should also be given the opportunity to develop their skills further to enable them to progress to a higher level of participation." as we see this as an accurate reflection of the ethos which has underpinned the work of SCNI from the outset and continues to do so. We fully endorse the intention on the part of the Department to develop a Tenant Participation Strategy for all social landlords and encourage the Department to proceed with formally placing such a strategy on a legislative footing.

I hope you find these and the attached comments useful to the on going consultation exercise.

Yours faithfully,  
For SUPPORTING COMMUNITIES NI  
Murray Watt, Policy and Information Officer

## **Draft Tenant Participation Strategy 2015-2020**

### **Comments from SCNI March 2015**

Background SCNI are wholly supportive of the stated intention of the Department to develop a plan to increase tenant involvement in the delivery of the housing services of all social landlords across Northern Ireland.

We welcome the recognition given in the draft strategy to the need to establish “proper and appropriate policy, models of engagement and levels of resources in the delivery of the strategic objectives”. We also welcome the opportunity to discuss models which go beyond ‘involvement’ to tenant management and tenant ‘ownership’ which can give tenants/communities the option to take responsibility for the delivery of their own social housing services. SCNI has always been keen to examine and test the potential for such models, where it is feasible and appropriate, and where there is an appetite amongst tenants to progress to such levels of ‘empowerment’. The draft strategy, as presented, represents a very welcome first step in this direction.

### **Tenant Participation**

Where it is true to say, “*a relatively small investment in participation activities can bring significant benefits for tenants, the wider community and landlords. Tenants who get involved can improve their skills. Neighbours can build stronger links helping communities to stick together. Neighbourhoods can become more settled places. Happier tenants and communities mean properties are not likely to lie empty for long and rents are more likely to be up-to-date.*”, it becomes incumbent on all of us to ensure that such an investment is encouraged and supported across **all** social landlords. This can be best achieved by ensuring that we provide every encouragement, support and adequate resources to landlords and tenants to achieve optimal engagement. A recent study and publication by the National Tenants Organisation (Tenants Leading Change: An Investment not a cost; The business benefits of tenant involvement, March 2015) found that from the information gathered from a range of housing associations across England that it was correct to suggest that tenant involvement can and does lead to significant business benefits, as well as a range of other social and community benefits. From the discussion in this part of the draft strategy, it is clear that the Department recognises and understands the benefits of tenant participation in the design and delivery of housing services and this is welcomed.

We also welcome the apparent adoption by the Department of a “ladder of involvement” which indicates where and to what extent tenants can participate in the service planning, delivery and long term strategic direction and management of their landlord. This is a model which has long been used and promoted by SCNI as it allows for progression along the tenant participation continuum. We, therefore, believe that its adoption by the Department makes

a significant contribution to establishing a context within which certain types of participation activity can be properly located. SCNI welcomes the Department's acknowledgement for progressing tenant participation to potential tenant management and ownership models.

The Department has, quite correctly, highlighted the legislative and strategic bases for tenant participation which have been adopted in England, Scotland and Wales and provides the context for making a strong case for placing tenant participation on a formal legal basis in Northern Ireland.

In so doing, SCNI believes that the Department should place a **requirement** on all social landlords to develop formal tenant participation strategies and to offer advice and guidance to landlords on standards for participation and involvement against which they will be measured. We also see merit in the development of a 'Social Housing Charter' based on the Scottish model but also as an extension of the previous Housing Executive 'Tenants Charter' which gained considerable traction in the 1990s and formed the basis for the establishment of the Housing Community Network.

SCNI and the work we are engaged in is well recognised in the draft strategy; we welcome this recognition and believe that we can play **an essential role** in promoting and supporting tenant participation across all social landlords in N Ireland. The experience and expertise we have gained and developed over several decades provides the Department and social landlords with a valuable resource in advancing enhanced tenant participation going forward for the proposed lifetime of this strategic document and beyond.

The case for a Tenant Participation Strategy is well made; additionally, SCNI recognises the need and the desire to provide a consistent approach to participation and engagement across **all** social landlords; to provide more opportunities for tenants to become more involved in the delivery of housing services and the management of their landlords and to promote and encourage empowerment models where they are deemed necessary and where there is a commitment to them.

It is clear then that there are three key tasks which we would encourage the Department to progress going forward. These are highlighted in the draft strategy as:

- Defining the role and contribution to be made by social landlords;
- Developing and supporting tenants' capacity for greater participation; and
- Providing leadership and support more generally.

SCNI re-emphasises its experience and expertise to the Department in independently shaping and helping to fulfil these key tasks for the lifetime of the proposed strategy and beyond.

## **Developing Tenant Participation and Empowerment in Northern Ireland**

**Principles For Tenant Participation** - SCNI would find little to disagree with in the principles as presented in the draft strategy. Nevertheless, as with all such documents, we would suggest that we should collectively view and review any such principles to maintain their support and relevance. One point that ought to be made, however, is that where social landlords are encouraged or urged to develop strategies for tenant participation, one should sharpen the focus by ensuring these are strategies for **effective** tenant participation.

Experience in Northern Ireland tells us that legislative requirements are the most effective driver of change, either in direction or impetus, and we need only to look at the impact of the Fair Employment Order or indeed the requirement for public bodies to place equality to the front and centre of their policy making through the adoption of Equality Schemes. With that in mind, SCNI would recommend that the Department requires **all** social landlords to draft and adopt tenant participation strategies. We further believe that such strategies should demonstrably influence the business planning of the association and that this is reported annually to the Department or other regulatory authority to be established.

There are clear benefits to the social landlord in meeting this requirement; it directs associations focus to commit to tenant participation, it encourages associations to take a strategic view to developing and enhancing participation, it identifies and provides the resource commitment required to meet participation needs and it ensures that tenant participation and reporting on its performance remain 'front and centre' of the association's planning and governance. We believe this is the most appropriate way forward.

**Regulatory Standard for Tenant Participation** - SCNI believes that it is fair and proper to place the proposed Regulatory Standard on all social landlords. The Standard proposed is very clear and unambiguous and SCNI endorses the objective that 'social landlords manage their businesses so that tenants and other customers find it easy to participate in and influence their landlord's decisions at a level they feel comfortable with.' We also refer to the guidance on specific standards and outcomes as outlined in Appendix 2 of the draft strategy and concur that these are both a reasonable and realistic description of what social landlords should be achieving by meeting their duties on tenant participation.

In terms of process around the regulation of tenant participation, SCNI feels that a common performance reporting mechanism should be established as part of the on going Reform Programme. We would consider the adoption of a regulatory structure based on the Scottish model (Scottish Housing Regulator) as a helpful addition to social housing in Northern Ireland whereby an independent Regulatory body involving tenants can monitor, review and inspect (if necessary) against the tenant participation standard. Indeed we, in SCNI, feel that we have the necessary skills and expertise and are very well placed to play an independent supportive role to whichever agency is given responsibility to carry out this regulatory role i.e. in terms of complying with the tenant participation strategy.

### **An Independent Body to support Tenant Participation**

The Department suggests that an organisation like TPAS should be available to all tenants in Northern Ireland to ensure independent tenant support; we would contend that SCNI fulfils that role, having originally been established as a result of amalgamation of NI Tenants Action Project (NITAP), from TPAS and the Estate Action Project in 1991. SCNI promotes tenant participation and empowerment and provides independent advice and training support similar to our sister organisations in England, Scotland and Wales. Indeed SCNI retain and maintain a close relationship with our partner TPAS organisations regularly exchanging experience, expertise and good practice.

As the document correctly identifies, SCNI has a long and successful track record in tenant participation (35+ years) partnering the Housing Executive in developing and supporting the Housing Community Network. SCNI have also piloted and developed a range of other initiatives and activities which enhance the level of tenant involvement in the design and delivery of housing services. These include mystery shopping of housing services (which we also conduct in partnership with and on behalf of housing associations), tenant led inspections, customer journey mapping, housing forums, estate inspections and multi-agency partnerships. We are currently working with colleagues in the Housing Executive in developing independent support for tenant scrutiny panels and a number of these have been successfully meeting with housing staff providing real input to services such as response maintenance and rent collection and arrears recovery.

SCNI values its role over the past 35 years as providing **independent** tenant/resident support – be that in terms of providing independent support to the Housing Executive through our work with the Housing Community Network or indeed through our past and current support to individual housing associations across the voluntary housing movement. SCNI has worked with quite a number of housing associations over many years to support tenant engagement and provide feedback on housing services. We have reflected this commitment through the provision of dedicated staff resources to assist housing associations to develop, train and support services to their tenants. SCNI has also provided independent support to several housing associations in the past year, including Apex HA, OakleeTrinity and Helm HA in the review of existing or development of new tenant participation strategies.

SCNI, therefore, believes that we are best placed, indeed the only organisation that is well placed, to support the Department, housing associations and their tenants to develop and deliver effective tenant participation through this proposed Strategy. We believe that tenant participation should be consistent across all social landlords and the only way to deliver this consistency is through the funding of one organisation, as has been proposed in the draft strategy. The experience and expertise that SCNI has developed over many years working principally, but not exclusively, developing tenant participation in Housing Executive estates, is not only readily transferable to but also an invaluable resource available to housing associations across N Ireland.

**Tenant Participation Advocate & Housing Policy Panel** – The draft strategy refers to the establishment of both an Advocate for Tenants and a Housing Policy Panel for Northern Ireland. The suggested role of the Advocate for tenant participation is to monitor the delivery of the strategy however we feel that more clarity is required as to where this role will sit i.e. within the Department or outside it. In relation to the creation of a Housing Policy Panel which will ‘represent social housing tenants in the development of departmental policies that are relevant to their interests’ – SCNI can see the benefits of such a Panel and indeed would welcome the opportunity to be represented on the Panel, if established, where we can share our experience, knowledge and expertise. Indeed, SCNI fulfils a similar role to the Department at present through our involvement on the Housing Sub-committee monitoring the implementation of TBUC Strategy.

In addition, we feel that it would be imperative that landlords (Housing Executive and Housing Associations) and their tenants are also represented on this Panel, made up from both from representatives of the Housing Executive’s Housing Community Network as well as tenant representatives from the voluntary housing movement. Again, more detail on where this Panel would sit would be very welcome.